MODERN SLAVERY STATEMENT

MSS Group

Reporting Period 2024

Date of Statement: December 2024

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ABOUT THIS STATEMENT

This Modern Slavery Statement is made pursuant to section 16 of the *Modern Slavery Act 2018* (Cth) ("the Act") jointly on behalf of SIS Australia Holdings Pty Ltd, ABN 65 132 211 459, and its below noted Australian subsidiaries (collectively, the "MSS Group"). It describes the actions taken by the "MSS Group" during the MSS Group 2022 to 2023 financial year ("2024 Reporting Period") to identify, mitigate and manage modern slavery risks in our business and supply chains. It is the fifth Modern Slavery Statement made by the MSS Group.

Operating Subsidiaries:

- MSS Security Pty Ltd, ABN 29 100 573 966 ("MSS Security")
- MSS Strategic Medical and Rescue Pty Ltd, ABN 48 155 387 152 ("MSS Strategic Medical and Rescue")

Joint Venture Subsidiary

- Habitat Security Pty Ltd, ABN 48 610 598 242 ("Habitat Security")

Other Subsidiaries:

- SIS Australia Group Pty Ltd, ABN 58 132 211 806
- SIS Group International Holdings Pty Ltd, ABN 89 600 112 490
- SIS MSS Security Holdings Pty Ltd, ABN 62 132 211 824
- MSS AJG Pty Ltd, ABN 50 610 598 251 (Deregistered 5 March 2023)
- Australian Security Connections Pty Ltd, ABN 80 160 045 189

Other Subsidiaries Not Covered

Although related bodies corporate of the MSS Group entities, this statement does not cover:

- Southern Cross Protection Pty Ltd, ABN 93 094 077 255 and its subsidiaries (collectively the "SXP Group"). The SXP Group supplies a separate statement

- Safety Direct Solutions Pty Ltd, ABN 19 110 817 117, which was recently fully acquired by SIS Australia Holdings Pty Ltd and is not yet covered by this Statement. The MSS Group is progressively working towards incorporating SDS into future modern slavery reporting to support greater consolidation and transparency.

OUR OPERATIONS

The MSS Group, which operates commercially through MSS Security, MSS Strategic Medical & Rescue and Habitat Security, is Australia's leading security and emergency response service company with a national infrastructure and offices in the capital cities of all states and territories.

MSS Security provides a full range of security services across key market segments, including:

Our security officers provide a visible presence, using a broad range of skills, from general guarding to highly specialised roles. Our 6,300+ strong workforce in Australia underpins a national service delivery footprint and provides the foundation for a comprehensive offering, which includes:

- Static guarding
- Roving and mobile patrols
- Aviation & maritime screening
- Emergency surge requirements
- Alarm response
- Events management
- Control room operations

- Access control
- Concierge services
- VIP protection
- First aid & medical support
- Traffic management
- Investigations
- CCTV and alarm monitoring

- Customer service security training
- Risk analysis & business continuity planning
- Security assessment, policy development & implementation
- Emergency response, planning, simulation & exercises

MSS Strategic Medical and Rescue is the specialist paramedical, emergency response and rescue division of the MSS Group. We provide qualified and trained paramedics, emergency response and rescue personnel to the heavy industrial, mining and resources sectors.

MSS Strategic Medical and Rescue also supplies specialised clinical emergency response advisory, clinical governance and medical consultation services for our various site-based occupational first aid responders, and emergency response and rescue and occupational first aid training. Key services offered include:

- **Emergency health services** – credentialed multi-disciplinary Paramedics, Registered Nurses/OHNs and Industrial Medics who hold competencies in emergency response and/or ERT support;
- **Site-based primary care practice** – on-site occupational health and hygiene, drug and alcohol testing, return to work and health promotion services;
- **Emergency response, fire and technical rescue services** – multi-disciplinary Emergency Response Officers (ERT Teams), including specialist ESO (fire and rescue) team leaders; and
- **Clinical/first aid, emergency response, fire and technical rescue training** – nationally accredited and non-accredited on-site instruction, and first aid supplies, paramedic and fire rescue equipment and logistics.

Habitat Security is a joint venture between an Indigenous entity, DMAC Workforce Consultancy, ABN 86 656 926 822, an indigenous minority individual shareholder and SIS MSS Security Holdings Pty Ltd, ABN 86 656 926 822. The joint venture emerged from our commitment to the Federal Government's Employment Parity Initiative (EPI) which:

- aims to increase Indigenous employment in large companies to reflect the proportion of the Indigenous population nationally;
- was created in response to the Government's drive to open opportunities for Indigenous-owned businesses as part of its Indigenous Procurement Policy; and
- supports the Government's commitment to real skills, sustainable employment, and economic growth to ensure prosperity for Indigenous Australians.

Operationally based in the ACT, Habitat Security specialises in providing security guarding and associated services, particularly to government departments and agencies.

OUR SUPPLY CHAIN

In the 2024 Reporting Period, the MSS Group allocated approximately $131.9 million towards supplies, engaging with 770 Tier 1, or direct, suppliers[1]. This expenditure covered a wide array of goods and services, reflecting the diverse needs of our operations. As in previous years, the largest share of our supply spend was directed to labour provider security subcontractors, reflecting the labour-intensive nature of our services.

The table below outlines our subcontractor expenditure, both in absolute terms and as a proportion of total supply costs. While subcontractor expenditure increased sharply between 2020 and 2021, the MSS Group has since taken deliberate steps to reduce reliance on subcontracting. This focus continued in the 2024 Reporting Period, with a material decrease in the total dollar value of subcontractor spend compared to 2023, even though subcontractors remain the largest single supplier group by proportion of spend.

Reducing subcontracting remains a central pillar of our strategy to mitigate modern slavery risks within our operations and supply chains. Further detail on our subcontractor management approach is set out later in this Statement (see pages 13 -16).

