

Modern Slavery Statement



Introduction

Securitas Australia (PSGA Pty Ltd) is pleased to provide to the Australian Border Force its Modern Slavery Statement (**MSS**) for the 2022 calendar year for filing on the *Online Register for Modern Slavery Statements*.

This MSS relates to the reporting period from 1 January 2022 to 31 December 2022. The MSS addresses the mandatory criteria required by section 16 of the Modern Slavery Act 2018 (Cth) (**MS Act**).

The MSS sets out the company's approach to:

- Implementing its Modern Slavery Policy (**MS Policy**) within Securitas Australia and its group of companies and within its supply chain; and
- Identifying and acting on any modern slavery risks.

Securitas Australia is committed to the identification and eradication of modern slavery practices and related abuses within and throughout its business and supply chains. Securitas Australia acknowledges the risk of modern slavery practices occurring within both its own business and its supply chain.

2022 Analysis

Securitas' main impact on society is contributing to making everyone safer. The issues that we have defined as material are vital to our ability to contribute to safer societies, and we consider social conditions to be included such analysis. Our process for identifying materiality provides a future focus for our sustainability work and helps us analyse our impact across the value chain. It provides us with deeper insights into stakeholders' expectations on Securitas, how we should develop our sustainability agenda and how our stakeholders perceive the outcome of our progress and strategy.

Our system for managing our work related to environmental, social and governance areas comprises six key components:

1. **Securitas' Values and Ethics Code:** One of the company's most important policies, Securitas' Values and Ethics Code stipulates the basic principles that Securitas expects its employees and business partners to follow at all times.
2. **Employee training:** All Securitas employees undergo training in Securitas' Values and Ethics Code. An in-depth training program, either as an e-learning course or a classroom training. Relevant employees also receive training in other core policies, such as the anti-corruption policy.
3. **System for reporting non-compliance:** The Securitas Integrity Line is a Group system used for reporting cases of non-compliance with Securitas' Values and Ethics Code. All employees and business partners are encouraged and expected to report any cases of non-compliance, with the assurance that the reporter will not be subjected to any negative consequences.
4. **Risk management:** Non-compliance with Securitas' Values and Ethics Code is considered a risk, and as such, it has been classified as one of seven priority risks in the Group's enterprise risk management process. These risks are followed up on a regular basis.
5. **Monitoring:** To meet the demands of clients and other stakeholders with respect to increased transparency and communication, Securitas AB publishes a sustainability report that follows the Global Reporting Initiative (GRI) standards.
6. **Group Sustainability Officer:** The Group Sustainability Officer leads the Group's ongoing sustainability work and, in addition to following the regular reporting line, also reports to the Board of Directors' Audit Committee. Responsibilities include coordination of sustainability activities across the Group, which involves working closely together with other core functions. Other responsibilities include stakeholder engagement on sustainability issues, and supporting the Group's countries of operation with respect to sustainability matters.

Insofar as Securitas has made improvements in its commitment to reduce any modern slavery risk, the following major changes have occurred in the reporting period:

- Targeted training to country leadership, senior leadership and key staff in the procurement chain on business ethics, corruption and slavery risks.



- Embedding and enhancing local trade sanctions process – a process that requires Securitas to undertake trade sanctions check on new suppliers, and large suppliers every year based on purchasing history.
- Creation of Supplier Risk Management (SRM) process to place suppliers through a rigorous onboarding process to ensure compliance with Securitas' values, Values and Ethics Code, Business Partner Code of Conduct and other internal advisory documents that enhances Securitas' ethical business relations. The SRM is to be implemented in 2024.

Supply chain

We must ensure that our suppliers live up to our requirements and that they comply with Securitas' Business Partner Code of Conduct and our anti-corruption policy. The new SRM process places additional internal controls to strengthen corporate decision making responsibility and commitment to eliminating modern slavery in the supply chain. Suppliers of certain goods or services are defined as critical suppliers. Generally, critical suppliers are those whose failure to perform could materially impact Securitas' performance or brand, locally or globally. Examples are suppliers that deliver goods, equipment, materials or services that materially influence the quality of Securitas' service delivery, such as suppliers of uniforms and electronic security equipment, sub-contractors who deliver security services to Securitas' clients and suppliers using the Securitas brand.

Selection of suppliers, new and ongoing will be made using the assessment tools as stipulated above to evaluate whether the supplier has established a selection procedure, and conducted risk assessments of its own suppliers.

Memberships and engagements in organizations

Securitas is a member of a number of industry organizations: including International Security Lige, Australian Security Industry Association Ltd (Australia) International commitments, UN Global Compact, International Security Lige's Code of Conduct and Ethics Sustainability indexes, FTSE4Good Index Series, STOXX Global ESG Leaders Sustainability ratings (main), Net Impact (Upright), MSCI, Sustainalytics Supplier rating systems and reporting, EcoVadis, Sedex, CDP.

