

## Contents

1. INTRODUCTION AND PURPOSE .....	2
<b>1.1 Introduction</b> .....	2
<b>1.2 Purpose</b> .....	2
2. SCOPE.....	2
3. BACKGROUND.....	3
<b>3.1 What is Modern Slavery</b> .....	3
<b>3.2 What are some signs or indicators of Modern Slavery?</b> .....	4
4. POLICY STATEMENT.....	5
5. RESPONSIBILITIES OF THOSE IN THE MSS SECURITY GROUP.....	5
<b>5.1 Directors</b> .....	5
<b>5.2 MSS Security Group</b> .....	6
<b>5.3 Modern Slavery Working Group</b> .....	6
<b>5.4 Personnel</b> .....	7
<b>5.5 Managers and Supervisors</b> .....	7
6. SUPPLIERS.....	7
7. TRAINING .....	8
8. RAISING AND DEALING WITH CONCERNS .....	8
<b>8.1 Raising Concerns</b> .....	8
<b>8.2 Dealing with Concerns</b> .....	8
9. CONSEQUENCES OF NON-COMPLIANCE .....	9
<b>9.1 Our Personnel</b> .....	9
<b>9.2 Suppliers</b> .....	9
10. RELATED POLICIES AND PROCEDURES .....	9
11. POLICY REVIEW .....	10
12. DEFINITIONS AND INTERPRETATION .....	10
13. DOCUMENT HISTORY .....	11
14. APPROVAL.....	11

## 1. INTRODUCTION AND PURPOSE

### 1.1 Introduction

**Modern Slavery** is a crime that deprives a person of their liberty for the commercial gain of another person in violation of their fundamental human rights. It is a global problem which impacts millions of people, occurs in most industries and can have devastating consequences on its victims.

The **MSS Security Group** recognises that businesses have an important responsibility to respect and promote human rights in their operations and supply chains and must play a key role if the quest to eradicate **Modern Slavery** is to be achieved. A significant part of this role includes taking pro-active steps to assess and address **Modern Slavery** risks.

### 1.2 Purpose

The purpose of this policy is to:

- a) act with a view to preventing **Modern Slavery** practices in our business and supply chains;
- b) where appropriate, take relevant action to remedy incidents of **Modern Slavery**, in our business and supply chains;
- a) demonstrate our commitment to working with our stakeholders to bring **Modern Slavery** to an end; and
- b) ensure compliance with the **Modern Slavery Laws**.

This policy underpins our annual **Modern Slavery Statement**.

## 2 SCOPE

This policy applies to:

- a) the **MSS Security Group** which includes MSS Security Pty Ltd (ABN 20 100 573 966), MSS Strategic Medical and Rescue Pty Ltd (ABN 48 155 387 152), Habitat Security Pty Ltd (ABN 48 610 045 189) and the related entities of these companies (also, referenced collectively as "we" "us "our);
- b) all our **Personnel**; and
- c) persons and entities that provide goods or services to us (our suppliers) and their **Personnel**.

We also expect that our customers and all persons and entities who have or are seeking a relationship with us, to be familiar with this policy and to act in a way that is consistent with the values contained within it and with **Modern Slavery Laws**.

### 3. BACKGROUND

#### 3.1 What is Modern Slavery

The term **Modern Slavery** is broadly used to describe situations where coercion, threats or deception are used to exploit people and undermine or deprive them of their liberty. It occurs in every country in the world including in Australia where it is estimated that at least 15,000 people are living in **Modern Slavery** conditions<sup>1</sup>.

Migrants, who enter Australia on limited or temporary visas and/or younger people, including students, may be at a heightened risk of being exploited and experiencing **Modern Slavery**. This is especially the case if they have fewer support networks, a lower English language proficiency or do not understand employment laws.