Table 1: Annual Security Subcontracting Expenditure Overview

Reporting Period	Total Supply Expenditure	Spend on Security Subcontracting	Percentage of Expenditure on Security Subcontracting
2020	$ 150 million	$ 117 million	78%
2021	$ 185 million	$ 152 million	82.2%
2022	$ 241 million	$ 188.4 million	78.2%
2023	$ 167 million	$ 123 million	73.6%
2024	**$131.9 million**	**$ 99.7 million**	**75.7%**

In our day-to-day operations, we continue to manage a relatively narrow and focused supply chain of goods and services to support our personnel and service delivery. This includes essentials such as travel and accommodation, uniforms and personal protective equipment (PPE), information and communications technology (ICT), fleet (vehicles), equipment, property leasing, professional services, training, recruitment, and other staff-related expenses.

The vast majority of our primary (Tier 1) suppliers remain Australian companies and individuals. However, we recognise that certain products, particularly uniforms, PPE, ICT equipment, vehicles, and consumables, are sourced internationally — predominantly from regions within Asia. Importantly, many of the suppliers engaged in overseas procurement activities are large organisations that are themselves subject to the Australian modern slavery legislative framework.

At the other end of our Tier 1 supplier spectrum, we also engage small-spend vendors who typically provide one-off goods or services for amounts of $5,000 or less. During the 2024 Reporting Period, just under half of our Tier 1 suppliers fell into this category. A significant portion of these smaller transactions involved reimbursements to our own employees, who are established as vendors in our accounts payable system to process expenses such as consumables, parking, taxi fares, memberships, or attendance at training courses and conferences.

ASSESSING MODERN SLAVERY RISKS

The MSS Group maintains a proactive approach to identifying and mitigating modern slavery risks across our operations and supply chains. In 2019, we established a dedicated Working Group comprising representatives from our legal,

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[1] This excludes inter group subcontracting – for example, where MSS Strategic Medical and Rescue supply services to MSS Security.

operational, procurement, HR, IT and other relevant business areas. The Working Group is responsible for conducting due diligence activities and maintaining a strategic action plan to address modern slavery risks.

Beginning in the 2020 Reporting Period, the Working Group undertook a high-level risk assessment of our Tier 1 suppliers and direct operations. By the 2021 Reporting Period, the initial Tier 1 review was completed, and the Working Group has since expanded its review to selected Tier 2 suppliers and beyond.

Across the 2020 to 2024 Reporting Periods, the Working Group's risk assessments have drawn on authoritative resources and industry-specific risk factors, including:

- drawing on insights from recognised human rights resources, particularly the *Global Slavery Index*[2], which provided a foundational and comprehensive understanding of the risks and specific vulnerabilities within various industries. This informed our analysis of potential vulnerabilities within the security industry;
- identifying vulnerable groups within the security industry supply chain who may be at greater risk of exploitation, such as low-skilled personnel, migrant workers, and non-native English speakers[3];
- analysing sector and industry risks, particularly in informal and unregulated industries like cleaning[4], which share similarities with the security sector in terms of some employment practices and worker vulnerabilities;
- evaluating risks associated with products and services used in connection with the delivery of security services including ICT products, uniforms, PPE, vehicles, travel and staff recruitment and training services[5]; and
- conducting geographical risk assessments[6] to identify regions where modern slavery practices are more prevalent and may influence supply chains in the security industry.

Drawing on these insights, the Working Group reached the following conclusions:

- the security industry, which is our primary industry, carries inherent risks of modern slavery practices. This is partly due to the lower skill requirements of some security roles, which make them more accessible to vulnerable groups, including individuals with limited knowledge of workplace rights, limited social networks, and non-native English speakers;
- without suitable safeguards there remains a risk that unscrupulous and unethical businesses, including those in Australia, may exploit vulnerable workers; and
- whilst the MSS Group itself has implemented, and continues to implement, effective measures to mitigate against the potential risks of modern slavery within our direct operations, there remains a concern that these protections may not extend fully to the entirety of our supply chain, particularly our security subcontractors. This segment of our supply chain therefore requires continued and targeted scrutiny.

In the 2024 Reporting Period, the Working Group continued to maintain oversight of these broader supplier categories and integrated the insights gained from the 2023 review into its overall risk management approach. Although operational demands during 2024 limited the ability to undertake further expanded reviews, the MSS Group remains committed to progressively deepening its understanding of supply chain risks and to building on the work initiated in prior periods.

The table overleaf provides an overview of the broad and diverse supplier categories within our supply chain, highlighting expenditure percentages, supplier locations, and potential modern slavery risks. This ongoing analysis reinforces our commitment to identifying and addressing modern slavery risks

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[2] Global Slavery Index 2023 https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf

[3] See, for example the Australian Council for Superannuation Investors Modern Slavery Risks, Rights and Responsibilities: A Guide for Companies and Investors (KPMG survey) https://assets.kpmg/content/dam/kpmg/au/pdf/2019/modern- slavery-guide-for-companies-investors-feb-2019.pdf

[4] For example see https://www.cleaningaccountability.org.au/wp-content/uploads/2020/12/CAF_ModernSlaveryGuidance_Contractors_v1.0.pdf; and Australian Border Force *Addressing Modern Slavery in Government Supply Chains – A Toolkit of Resources for Government Procurement Officers* available at https://modernslaveryregister.gov.au/resources/

[5] We relied on the *Global Slavery Index* and the following resources: https://informed365.com/modern-slavery-exposed-in-big-tech-supply-chains/ and https://bhr-navigator.unglobalcompact.org/issues/forced-labour/industry-specific-risk-factors/; https://www.fieldfisher.com/en/insights/modern-slavery-in-the-travel-industry; https://www.value-match.co.uk/modern-slavery-in-the-car-manufacturing-industry-examining-forced-labour-and-human-trafficking-in-supply-chains/;

[6] Based on the *Global Slavery Index*

Table 2: Tier 1 Supplier Expenditure Analysis, Profile and Modern Slavery Risk Analysis

