

Anti-Slavery Policy

About Securecorp

Securecorp are a leading national provider of security, cleaning and integrated services. First established in 1998 as a Victorian-based security and risk management business, Securecorp has since grown to a nationwide group of companies delivering a full range of services, including:

- a) security services;
- b) cleaning and integrated services;
- c) electronic security and installation and maintenance services;
- d) security and alarm monitoring;
- e) training and professional development.

Securecorp recognises its growth since its establishment in 1998 and the increasing globalization and diversification of its supply chains, and as such is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.

This Anti-Slavery Policy / Modern Slavery Statement (**Policy**) applies to all persons working for or on behalf of Securecorp, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative. To the extent that the contents of the Policy refers to obligations on the Company, they are guidelines for management or summaries of applicable legislative requirements only and are not contractual terms, conditions or representations on which a staff member may rely.

Securecorp expects all who have, or seek to have, a business relationship with our company, to familiarise themselves with this Policy and to act in a way that is consistent with its values.

Securecorp will only do business with organisations who fully comply with this Policy, or those who are taking verifiable steps towards compliance.

This Policy will be used to meet any statement on slavery and human trafficking obligations that the Company is required to produce in accordance with the *Modern Slavery Act 2018* (Cth) (**MS Act**).

Australia's Modern Slavery Act 2018

Australia's MS Act 2018 (Cth) defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services; and the worst forms of child labour.

All forms of modern slavery have in common, the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires colleagues to play a part and remain vigilant to the risk in all aspects of the Securecorp's business and business relationships.

Securecorp is committed to being compliant with the requirements of the MS Act, including reporting requirements.

Securecorp's structure, operations, and supply chains

Structure and Operations

As outlined above, Securecorp is a nationwide group of companies delivering a full range of services.

Securecorp has offices in most Australian capital cities, employs over 2,800 staff and have now expanded its services into New Zealand.

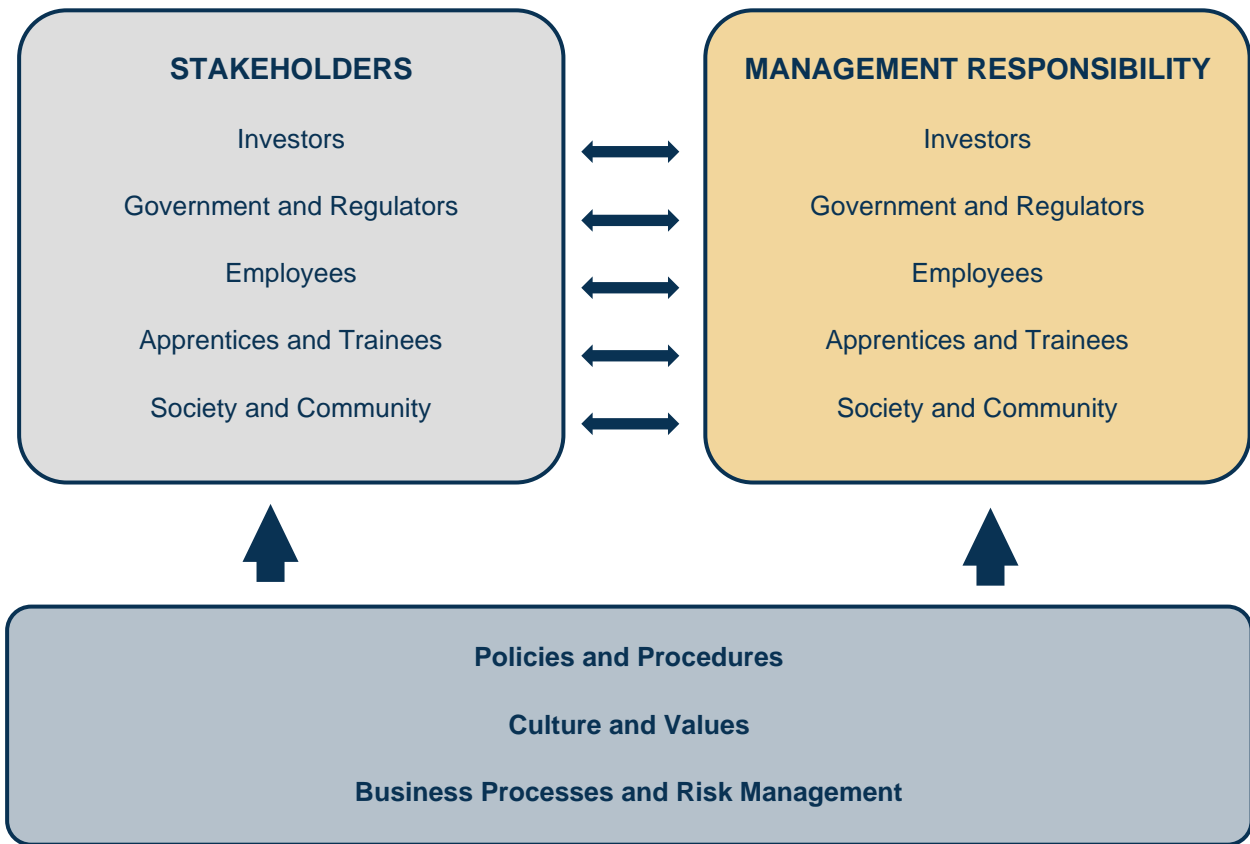
This Policy will apply across the entire Securecorp group of companies (**Group**), and it provides a consolidated description of all the actions taken by the Group to address modern slavery risks, particularly as the entities within the Group largely operate under the same policies and processes and have many shared suppliers. Where relevant, a reference to Securecorp includes reference to the Group.