The following practises are all considered to be **Modern Slavery** and are serious crimes under **Modern Slavery Laws** in Australia:

- **debt bondage:** where a person is forced to provide services as security for repayment of a debt which is inflated/manifestly excessive; or their services are not applied against the debt; or there is no limit to the length and nature of the services;
- **deceptive recruiting for labour or services:** for example, where a recruiter charges a person a fee for a job offer then confiscates their identity documents and deceives them about their ability to leave the job;
- **trafficking in persons:** describes the recruitment, harbouring and movement of a person by coercion, threats or deception in order to exploit them;
- **slavery:** when a person exercises powers of ownership over another person, i.e. the person is treated like they are a commodity or object – able to be traded;
- **forced labour:** when a person is forced to work by coercion, threats or deception;
- **servitude:** when a person is not able to stop work or leave their place of work because of coercion, threats or deception and is deprived of their personal freedom in aspects of their life outside work, for example, they are told when they can eat or sleep;
- **forced marriage:** where coercion, threats or deception are used to make a person marry; and
- **child labour:** the worst forms - describes situations where children (under 18) are subjected to slavery or similar practices or engaged in hazardous work.

**IMPORTANT: Modern Slavery** does not include practices like substandard working conditions, excessive working hours, withholding or underpayment of wages or unfair employment

<sup>1</sup> Global Slavery Index 2018- see <https://www.globallslaveryindex.org/2018/findings/country-studies/australia/>

practises. However, these practices are also illegal and may be indicators or signs that Modern Slavery may be occurring.

### 3.2 What are some signs or indicators of Modern Slavery?

**Modern Slavery** can be complex and multi-faceted and also difficult to identify. In fact, in Australia, it is estimated that four out of five cases of **Modern Slavery** go undetected<sup>2</sup>

Some key signs that **Modern Slavery**<sup>3</sup> may be occurring, include:

- excessive working hours, withholding or underpayment of wages or unfair employment practises (as noted above);
- intimidation and threats including threats of deportation;
- debt bondage (see section 3.1 for an explanation of this);
- threatened or actual physical and/or sexual violence;
- physical appearance shows signs of abuse;
- lack of travel, identity or other important documents;
- controlled or restricted freedom of movement for example workers being picked;
- abusive living and/or working conditions;
- living at the workplace or another place owned/controlled by the employer;
- isolation – geographic, social and/or linguistic;
- deception or lack of information with respect to the nature and conditions of work;
- lack of discretion or choice over personal life decisions; and
- inability to end employment freely at any time.

Please note, the above indicators are examples and not exhaustive. Also, the existence of one or more of the indicators will not necessarily mean that **Modern Slavery** practices are taking place. The key is to stay alert and if you see signs that cause you concern, raise these via appropriate channels (See section 8 of this policy).

<sup>2</sup> According to Anti-Slavery Australia: See <https://antislavery.org.au/modern-slavery/>

<sup>3</sup> See <https://antislavery.org.au/modern-slavery/>

#### 4. POLICY STATEMENT

The **MSS Security Group** has a zero-tolerance approach to and rejects any form of **Modern Slavery**. We are committed to addressing **Modern Slavery** risks and implementing and enforcing reasonable and practical systems and controls to minimise the possibility of **Modern Slavery** taking place anywhere in our own business or our supply chains.

We aim to:

- act ethically and with integrity in all our business dealings and relationships;
- do what is necessary to comply with **Modern Slavery Laws**; and
- ensure there is transparency in our own business and in our approach to tackling **Modern Slavery** throughout our supply chains.

We expect the same standards from our **Personnel** and all people and organisations we engage with, including our suppliers, customers and other stakeholders.

We also follow all laws regarding employment practices.

If made aware of **Modern Slavery** practices in our own business or within our supply chain, we will endeavour to resolve the issue in line with the values expressed in this policy.

#### 5. RESPONSIBILITIES OF THOSE IN THE MSS SECURITY GROUP

##### 5.1 Directors

Our **Directors** have ultimate responsibility for doing what is reasonably necessary to ensure that the entities in the **MSS Security Group** and their **Personnel** comply with this policy and their obligations under **Modern Slavery Laws** and other applicable related laws.

To this end, the **Directors** will:

- establish and maintain a **Modern Slavery Working Group** who will have delegated primary and day to day responsibility for the management of **Modern Slavery** matters;
- review and approve of the annual **Modern Slavery Statement**;
- consider and approve relevant recommendations of the **Modern Slavery Working Group**;
- ensure appropriate resources are available to ensure the **MSS Security Group** is able to comply with its obligations under this policy, **Modern Slavery Laws** and other applicable related laws; and
- ensure the **MSS Security Group** complies with its responsibilities set out below.