Supplier Category	% of Expenditure	Location of the Supplier	Supply chain location (if known)	Potential modern slavery risks[7]
All	100%	Australia – for the vast majority	Products used by all suppliers, particularly, ICT products, office consumables and vehicles are sourced globally.	No supplier, even suppliers of professional services, are immune to modern slavery risks given that all our vendors rely on a variety of goods and services to operate. These range from office cleaning to office supplies/consumables, vehicles and ICT and electronic products where there are known risks of modern slavery.
Security Subcontractors	75.7%	Australia	Australia, however, the above also applies.	Subcontracting may exacerbate the modern slavery risks in the security industry (see page 6 above) owing to reduced oversight and a dilution of the direct employment accountability that is more robust in our direct operations.
Perimeter security services incorporating advanced detection and AI technology	5.32%	Australia	Australia, however, the above also applies.	Potential risks range from exploitation in complex supply chains and AI training labour abuses to ethical deployment concerns, worker displacement and regulatory gaps. These risks illustrate the intricate relationship between technological progress and human rights and highlight how components and labour from regions with weak employment protections and rapid tech deployment can challenge ethical standards.
Professional services including consultant, legal and accounting services, memberships and subscriptions, advertising and sponsorships	1.90%	Australia	Australia but some service providers may have offices or staff located overseas, including regions where there are known modern slavery risks. Also, many day-to-day products used are sourced globally.	Direct risks of modern slavery are low due to a generally highly skilled workforce.
ICT – IT, communications and electronic products, services and licences	2.18%	Mainly Australia but some vendors of software are from India and the USA	Various - including China, Malaysia, Vietnam, Philippines, India, the USA Europe and Australia	Communications, IT electronics and related industries rely on complex supply chains for sourcing electronic components. These components are often sourced from countries or regions with relatively high risks of modern slavery practices. The complexity and risk are further compounded by demands for many components and products, rapid technological advancements, and the pressure to minimise costs and speed up production. In contrast, the risk of modern slavery in the licensing of software is considerably lower. This is because software licensing revolves around intellectual property and digital products which do not require the kind of physical labour associated with modern slavery practises.

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[7] As informed by an analysis of the resources referenced in foot notes 2 to 5 on the prior page.

Category	%	Origin	Sourcing	Risk
Property related costs including leasing, fit out, maintenance, cleaning, and outgoings	2.49%	Australia	Australia but many day-to-day products used are sourced globally.	While direct risks associated with leasing appear to be low, there are risks in related areas, for example: • cleaning: labour exploitation in the cleaning industry is well-documented and cleaning services have been identified as a key area for modern slavery; and • building and maintenance: there are also documented risks in the property and construction section, particularly in building and maintenance work. The risks stem from the industry's complex chains and use of subcontractor and migrant labour which can obscure employment practices and oversight.
Staff related costs (including training, recruitment, reimbursements, medicals, amenities) and memberships,	2.1%	Australia	Australia but many day-to-day products used are sourced globally.	The training sector has a lower risk of modern slavery due to its skilled workforce. The associated recruitment industry can be vulnerable to modern slavery risks through activities such as charging excessive fees leading to debt bondage, deceptive practices and document withholding, restricting worker mobility.
Travel - air fares, accommodation, vehicle rental and parking	1.92%	Australia	Australia but some costs relate to overseas travel and accommodation (India, Singapore and New Zealand). Also, many day-to-day products used are sourced globally.	The travel and accommodation sectors are susceptible to modern slavery risks due to the service-oriented nature of their operations, pressures to minimise costs and reliance on low skilled and migrant labour. These factors can lead to situations where some workers, especially those in housekeeping, maintenance, catering, or food service roles, may face unfair treatment, underpayment or coercion.
Fleet/vehicle	1.74%	Australia	Various - including Japan, South Korea, China, India, Thailand, Germany, Vietnam, the USA and Australia.	The car manufacturing industry presents a high risk of modern slavery. This is primarily due to its complex supply chains and reliance on raw materials and components sourced from regions where forced labour and human rights abuses occur. Well documented concerns include forced labour and human trafficking in the production of vehicles.
Credit Card payments	1.17%	Australia	Australia - but banks also operate globally and outsource operations to various countries including India and the Philippines and products used by banks come from overseas.	Whilst credit card transactions themselves may not appear to be associated with modern slavery, the broader financial sector faces modern slavery risks through global investments and business relationships, including lending and insuring businesses potentially involved in modern slavery practices. Risks arise from indirect connections to sectors known for such practices, reliance on complex supply chains and the outsourcing of services.
Uniforms and PPE	1.5%	Australia	Various including China, Indonesia, Bangladesh, India and Australia.	The garment industry is particularly vulnerable to modern slavery practices including forced labour, child labour and exploitative practices within supply chains. These risks are compounded by complex global supply chains where limited visibility and control over working conditions exacerbate vulnerabilities.
Consumables, medical consumables, office supplies & general expenses	0.88%	Australia	Various, including Australia, China, India, Malaysia, Thailand, USA, Germany, and Vietnam.	The risks referenced above that apply to the garment industry equally apply to the sourcing of many office supplies and other consumables.
Other	3.10%	Australia	This varies but as noted above, day-to-day products used are sourced globally.	The risks vary – depending on the relevant products or services procured.

ADDRESSING RISKS - AREAS OF FOCUS

Despite the comprehensive review and identification of modern slavery risks across our various suppliers, the Working Group determined that maintaining and further strengthening our primary focus on the security subcontracting sector remained critical during the 2024 Reporting Period and beyond. This approach continues the deliberate strategy we have pursued over the past several years, but with a renewed emphasis on driving deeper engagement, improved oversight, and enhanced subcontractor management practices.

A key achievement across the 2022 to 2024 Reporting Periods has been the sustained reduction in our reliance on subcontracted labour. Total subcontractor spend has materially decreased over this period, directly supporting our broader strategy to mitigate modern slavery risks by strengthening direct employment relationships and improving transparency and accountability over labour practices.

This focus reflects two principal considerations: first, the security subcontracting sector remains the most significant portion of our supply chain; and second, it continues to present the greatest opportunity for the MSS Group to have a meaningful and positive influence on modern slavery risk mitigation.