Securecorp will take a collaborative approach to combatting modern slavery, including ensuring that all relevant areas of its entity and any entities it owns and controls, are aware of what actions they need to take and that modern slavery risks relating to these areas and entities have been identified, assessed, and addressed.

Securecorp will consult with the entities it owns and controls to a degree which reflects its relationship with the other entities and the risk profiles of those entities. Its consultation will be sufficient to ensure that the modern slavery risks relating to the other entity have been appropriately identified and that other entity is aware of what actions it needs to take.

In summary, Securecorp's Organisation and Governance Structure can be represented by the diagram in Figure 1.

Figure 1 – Securecorp’s Organisation and Governance Structure



Securecorp is led by a leadership team with the Securecorp Managing Director overseeing day to day operations of the company. Delegation of authority principles exist to enable leadership across all parts of the business.

Management responsibility interacts and is accountable to stakeholders on a day to day basis. These stakeholders include Securecorp’s investors, the Government, regulators, employees, apprentices, trainees and more generally the wider community.

Overarching Securecorp’s organisation and governance structure is its policies and procedures, culture and values and business processes and risk management.

Supplier Chain

Securecorp appreciates it supply chain constitutes the services (including labour) that contribute to the Company’s own services, including services sourced in Australia or overseas.

Securecorp has a global supply chain made up of contracted suppliers. Our supply chain relationships include suppliers from the following sectors: Cleaning and Integrated Services, Consulting Services, Corporate Clothing, Electronic Security and Installation, Fleet Management, Information Communications and Technology, Logistics and Transport, Marketing, Office Cleaning, Office Suppliers, Property Services, Recruitment, Security and Alarm Monitoring, Security Services, Training and Professional Development, and Travel.

As a proud Australian business, Securecorp is committed to engaging Australian suppliers wherever possible for its Australian operations. Over approximately ninety per cent of Securecorp's total procurement spend is within Australia, including a considerable portion within the State of Victoria.

Securecorp recognises the services that contribute to its own services extend beyond those received from direct suppliers. Securecorp's supply chain also includes services used by indirect suppliers.

Policies and Procedures

Securecorp understands the importance of protecting human rights and is committed to protecting the rights of all people. Modern slavery goes against everything Securecorp stands for. Securecorp has key policies and procedures in place to assist in protecting human rights, including this Policy.

Risk of Modern Slavery practices in operations and supply chains of Securecorp

Risks of modern slavery practices means the potential for causing, contributing or being directly linked to modern slavery through operations and supply chains. Modern slavery has the potential to exist in Securecorp's supply chains in a number of ways, including by child labour, debt bondage, forced labour and human trafficking.

Securecorp appreciates the following risks in its operations and supply chains:

1. Risks that Securecorp may cause modern slavery practices;
2. Risks that Securecorp may contribute to modern slavery practices; and
3. Risks that Securecorp may be directly linked to modern slavery practices.