## 5.2 MSS Security Group

The **MSS Security Group** (either through the **Modern Slavery Working Group** or other relevant **Personnel**) will:

- identify and address **Modern Slavery** risks in our business and supply chain including by the actions described in this policy and our **Modern Slavery Statement**;
- take steps to raise awareness of **Modern Slavery** risks including by:
  - having and promoting this policy; and
  - providing training on this policy and on **Modern Slavery** issues for our **Personnel** and the **Personnel** of key suppliers so that such **Personnel** can recognise **Modern Slavery** practices and take steps to help identify and address them; and
- develop and implement measures to periodically measure our performance and continue to build on our accomplishments.

## 5.3 Modern Slavery Working Group

The **Modern Slavery Working Group** has been delegated the primary and day to day responsibility for **Modern Slavery** matters for the **MSS Security Group**. Its responsibilities include:

- undertaking relevant due diligence;
- developing and driving the implementation of a strategy and action plan;
- making recommendations to the **Directors**;
- implementing recommendations approved by the **Directors**;
- preparing the annual **Modern Slavery Statement** for the **MSS Security Group**; and
- undertaking other responsibilities as instructed by the **Directors**

for the purposes of identifying and addressing **Modern Slavery** risks in our business and supply chains.

The **Modern Slavery Working Group** is also responsible for:

- monitoring and reporting on the effectiveness of this policy and our strategy and action plan; and
- dealing with queries in relation to our approach to identifying and addressing **Modern Slavery** risks in our business and supply chains and on **Modern Slavery** generally.

## 5.4 Personnel

All our **Personnel** are expected to:

- read, understand and comply with this policy and **Modern Slavery Laws**;
- take all reasonable steps to help ensure our business and supply chain is free of **Modern Slavery** practices;
- undertake required **Modern Slavery** training;
- lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us;
- remain alert to signs or indicators of **Modern Slavery**;
- raise any concerns about any issue or suspicion of **Modern Slavery** in any parts of our business or supply chains in accordance with section 8 of this policy; and
- report any actual or suspected cases of **Modern Slavery** or any actual or suspected breaches of this policy in accordance with section 8 of this policy.

## 5.5 Managers and Supervisors

Managers and supervisors are:

- responsible at all levels for ensuring that those reporting to them understand and comply with this policy and undertake relevant **Modern Slavery** training; and
- expected to refer any reports of actual or suspected cases of **Modern Slavery** or any actual or suspected breaches of this policy they receive from our **Personnel** in accordance with section 8 of this policy.

## 6. SUPPLIERS

We expect all new and existing suppliers of both goods and services, including our subcontractors, to:

- comply with the principles set out in this policy;
- operate in compliance with the **Modern Slavery Laws** and other applicable related laws;
- take practical steps to address any risks of **Modern Slavery** in their own businesses and supply chains;
- notify us of an occurrence of **Modern Slavery** in their supply chains and also notify relevant authorities where appropriate;

- report any actual or suspected cases of **Modern Slavery** or any actual or suspected breaches of this policy in accordance with section 8 of this policy; and
- comply with our **Supplier Code of Conduct**.

## 7. TRAINING

Training on this policy and on **Modern Slavery** will be made available and given to all our **Personnel**. This will include incorporating **Modern Slavery** information in our e learning induction training module which is undertaken upon the commencement of employment and periodically thereafter as a refresher.

Where relevant, **Modern Slavery** information will also be incorporated into training modules developed for our subcontractor suppliers and their **Personnel**.

## 8. RAISING AND DEALING WITH CONCERNS

### 8.1 Raising Concerns

We expect that our **Personnel**, our suppliers and their **Personnel** and anyone else involved with our business will report any actual or suspected cases of **Modern Slavery**, breaches of this policy or **Modern Slavery Laws**.