In parallel, the Working Group reaffirmed the importance of progressively broadening our modern slavery risk management efforts beyond subcontracting. While operational demands in the 2024 Reporting Period limited the pace of expansion into broader supplier categories, the MSS Group made incremental enhancements to existing governance measures and remains committed to strengthening supplier engagement and risk assessment frameworks across a wider range of goods and services categories over time.

ADDRESSING RISKS - OUR DIRECT OPERATIONS

The MSS Group maintains a zero-tolerance stance against any form of modern slavery, firmly rejecting its occurrence within any part of our business or supply chains. We are committed to identifying, assessing, and addressing risks associated with modern slavery and to implementing and enforcing reasonable, practical and effective systems and controls to minimise the possibility of modern slavery taking place anywhere in our own business or supply networks.

The nature of modern slavery risks within our direct operations differs significantly from those within our supply chains. Our workforce is directly employed in compliance with Australian laws, including the *Fair Work Act* 2009 (Cth) and applicable modern awards and enterprise agreements. These legal frameworks place responsibility on us, as an employer, to ensure the fair treatment of employees and the provision of minimum employment standards, including:

- minimum rates of pay and applicable allowances;
- superannuation contributions;
- ordinary hours of work and protections against unreasonable additional hours
- minimum break periods between shifts and entitlements to meal breaks during shifts;
- appropriate overtime payments and protections relating to overtime hours;
- leave entitlements, including annual leave, personal leave, parental leave and long service leave; and
- notice periods and protections against unfair dismissal.

In addition to meeting minimum standards, we are required to uphold workplace rights relating to:

- freedom from undue influence or pressure in negotiating individual agreements;
- protection against adverse action, coercion, misrepresentation, and undue influence in relation to employment terms, individual flexibility arrangements, and wage deductions
- freedom from unlawful discrimination, harassment and bullying;
- the right to a safe and healthy work environment; and
- the right to membership of a trade union and engagement in industrial activities.

Direct employment enables the MSS Group to exercise comprehensive oversight across the entire employee lifecycle - from recruitment and onboarding through to training, performance management, and workplace health and safety. This oversight supports transparency, promotes fair labour practices, and enables prompt action where required.

Our dedicated People and Culture team plays a critical role in maintaining compliance with workplace obligations. Activities undertaken by the team include:

- recruiting specialised and suitably qualified personnel;
- conducting regular reviews and audits of employment contracts, onboarding processes, and workplace documentation;
- ensuring that HR systems, policies, and procedures are updated to reflect legal requirements and best practices;
- facilitating employee feedback through structured grievance mechanisms, employee surveys, and engagement programs; and
- investigating and addressing any concerns raised through these mechanisms promptly and fairly.

Further safeguards with respect to our direct operations include those set out below.

Environmental, Social and Governance (ESG)

Environmental, social and governance (ESG) factors are integral to the MSS Group's operations and governance framework. Our ESG approach builds on our established Corporate Social Responsibility (CSR) framework, which is documented in our annual Corporate Sustainability Report. Through this framework, we are committed to high ethical standards, sustainable business practices, human rights, workplace health and safety, diversity and inclusion, Indigenous engagement, environmental stewardship, and governance excellence.

Corporate Social Responsibility (CSR) remains a critical component of our ESG approach. Our CSR framework is structured around nine key pillars, including excellence, community, environment, diversity, Indigenous betterment, sustained employment, employee wellbeing, governance and compliance, and future focus initiatives. These pillars guide our actions to create lasting positive impacts for our employees, clients, communities, and the environment.

During the 2024 Reporting Period, the MSS Group maintained ISO 14001:2015 environmental certification and continued strengthening its internal systems for environmental sustainability reporting. We also worked to build on earlier environmental benchmarking activities, identifying opportunities to reduce emissions, improve resource efficiency, and enhance waste and water management. Although our environmental reporting systems continue to mature, we are committed to continuously improving transparency, governance, and responsible operational practices across all areas of ESG.

Employee Code of Conduct

Our Employee Code of Conduct expresses a comprehensive statement of expectations covering standards, behaviour, and governance. It is an expression of fundamental values and represents the framework for decision-making for every employee.

The Code establishes the following ethical business practices:

- we will comply with the law;
- we will act in good faith;
- we will consider the impact of our decisions on our stakeholders (members, employees, customers, governments, and the broad community) and seek fair resolutions;
- we will communicate openly and effectively with our stakeholders; and
- we will seek always to build trust, show respect, and perform with integrity.

We implement the Code of Conduct through policies, procedures and processes which are used throughout our operations. Our integrity, reputation and profitability ultimately depend upon the individual actions of our directors, officers, employees, and representatives. Each is personally responsible and accountable for compliance; and we monitor compliance with our Code of Conduct and promptly act on any breaches.

Policies, Procedures and Processes

Effective governance practices are embedded throughout our organisation via a comprehensive suite of policies and procedures which sustain corporate social responsibility. Mechanisms that are relevant for the purposes of identifying and minimising the risks of modern slavery include the following:

Modern Slavery Policy

Our Modern Slavery Policy:

- provides awareness of what modern slavery encompasses;
- encourages individuals to be on the lookout for and report suspected acts of modern slavery;
- details the responsibilities of all stakeholders including directors, managers, employees and subcontractors;
- explains how concerns may be raised and how they will be dealt with; and
- sets out the consequences of non-compliance.

Whistleblower Policy and Procedure and Other Disclosure Schemes

Under our Whistleblower Policy "Eligible Disclosers" who have reasonable grounds to suspect any misconduct or improper state of affairs or circumstances, are encouraged to report their concerns without fear of retaliation.

Eligible Disclosers include past and present employees, officers, associates, contractors or suppliers and their respective family members. Their concerns may include suspicions with respect to certain modern slavery practices. Concerns may be raised with a number of identified personnel or bodies and may also be made through a confidential hotline managed by a third party; this helps to protect the anonymity of whistleblowers and also protects data privacy.