Human Rights

Securitas as part of a global company, works in many different markets around the world and in all of them we prioritize fair wages and working conditions. Securitas' Values and Ethics Code together with other key policies ensure that the company maintains and promotes the highest ethical business standards, and we also use our influence as one of the largest global players in the industry in discussions with clients, unions and industry associations.

Securitas has launched, and training has been provided throughout Australia to employees to be aware of the integrity line. The integrity line provides a confidential process for employees and stakeholders (internal and external) to confidentially report concerns, including those relating to supply chain and modern slavery. All concerns are managed externally to the country and in confidence. Such reporting channels may be used for reporting of non-compliance with human rights and modern slavery risk.

Mandatory Reporting Criteria under the MS Act

The responses to the mandatory criteria set out in section 16(1)(a) to (g) of the MS Act are as follows:

a The reporting entity

- The reporting entity is PSGA PTY LTD trading as Securitas Australia (ABN 92 67 106 191 039).
- Its head office is in Preston, Melbourne, with offices nationally across Australia.
- Securitas Australia was incorporated in 2003, and has established a reputation for reliability and customer service.
- Securitas Australia provides security services and related services, such as onsite and mobile guarding, monitoring, cash in transit services and private investigations.

b The reporting entity's structure, operations and supply chains

- Securitas Australia is wholly owned by Securitas Asia Holdings AB., a Swedish incorporated company. This entity operates in over 35 countries. This company is itself wholly owned by the ultimate parent company Securitas Sverige AB, a Swedish incorporated company, with its headquarters in Stockholm.
- The three core guiding values of the global Securitas group of companies are integrity, vigilance and helpfulness.



- Securitas Australia has a number of wholly owned Australian subsidiary companies. This MSS applies to and takes into account all subsidiary companies (**Securitas Group**). The Securitas Group provides security and related services to a range of industries, including specialist security services for aviation.
- The majority of Securitas Australia's employees work as full time security guards. Securitas Australia does not engage any guards as independent contractors.
- Securitas Group's supply chain provides for the procurement and purchase of:
 - Various technology equipment from Australia and overseas
 - Company uniforms from Australia and overseas
 - Vehicles from Australia and overseas

c The risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities Securitas Australia owns or controls

Securitas Group's Operations

- Securitas Group has a low risk profile within its own operations, where employees are recruited and inducted through a fair and transparent recruitment process, with checks for Australian visa status with work rights, and ensuring compliance with employment and safety legislation from the time they commence employment.
- Prior to the passage of the MS Act, Securitas Australia had already established a range of corporate policies to promote and uphold the highest standards of employee welfare and corporate governance.

Securitas Group's Supply Chain

- Our Global Securitas Values and Ethics Code and Business Partner Code of Conduct was established in 2004. It provides the foundation for the conduct of business in relation to modern slavery and related ethical and legal risks. Securitas requires its suppliers to comply with Securitas' Business Partner Code of Conduct, which includes non-acceptance of child labour and forced labour.
- This policy applies to all suppliers, sub-contractors and business partners, setting out requirements for the conduct of their own businesses, including the treatment of their respective workers and suppliers. The policy has a mechanism to report any non-compliance to Securitas Australia.
- Securitas Australia has previously engaged the services of third party labour hire agencies across Australia, to provide specialist skills to manage variations in its own labour requirements particularly in the construction industry.
- The controls Securitas Australia has in place allows it to identify and prioritise its focus on risk suppliers. Purchases made in Australia from large well-known suppliers with sophisticated modern slavery policies already in place are deemed a low priority.

Specific risk of modern slavery in the Securitas Group operations

- Securitas Australia by the very nature of its business relies on multiple lines of products and services from third party vendors. These include, but are not limited to;
 - Security equipment including capital infrastructure and ancillary materials required for installations, such as cabling.
 - Uniforms for employees, and other tools of trade such as vehicles.
 - Labour hire.

As detailed in other parts of this MSS, Securitas Australia has an international supply chain, with its scope of supply diverse by way of product and geographical location. This by its very nature may create a modern slavery risk in the supply chain of products required to do business and cause or contribute / be linked to modern slavery. Whilst Securitas Australia sources its equipment/uniforms etc from local and overseas suppliers, it accepts the fact that these items are potentially manufactured internationally and with items such as clothing there is a perceived modern slavery risk. However, Securitas has refused to work with suppliers who fail to sign the required Values and Ethics Code and Business Partner Code of Conduct. In addition, such uniforms and other suppliers are large established business who by their nature and scope of work, would participate in programs for the global reduction of slavery risk and dealing with business who have unethical practices.

d The actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

Measures taken within the Securitas Group



Securitas Australia has implemented the following actions to minimise the risks of modern slavery in its business and supply chain:

- The new SRM tool and greater emphasis on trade sanctions processes;
- The introduction of its MS Policy;
- Reliance on greater global buying from the Securitas Group, which comes with greater vetting;
- Induction for new and current employees on the operation of the MS Policy;
- Ongoing training to all employees and targeted training to this working within the supply chain;
- Ongoing review of our labour practices, including:
 - engagement of contract labour only through ethical (and where applicable, registered) labour hire providers;
 - provision of direct, permanent employment wherever possible;
 - provision of a safe and non-discriminatory workplace;
 - ensuring that employees are lawfully able to work under Australian law
- Provision of the MS Policy to all current and new suppliers;
- Establishment of an internal team with legal, operational, human resources and procurement skills to ensure the MS Policy upheld; and
- Greater awareness and training on the Securitas integrity line.