Securecorp considers the third risk the most likely (if any), that Securecorp may be directly linked to modern slavery practices. Securecorp is highly aware of the risk that its operations and services may be connected to modern slavery through the activities of another entity Securecorp has a business relationship with, including those suppliers which maintain a majority of operations outside Australia. These business relationships include all entities in the Securecorp supply chain, including entities Securecorp does not have a contractual relationship with. It also includes all business partners and investees and borrowers but does not include customers who purchase Securecorp services.

Securecorp considers services arising from Commercial Cleaning, Electronic Installations and Print and Promotional Goods sectors, to be of the highest risk of modern slavery in Securecorp's supply chain. Securecorp appreciates its most severe modern slavery risks may not align with the volume or cost of the products and services procured.

Further, Securecorp realises services procured from North Korea, India, China, Cambodia, Afghanistan, South Sudan, Pakistan, Nigeria, Ethiopia, Russia, Thailand, Central African Republic, Democratic Republic of Congo, Myanmar and Bangladesh may constitute some of the highest modern slavery risks. This is due to a variety of factors including some countries maintaining poor governance, weak rule of law, conflict, migration flows, and socio-economic factors like poverty.

Securecorp is committed to continually improving how they work with business, government, suppliers and society to meet moral and ethical obligations to combat modern slavery and human trafficking.

Securecorp is strongly committed to working with its suppliers to eliminate modern slavery from its supply chain.

Due Diligence and Risk Management - How Securecorp seeks to put our Anti-Slavery Policy into practice

As a leading security services organisation, Securecorp considers the risk of modern slavery within its direct business operations to be low, particularly given the majority of Securecorp services are delivered from Australia under the supervision of Securecorp employees. However, as foreshadowed above, Securecorp recognises its supply chain and customers can be indirectly exposed to modern slavery and human trafficking risks.

Securecorp works with its stakeholders to identify and understand the impacts of its activities. Due diligence is implemented to prevent and mitigate adverse impacts arising from Securecorp's activities. This due diligence refers to an ongoing management process to identify, prevent, mitigate and account for how Securecorp addresses actual and potential adverse human rights impacts in its operations and supply chains.

The due diligence process is initiated by a risk identification and assessment of suppliers prior to any contracting. Securecorp has implemented risk management processes in order to identify, monitor, assess and mitigate potential risk areas where Securecorp could be exposed to human rights concerns.

Securecorp then integrates findings from the risk assessment across the organisation and, where applicable, the Group, taking actions, as appropriate, to address impact. These include measures through good governance, contractual arrangements, access to remedies through effective grievance mechanisms, training and communications, and the use of statutory declarations. These measures are discussed in more detail below. Securecorp being a medium/large Australian enterprise understands its ability to use its leverage to minimise modern slavery risks may be limited (although less limited than small enterprises), particularly when engaging with large conglomerate organisations further down its supply chain.

Securecorp has begun tracking its performance to consider whether impacts are being addressed. Securecorp intends to conduct internal audits of its supplier screening.

The final part of Securecorp's due diligence process is publicly commenting on Securecorp's actions, which includes through the publication of this statement.

Governance

Good governance is essential to the long-term sustainable success in eliminating modern slavery. Good governance is ingrained at Securecorp and is the collective responsibility of all levels of management and even more widely extends to all employees. The risk of modern slavery in Securecorp's operations and supply chain is assessed within Securecorp's corporate-wide governance and risk management framework. Responsibility for assessing and addressing modern slavery risks have been assigned to a senior manager, and Securecorp's leadership team is briefed regularly and appropriately.

Contractual Arrangements

Through contractual arrangements and procurement principles, Securecorp's suppliers and contractors are required to comply with Securecorp policies wherever possible. Securecorp's standard terms and

conditions also require minimum standards in ethical business practices, safety and environmental protection.

Grievance and Feedback

Securecorp has a number of mechanisms for stakeholders and other third parties to anonymously report suspected or actual illegal activities, breaches of human rights, and/or company policies.

In addition, Securecorp clients, suppliers, and third parties can raise modern slavery related concerns via our webpage <https://www.Securecorp.com.au/en/>.

Grievances can also be received via direct correspondence, social media or through bodies such as the Human Rights Commission and the Department of Home Affairs.

Where concerns are raised, Securecorp will conduct an investigation in accordance with regulatory requirements and applicable policies and procedures. Securecorp's grievance procedures ensure all grievances are managed and investigated in a comprehensive, timely and transparent manner.