There have been no modern slavery issues disclosed or reported since the policy was introduced.

As a supplier of security services to the Commonwealth and to all State and Territory Governments in Australia, we also comply with and promote public interest disclosure schemes. These schemes were implemented by the Governments to encourage and facilitate disclosures of wrongdoing in the public sector, support and protect those who make disclosures, ensure disclosures are properly investigated and promote integrity and accountability.

Grievance Policy

In August 2022 a stand-alone Grievance Policy and Procedure was implemented. Prior to this time a form of grievance procedure was set out in our employee handbook, known as the "Employee Standing Instructions".

The Grievance Policy explains how employees can voice their grievances in a constructive manner to ensure a supportive and harmonious culture and to reinforce the MSS Group's commitment to handle complaints and grievances with integrity and fairness and in a transparent and timely manner.

Other Relevant Policies

Other relevant policies and protocols have been reviewed to ensure they are aligned on modern slavery and human rights including our:

- Anti-Fraud and Corruption Policy;
- Child Safe Environment Policy;
- EEO, Discrimination, Harassment and Bullying Policy;
- Fatigue Management Policy;
- Recruitment Policy; and
- Work Health and Safety Policy.

Adherence to the Voluntary Principles on Security and Human Rights

Established in 2000, the *Voluntary Principles on Security and Human Rights* ("Voluntary Principles") are a set of principles designed to guide companies in maintaining the safety and security of their operations within a framework that encourages respect for human rights. Whilst not holding a formal subscription, the MSS Group adheres to the Voluntary Principles. To this end, to ensure that we comply with human rights ethics set out in the Voluntary Principles, we seek to:

- communicate effectively with our personnel;
- maintain high levels of technical and professional proficiency;
- act in a lawful manner and exercise restraint and caution;
- have, and observe, policies and procedures regarding appropriate conduct;
- record all allegations of human rights abuses; and
- conduct proper investigations, and report accordingly.

Employment Entitlements Independent Review

In the 2023 Reporting Period, the MSS Group engaged an independent auditor to undertake a comprehensive review of our practices relating to the payment of employee entitlements. This initiative was part of our broader commitment to strengthening compliance with applicable industrial instruments, the *Fair Work Act 2009* (Cth), and other employment-related obligations.

The audit was extensive and covered broad grounds including the following:

- an evaluation of employee compensation clauses, including those regarding base pay, penalties, allowances, overtime and superannuation contributions. The analysis included a rapid diagnostic analysis and sample testing;

- a series of risk-based data analytics tests over specific employee cohorts to identify areas where underpayments could be made;

- a desk top review of active wages codes in the payroll system, to assess how they have been configured with respect to the Superannuation Guarantee (SG). This involved analysing the MSS Group's internal payroll configurations for SG contributions;

- separate wage code completeness and accuracy reviews; and

- performance of targeted sample testing across four pay periods comparing the MSS Group's payroll data with the auditor's independent calculations.

The audit identified some isolated issues, but no systemic or widespread underpayments. A number of improvement recommendations were made, which are being progressively reviewed and incorporated into our payroll governance framework.

Training

Our ability to understand and respond to modern slavery and broader human rights issues depends on the identification and reporting of relevant concerns. It is therefore imperative that employees, suppliers, subcontractors, and other relevant stakeholders develop a clear understanding of what modern slavery issues are, how to identify them, how to report them, and how the MSS Group will respond.

Sections on modern slavery were first developed for inclusion in our compulsory e-learning induction training for direct employees in the 2020 Reporting Period, with rollout commencing in 2021. All employees are required to complete this training at the commencement of their employment, and to undertake annual refresher training thereafter. Employees also receive training in relation to our whistleblower scheme, and relevant personnel are trained in the public sector public interest disclosure regimes.

During the 2023 Reporting Period, we undertook a high-level review of our modern slavery training materials and identified areas for improvement. We also received anecdotal feedback suggesting that employees may not always adequately recall the modern slavery content, highlighting broader challenges with training engagement and retention.

In response, the Working Group commenced collaboration with our training personnel to update the materials and explore enhancements to training methodologies, with the goal of fostering a stronger culture of awareness and responsiveness to modern slavery and human rights risks.

Due to competing priorities during the 2024 Reporting Period, limited progress was made in implementing the planned updates. However, improving the effectiveness and engagement of modern slavery training remains a priority, and work on this initiative will continue into the next reporting period.

New Initiatives

New Rostering/Time and Attendance System - Workforce System

As part of our ongoing efforts to strengthen governance and mitigate the risk of isolated payroll or rostering errors, the MSS Group is implementing a new rostering and time and attendance system called **"Workforce"**. This system is expected to enhance the accuracy, consistency, and transparency of our payroll and rostering processes. For example, it will include built-in controls to alert rostering personnel to certain irregularities so that timely corrective action can be taken.

Importantly, the system is also expected to improve our visibility over subcontractor employee deployments, which

will support greater assurance that subcontractor arrangements are consistent with contractual and ethical expectations. This is particularly relevant to our efforts to identify and mitigate modern slavery risks within our extended workforce.

Although initial implementation was targeted for May 2024, unforeseen delays arose due largely to third-party disruptions. As a result, implementation has been rescheduled for 2025.

Once fully operational, the system is expected to play a meaningful role in supporting ethical workforce management and reinforcing our commitment to safeguarding the rights and well-being of both our employees and subcontractor workers.

New Human Resources Information Management System – The Workday System

During the 2024 Reporting Period, the MSS Group completed the implementation of a new Human Resources Information Management System (HRIMS), Workday, to support our goals of growth, sustainability, and improved employee experience. The system was launched in late 2023, with some transition challenges initially encountered and now largely resolved.

Workday improves the accuracy, consistency, and accessibility of workforce data and provides authorised personnel with real-time visibility of our workforce. It also integrates with our training systems, enabling better tracking of training completion rates and compliance with mandatory learning, including modern slavery training. This supports stronger accountability and helps ensure that relevant content is completed by the appropriate personnel.