At the recruitment stage, Securitas Australia ensures each candidate for employment has a right to work in Australia and is engaged in accordance with the requirements of the *Fair Work Act 2009* and all applicable safety legislation.

Securitas Australia has a range of policies covering workplace conduct, equal employment opportunity, bullying, and a whistle-blower policy. These policies have been in place and reviewed for a number of years, and are outlined in our Values & Ethics Policy.

Securitas Australia's measures taken with suppliers

In order to identify modern slavery risks in its supply chain for medium to high risk suppliers, Securitas Australia requires information from its suppliers, sub-contractors and business partners on:

- general information about business operations;
- any external certification information;
- labour practices;
- Work Health and Safety Practices;
- supply chain;
- grievance & redress mechanisms;
- response to any allegations and incidents; and
- potential remedy.

Securitas Australia requires this information to ensure compliance with:

- Supplier Code of Conduct; and
- MS Policy.

In addition to the above, suppliers and clients are subject to global sanction checks and compliance with the SRM process.



e How the reporting entity assesses the effectiveness of these actions

Securitas Australia employment practices

- Securitas Australia has implemented a suite of policies covering all aspects of the employment relationship, including equal employment opportunity, work health and safety, whistleblowing to ensure all employees are treated fairly and lawfully.
- Securitas Australia does not recruit individual security personnel such as sub-contractors or sole traders. Security professional are engaged only as an employee, with a written contract setting out standard terms and conditions and paid in accordance with minimum pay rates.

Labour Hire Providers / Suppliers

- Securitas Australia only engages labour hire firms licensed to operate in the relevant State and Territory under applicable labour hire licensing schemes.
- In respect of any risks within the supply chain, Securitas Australia seeks to consult with any supplier as set out above in accordance with its long-established *Global Securitas Values and Ethics Code and Business Partner Code of Conduct*.
- Securitas Australia is committed to consulting with a view to having suppliers comply with the MS Act, and being able and willing to satisfy Securitas Australia that any supplier does indeed comply.
- However, if Securitas Australia cannot secure a supplier's co-operation, then Securitas Australia will review whether it can continue to do business with a non-compliant supplier.

Commitment from the Country Leadership Team

This Statement has been endorsed by Securitas Australia's Country Leadership Team. This team oversees the national operation, including risks such as modern slavery. As detailed throughout this MSS, corporate policies and employment practices, including training requirements, highlight the values and ethics of Securitas Australia, which are aligned to mitigating and preventing modern slavery.

Risk Assessment

Whilst a risk of modern slavery may always be present, particularly in the supply chains that Securitas Australia utilises, on account of risk mitigation strategies in place, the deemed risk of modern slavery occurring within Securitas Australia's operations is low. This risk is determined by the processes and ethics of the global business in deciding who we do business with, the employment practices of Securitas Australia and controls in place by way of policies and procedures, and transparent business relations.

There is an additional layer of risk mitigation by the global and independent business ethics department of Securitas and the Securitas Integrity Line which is a tool that contributes to a healthy corporate culture, where people can see that their voice is heard and actions are taken accordingly.

Future planned work to mitigate modern slavery includes mapping the new and emerging supply chains and analysing such chains for modern slavery risk.

f The process of consultation with any entities the reporting entity owns or controls

- Based on the systems already in place within Securitas Australia, Securitas Australia has addressed any apparent or actual risk of modern slavery in its own business by applying the same standards across the Securitas Australia Group.
- This relates to the application of the same human resources policies, and application of the same practices with regard to recruitment that apply to Securitas Australia itself.
- As with suppliers, consultation is the key to engaging with any subsidiary companies within the Securitas Group.

g Other relevant information

- Securitas Australia will continue to require any new supplier to complete our Business Partner Values and Ethics Code Acknowledgement and co-operate with any further vetting if deemed by Securitas Australia to be a medium to high risk business in respect of modern slavery practices.
- Our Global values and Ethics Code places a strong emphasis on ethics, integrity and compliance and outlines the minimum standards that we require our business partners to comply with when doing business with us.
- Securitas Australia will prioritise its activity on reducing modern slavery risks on those suppliers who appear to be at high risk of having modern slavery practices. The primary focus remains on consultation with suppliers to improve any shortcomings with regard to modern slavery risks.



- In so far as the global Securitas business is concerned, Securitas' United Kingdom operations comply with the disclosure obligations under their *Modern Slavery Act 2015*.

Conclusion

This Modern Slavery Statement was approved by the principal governing body of Securitas Australia, the Country Leadership Team, on 30 November 2023.

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Country President
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Dated: 30 November 2023