Statutory Declarations

Before engagement, Securecorp will be asking any suppliers, where possible, to sign a statutory declaration (or equivalent) representing an additional commitment to work with Securecorp to reduce slavery from its organisation and supply chain. If this is not possible, Securecorp will be clearly communicating its expectations to suppliers, including by ensuring that modern slavery issues are specifically addressed in supplier contracts, prequalification and other relevant mechanisms.

Securecorp wants to ensure they are well prepared to respond if they find modern slavery occurring in its operations and/or supply chains.

Actions taken to date

Actions taken to date in order to minimise the risks of modern slavery within Securecorp include:

- preparing to commence investigations into suppliers providing products/services purchased by the company such as corporate clothing, to determine any risks of modern slavery; and
- undertaking a gap analysis of Securecorp's current policies and procedures against the Australian Modern Slavery Act.

Assessing these actions

Securecorp continues to assess the effectiveness of its actions in comparison to industry standards and practices.

There are a range of ways Securecorp demonstrates how they assess the effectiveness of its actions, including:

1. An established process to regularly review the actions they have taken. This includes an annual leadership team review of Securecorp's response to modern slavery.
2. Regularly checking risk assessment processes to ensure they remain up to date.
3. Established processes to provide for regular engagement and feedback.
4. Conducting internal audits and/or monitoring of specific steps Securecorp has taken to assess and address modern slavery risks.

5. Tracking the actions taken and measuring the impact.
6. Working with suppliers to check how they are progressing, including any actions they have put in place to address modern slavery risks.

Securecorp is also considering developing a modern slavery key performance indicator to assess the quantitative impact of actions over time.

Communication and Training

We have communicated our intentions and consultative approach regarding process of risk identification and assessment of suppliers, to all entities within the Securecorp group of companies (Group). This communication and consultation was initially delivered and will continue to be maintained, through correspondence and Executive Meetings.

Further to this, across 2020-2021, Securecorp employees intend to complete risk awareness training which will include information on modern slavery.

Modern slavery requirements and updates will be communicated to all Securecorp employees during team meetings and onsite training sessions to ensure compliance with this Policy across Securecorp's entire business.

Executives will ensure that relevant colleagues receive adequate training on this Policy and any supporting processes applicable to their role.

Looking forward

Further to our commitments in this policy, Securecorp aims to implement the following measures over the course of the Calendar year in 2021:

- a) Securecorp will collect data (from questionnaires and consultation) and conduct risk assessments to determine which parts of our Tier 1 supply chains (i.e. manufacturers who provide products directly to Securecorp) are most at risk from modern slavery.
- b) Where possible, Securecorp will further engage directly with our suppliers with respect to this Policy to understand the measures, they have in place to mitigate modern slavery within their own operations.
- c) When we assess new contracts, we will request wording to specify prohibition on trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services; and the worst forms of child labour.
- d) Our organisation's expectations are for our contracted suppliers, to hold their own suppliers to the same standards and we reserve the right to terminate any contractual arrangement if there is a breach of this policy.

Responsibility for this Policy

Our Executive Team has overall responsibility for this Policy and in ensuring that Securecorp complies with all its legal and ethical obligations. All Executives are responsible for ensuring that their teams comply with the provisions of this policy in the day-to-day performance of their roles.

Witnessing /Reporting breaches of this policy

Should you become aware of or witness any suspected breached of this policy or any illegal or unethical behaviour you are required to be proactive and promptly report these matters to your line manager, next level manager or the Company's Compliance team. Complaints will be kept confidential and will be dealt with appropriately. You will not experience retribution or retaliation for a complaint made in "good faith". If a member of staff believes that a breach of this Policy has occurred or is likely to occur, they must report this as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, you should raise this with your manager /next level manager or the Company's Compliance Team.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

Securecorp also maintains a Whistleblower Protection Policy that promotes and supports a culture of compliance, honesty and ethical behaviour. Please refer to this policy for further details and reporting processes.

Policy Breaches

A breach of this policy by any Securecorp team member may lead to disciplinary action being taken in accordance with the Company's Code of Ethics. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal. All workers will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this Policy or any related processes or procedures. It is important to remember that modern slavery is a criminal offence in Australia and offenders can be prosecuted.

Status of This Policy

This Anti-Slavery Policy will be reviewed by Executive Management on a regular basis.

This notice reflects the Company's current practice. Securecorp will update the notice from time to time to reflect legal and operational requirements.

Approved by: Managing Director