While the implementation of Workday was not specifically driven by modern slavery considerations, it is contributing to our broader human rights and governance framework. By improving transparency, recordkeeping, and access to employee-related data and training metrics, the system strengthens our ability to monitor workforce practices and identify potential risks more effectively.

ADDRESSING RISKS - OUR SUPPLY CHAIN

The MSS Group considers that, due to potential gaps in suitable safeguards, certain segments of our supply chain, particularly our security subcontractor suppliers, may be more susceptible to modern slavery practices compared to our direct employees. Consequently, our primary focus during the 2023 Reporting Period, consistent with previous periods, focused on implementing, improving and maintaining measures to mitigate risks associated with security subcontractor suppliers, in line with recommendations of the Working Group.

Addressing Risks with Key Suppliers - Security Subcontractors

Since the 2020 Reporting Period, the MSS Group has introduced and progressively strengthened several measures to manage and mitigate modern slavery risks associated with our security subcontractors. In 2023, we also initiated a strategic shift towards reducing our overall reliance on subcontractor labour. This strategy complements, rather than replaces, the broader risk mitigation measures outlined below.

National Subcontractor Management Program

Historically, the MSS Group managed security subcontractors on a state or territory basis, resulting in inconsistencies across the business. Recognising this, a unified national subcontractor management program was developed, piloted, and progressively enhanced between the 2020 and 2023 Reporting Periods. This program introduced national standards for subcontractor authorisation, onboarding, compliance management, auditing, and reporting.

During 2024, the MSS Group progressed development work on an enhancement to its subcontractor management program, focused on improving training compliance and workforce oversight. This enhancement involves the integration of our subcontractor management system with our Human Resources Information Management System, Workday.

The integration moved into production during 2024 and will be formally introduced and operationalised in early 2025. Under this enhancement, subcontractor organisations input workforce data into a centralised system, automatically triggering enrolment of subcontractor employees into required learning modules, including a subcontractor-specific induction and any site-specific training. Managers and administrators will have real-time visibility over training

completions through Workday, and weekly training compliance reports will be distributed nationally.

These developments strengthen our ability to ensure that subcontractor employees meet our operational and compliance standards, support ethical labour practices, and reinforce our commitment to mitigating modern slavery risks within our extended workforce.

The subcontractor management program remains the cornerstone of our strategy to mitigate modern slavery risks. It is fundamental to how we manage, monitor, and set clear expectations for subcontractor compliance with labour standards, human rights requirements, and ethical practices.

Authorised Subcontractors Only

All subcontractors must be formally approved as "authorised subcontractors" through a comprehensive authorisation process covering operational capability, financial viability, licensing, insurance, training, and compliance with applicable employment and modern slavery laws.

Due Diligence and Vetting

Subcontractor vetting is conducted nationally through a multi-stage process. Prior to any engagement, the following checks are performed:

- **Compliance Check**: Verification that the subcontractor is a legitimate operating entity, is a member of a security industry association, has correct and up to date licences, and that its employees have suitable qualifications and licences and the right to work in Australia;

- **Financial Health Review**: Examination of the subcontractor's financial reports to ensure it is a viable operator;

- **Insurance Confirmation**; Verification that the subcontractor maintains appropriate, up to date and valid insurances;

- **Background and Policy Review**: Analysis of the subcontractor's historical performance, background, policies and operational processes;

- **Industrial Instrument Review**: in appropriate cases, evaluation of the employment agreements and or enterprise agreements used by the subcontractor with respect to the employment of its employees to check compliance with applicable laws;

- **Premises Visit:** Inspection of the subcontractor's base to assess suitability in appropriate cases; and

- **Interview**: Conducting discussions to outline our requirements and expectations and to assess the subcontractor's ability to meet these demands.

The MSS Group applies a risk-based approach to subcontractor engagement. While full due diligence is conducted for ongoing or higher-risk subcontractors, a streamlined process is applied to smaller subcontractors or those engaged for short-term, low-risk purposes. These subcontractors are still subject to key checks and compliance requirements, but the process is simplified to match the scale and duration of the engagement.

Subcontract

In 2019, the MSS Group introduced a new standard subcontract agreement, which was progressively enhanced during the 2021 and 2022 Reporting Periods. The current form includes explicit provisions relating to modern slavery compliance, WHS obligations, fair work principles, and a prohibition on sham contracting. Full implementation of the new standard subcontract was finalised in 2023.

The MSS Group also uses a short form subcontract for smaller subcontractors or one-off engagements, such as event-specific or limited-duration work. While this version is more concise and administratively streamlined, it preserves all critical legal, ethical and compliance obligations, including those relating to employee entitlements, modern slavery laws, and safety standards. The short form provides a proportional alternative within our risk-based subcontractor governance framework, without compromising on key expectations.

Policies, Procedures and Processes

Our security subcontractors are required to comply with our relevant policies and procedures, in particular, our Modern

Slavery Policy, our Whistleblower Policy and Procedure, our Grievance Policy and our Work Health and Safety Policy. These policy obligations are embedded in subcontracting agreements, and subcontractors are encouraged to implement equivalent internal procedures.

Training

All subcontractor employees are enrolled in the MSS Group's mandatory Subcontractor Induction module. This e-learning program mirrors our employee induction but has been adapted for subcontractor use by removing internal employment-specific content and adding guidance relevant to subcontracted roles.

During the 2024 Reporting Period, the MSS Group commenced work on integrating its subcontractor management platform with our Human Resources Information Management System, Workday, to improve the assignment and tracking of subcontractor training. While the integration was not yet fully operational in 2024, development progressed, and the system was in production testing during the latter part of the year.

Once implemented, the integration will allow subcontractor organisations to enter workforce data directly into a centralised system, triggering automated enrolment into relevant training modules based on work location and role. Managers and subcontractor administrators will be able to view learning completions in real time, supported by weekly reporting across the business.

Regular Declarations

Our security subcontractors are required to provide periodic statutory declarations confirming (amongst other things) that:

- all employees of the subcontractor have been paid all amounts due to them under law (including all remuneration and superannuation due);

- the subcontractor has paid all workers compensation premiums;

- the subcontractor has conducted its business in a manner that is compliant with modern slavery laws; and

- the subcontractor has done all things reasonably required to reduce modern slavery risks in its operations and supply chains.

Regular Audits

A national subcontractor audit framework was finalised in 2022 and implemented during 2023. Subcontractors are required to undergo an annual audit to retain authorisation.

Audits typically include:

- a financial records review;

- confirmation of up-to-date insurance, licences and qualifications;

- sample checks of employee pay and conditions; and

- interviews with subcontractor employees (where appropriate).

During the 2024 Reporting Period, fewer audits were completed than originally planned due to competing operational demands. Extending audit coverage is a key focus for the coming year.

The MSS Group has also developed a streamlined audit and monitoring approach for smaller and regional subcontractors. This proportionate model ensures that while core requirements are upheld, compliance efforts are scaled appropriately based on risk and duration of engagement.

Annual Subcontractor Questionnaire

All prospective subcontractors seeking authorised status, and existing authorised subcontractors seeking to retain that status, are required to complete an annual online questionnaire. The purpose of the questionnaire is to confirm compliance with legal obligations, including:

- modern slavery laws,

- labour hire licensing requirements,

- the Fair Work Act 2009 (Cth), and

- workplace health and safety legislation.

Originally implemented in 2019, the questionnaire was subsequently updated to include more detailed questions specific to modern slavery risks. It remains a key part of our national subcontractor management program and supports a risk-based approach to supplier governance.

ASIAL Subcontracting Code of Practice

The Australian Security Industry Association (ASIAL), the peak body for security professionals, developed a *Subcontracting Code of Practice* which took effect on 1 July 2021. The Code aims to:

- promote compliance with legislative requirements,

- eliminate sham contracting,

- protect vulnerable workers from exploitation, and

- improve business practices across the industry.

The MSS Group was actively involved in the drafting of the Code and remains fully compliant with its provisions. We continue to support ASIAL's objectives and apply the Code as part of our subcontractor governance framework.

Increased Direct Employment Initiative

In 2023, the MSS Group initiated a strategic shift in our workforce model to reduce our reliance on subcontracted labour wherever practical. This decision reflects our recognition of the inherent risks in subcontracting and our commitment to promoting ethical labour practices, worker engagement, and workforce stability.

On any given day, we typically engage up to 900 subcontractor employees - although this number may increase during major events or national emergencies. Our aim is to gradually reduce this reliance over time by increasing our pool of directly employed personnel, who currently number approximately 6,300.

This transition is informed by industry dynamics that have historically required the use of subcontractors for specific, often unpredictable needs such as event security, short-notice surge deployments, or remote coverage. While we acknowledge that subcontracting will remain necessary in some contexts, our clear direction is to expand direct employment where feasible and sustainable.

We are working closely with clients to ensure they understand and support this shift, especially where a move to direct employment may increase costs. We believe this approach not only improves modern slavery risk management, but also enhances service consistency, operational resilience, and alignment with MSS Group's core values.

Addressing Risks with Key Suppliers - Other Suppliers

During the 2020 to 2023 Reporting Periods, the MSS Group prioritised risk mitigation strategies focused on our security subcontractors, as outlined earlier in this Statement. While this focus remains central to our modern slavery risk management approach, we have also taken steps in recent years to extend oversight to other suppliers across our broader supply chain.

Progress in this area during the 2024 Reporting Period was limited due to competing operational priorities. Nonetheless, foundational measures remain in place, and we remain committed to strengthening this aspect of our modern slavery framework in future reporting periods

Standard Contract Precedent Updates

Over recent years, we have systematically updated our contract precedents to incorporate clauses addressing modern slavery risks and expectations. These revised precedents continue to be rolled out progressively as new supplier arrangements are formed or existing contracts are renewed or renegotiated.

Contract Management

We have previously collaborated with some of our key suppliers, including those in uniform supply and software, to incorporate targeted measures aimed at identifying and mitigating modern slavery risks. These efforts have included efforts to reduce exposure to high-risk jurisdictions as identified in the Global Slavery Index. While no additional supplier-specific risk management initiatives were undertaken in 2024, these relationships provide a useful foundation for future engagement and follow-up.

Supplier Questionnaire

In the 2022 Reporting Period, we finalised a supplier questionnaire designed to assess modern slavery risks and related issues. The questionnaire was piloted in 2023 with a sample of higher-risk suppliers, and adjustments were made based on feedback and outcomes. The intention remains to use the questionnaire as a key due diligence tool with selected suppliers in future periods, particularly where elevated modern slavery risks are identified. Rollout beyond the pilot stage was not progressed during 2024 due to competing demands and focus on subcontractor related initiatives.

Supplier Code of Conduct

A Supplier Code of Conduct, applicable to all MSS Group suppliers and their agents and subcontractors, was developed in 2022, refined in 2023, and formally adopted in 2024. The Code outlines specific expectations relating to labour practices, human rights, and modern slavery compliance. While formal implementation commenced in 2024, further engagement and integration of the Code into supplier onboarding and monitoring processes is expected to occur in future reporting periods.

ADDRESSING RISKS - WORKING WITH OUR CLIENTS

Beyond our internal efforts to mitigate modern slavery risks in our direct operations and supply chains, the MSS Group continues to work collaboratively with many of our clients to support their own ethical sourcing and human rights objectives. These relationships provide an important platform for transparency, joint problem solving, and alignment of expectations.

In 2024, we reaffirmed our commitment to client-led accountability frameworks, including:

- responding to client inquiries through modern slavery-related questionnaires and surveys;

- participating in client-led audits, reviews and due diligence activities;

- engaging in meetings and discussions with clients around sustainability, ethical sourcing and labour rights risks;

- participating in evaluations by recognised global sustainability platforms such as Sedex and Eco Vadis, as requested by clients; and

- tailoring training and awareness resources where required to meet client-specific expectations.

- making a formal commitment to undertake a Sedex SMETA audit as part of our broader supply chain governance and transparency objectives.

We also successfully completed a Human Rights-focused Workplace Conditions Assessment (WCA) by Intertek. This audit assessed our compliance with labour standards and related obligations at selected client sites. The MSS Group achieved an overall score of 100%, with no findings of non-compliance across any category, including Labour, Wages & Hours, and Management Systems. The assessment recognised best practices in areas such as employee engagement, payroll accuracy, and internal governance.

In addition to the Intertek audit, we participated in other customised client audits covering modern slavery, human rights and ethical practices. In all cases, we either met or exceeded client expectations, with no adverse findings.

We value the role our clients play in promoting higher standards across the industry and are committed to maintaining transparency, openness and accountability in our interactions with them. These collaborations help us strengthen our own systems and reinforce the MSS Group's broader commitment to ethical service delivery.

ADDRESSING EFFECTIVENESS

The MSS Group remains committed to continuous improvement and accountability in its efforts to identify, assess, and address modern slavery risks across our operations and supply chains. As our governance framework matures, we continue to refine the methods we use to assess effectiveness and ensure our actions are both measurable and impactful.

Our multifaceted approach to assessing effectiveness includes:

- regularly reviewing and evaluating our modern slavery strategy and action plan through the Modern Slavery Working Group;

- undertaking periodic and independent reviews, such as the employment entitlements audit referenced earlier, and using those findings to inform strategy and compliance enhancements;

- verifying that all subcontractors are formally authorised through our national subcontractor management program, with no unauthorised engagements;

- tracking completion rates of modern slavery training for all direct employees;

- monitoring completion rates of modern slavery training by subcontractor employees and providing weekly reports for operational follow-up;

- collecting feedback from modern slavery training to assess relevance, clarity, and engagement;

- monitoring the adoption of modern slavery policies and awareness efforts by subcontractors;

- conducting audits of subcontractors, with a focus on wage compliance, legal obligations, and worker interviews;

- reviewing responses from our annual subcontractor questionnaire to identify potential red flags or improvement opportunities;

- monitoring whistleblower disclosures and grievances relating to potential labour rights or modern slavery risks, including frequency, nature, and resolution trends;

- engaging with key clients to obtain feedback on our approach to managing modern slavery risks.

Importantly, we supplement our internal evaluations with external benchmarks and independent audit results. In 2024, we participated in a Human Rights-focused Workplace Conditions Assessment (WCA) conducted by Intertek, achieving an overall score of 100% across all audit categories, including Labour, Wages & Hours, and Management Systems. No non-compliances were identified, and best practices were recognised in multiple areas.

We also participated in customised client audits covering modern slavery, human rights, and related areas, with all outcomes meeting or exceeding expectations. These assessments provide external validation of our systems and reinforce our commitment to transparency and continuous improvement.

FUTURE PRIORITIES

The MSS Group will continue to build on our existing systems and initiatives to manage and mitigate modern slavery risks across our operations and supply chains. As our internal capabilities and governance structures mature, we are committed to further strengthening our practical and strategic responses to the evolving nature of modern slavery risks.

At a high level, we will continue to:

- periodically review our modern slavery framework, strategy, and action plan to ensure its effectiveness and alignment with our operational realities;

- review and enhance our policies, procedures, and controls as our understanding of risks improves;

- refine and improve our training to ensure it is engaging, accessible, and measurable in terms of effectiveness;

- collaborate with clients in their own efforts to combat modern slavery and support ethical sourcing; and
- raise awareness of modern slavery risks among employees, subcontractors and their employees, and other relevant suppliers.

More specifically, our focus in the year ahead includes the following:

Our Direct Operations

We intend to:

- undertake further internal analysis of the independent employee entitlements review (referred to earlier) to determine whether additional safeguards or changes should be adopted to strengthen our internal governance framework;
- continue to collaborate with our internal training personnel to refine and improve the structure and delivery of modern slavery training;
- seek further feedback from employees to determine the need for a broader awareness program that helps people at all levels better understand, recognise, and report modern slavery risks;
- continue reviewing and updating relevant policies to ensure they remain current and actionable in practice; and
- promote our Modern Slavery Policy and Whistleblower Policy and Procedure internally to ensure staff remain aware of their obligations and the channels available to raise concerns.

Our Supply Chain

Security Subcontractor Suppliers

We intend to:

- continue refining our strategy to reduce reliance on subcontractor labour where feasible, practical, and supported by our clients;
- prioritise the execution of our annual subcontractor audit program, with a focus on ensuring subcontractor compliance with modern slavery, workplace, and industrial relations obligations; and
- review subcontractor audit results year-on-year to monitor trends and identify emerging risks or areas of progress.

Other Suppliers

In relation to our broader supplier base, future activities are expected to include:

- continued engagement with suppliers in higher-risk categories to support shared action plans and promote more transparent reporting;
- deeper analysis of modern slavery questionnaire responses from selected suppliers to determine whether further investigation or remediation is required;
- ongoing assessment of whether and how to map risk exposure among non-direct (Tier 2 and Tier 3) suppliers; and
- review and potential enhancement of our procurement processes, including the possible introduction of formal procurement guidelines to support ethical sourcing and supplier engagement.

External Assessment and Transparency

In 2025, we have committed to undertake a Sedex SMETA audit, which will serve as a key step in reinforcing our commitment to transparency and third-party validation of our human rights and modern slavery risk management practices. We see this as a valuable opportunity to benchmark our systems and identify further areas for improvement in collaboration with industry and clients.

CONSULTATION

The MSS Group takes a collective approach to addressing the risks of modern slavery and compliance with modern slavery laws. Our operating entities undertake business in the security and related sectors, have many of the same suppliers, a common philosophy and share the same executive management team. Policies, procedures and processes of the MSS Group, including this statement, are developed collaboratively, and authorised by the directors of the respective entities.

APPROVAL

This statement was approved by the Board of SIS Australia Holdings Pty Ltd, ABN 65 132 211 459

Michael McKinnon

CEO