Concerns should reported or disclosed as soon as possible in accordance with the **MSS Security Group** Whistleblower Policy and Procedure. Amongst other things, this sets out ways a "disclosable matter" may be disclosed, including through on external third party, Emverio Workplace Complaints, which provides an independent whistleblower service to us.

Emverio Workplace Complaints can be contacted by:

- Phone: 1300 454 574 between 7.00 am and 8.00 pm (Australian Eastern Standard Time) Monday – Friday (excluding public holidays – reduced hours during holiday periods;
- Email: [complain@workplacecomplaints.com](mailto:complain@workplacecomplaints.com)
- In writing: PO Box 1110 Spring Hill QLD 4000; or
- Web: [www.workplacecomplaint.com](http://www.workplacecomplaint.com)

In addition to the ways set out in our Whistleblower Policy and Procedure, you may raise your concerns with the **Modern Slavery Working Group** by e mail to [mSWG@mssecurity.com.au](mailto:mSWG@mssecurity.com.au).

If, however, there is immediate danger, the matter should be reported without delay via Triple Zero, to the police.

### 8.2 Dealing with Concerns

Emverio Workplace Complaints will follow the procedures and set out in section 7.2 of our Whistleblower Policy and Procedure, including assessing the matter, investigating the matter,



and reporting on the matter. Reports of **Modern Slavery** related investigations will, however, be provided to the **Modern Slavery Working Group** who will review the report and make recommendations as to the relevant action to be taken.

Key to our approach and any action we take will be to ensure that appropriate support is provided to any victims, including that they are put in touch with appropriate support organisations and avenues.

## 9. CONSEQUENCES OF NON-COMPLIANCE

All incidents of non-compliance will be taken seriously and dealt with on a case-by-case basis.

### 9.1 Our Personnel

Breaches of, or incidents of non-compliance with, this policy, any **Modern Slavery Laws** or other applicable related laws by any of our **Personnel** may lead to disciplinary action. Serious breaches will be regarded as gross misconduct and may lead to immediate dismissal and to the matter being referred to relevant authorities for investigation.

### 9.2 Suppliers

If incidents of non-compliance are detected, our preference, in the first instance, is to engage and work with the relevant suppliers to:

- ensure the particular issue is eradicated and remediated;
- educate them and their Personnel and build their awareness of **Modern Slavery**; and
- help them implement steps to identify and address any risks of **Modern Slavery** in their own businesses and supply chains.

Any reluctance or refusal to cooperate may be regarded as a serious breach of this policy.

The consequences of any repeated or serious breaches of this policy, our **Supplier Code of Conduct**, any **Modern Slavery Laws** or other applicable laws, include termination of contracts, loss of future work and/or the matter being referred to relevant authorities for investigation.

## 10. RELATED POLICIES AND PROCEDURES

This policy should be read in conjunction with our following policies, procedures and protocols which are available on the MSS Security Group Intranet:

- Anti-Fraud and Corruption Policy
- Child Safe Environment Policy
- Corporate Social Responsibility Statement

- EEO, Discrimination, Harassment and Bullying Policy
- Employee Code of Ethics (set out in the Employee Standing Instructions)
- Fatigue Management Policy
- Grievances Policy (set out in the Employee Standing Instructions)
- Modern Slavery Statement<sup>4</sup>
- Recruitment Policy
- Whistleblower Policy and Procedure<sup>5</sup>
- Work Health and Safety Policy
- Supplier Code of Conduct.

## 11. POLICY REVIEW

We will endeavour to review and where relevant and necessary) update this policy once every two years to ensure it is operating effectively.

## 12. DEFINITIONS AND INTERPRETATION

In this policy unless the context otherwise requires:

**Directors** means directors of each of the entities in the **MSS Security Group**;

**Personnel** includes the employees, directors, officers, independent contractors, agents and representatives of an entity;

**Modern Slavery** is defined in section 3.1 of this policy;

**Modern Slavery Act** means the *Modern Slavery Act 2018* (Cth);

**Modern Slavery Laws** include the **Modern Slavery Act**, the *Modern Slavery Act 2018* (NSW) and any other applicable laws dealing with **Modern Slavery**;

**Modern Slavery Statement** is an annual report Australian entities with a consolidated annual revenue of over \$100 million are required to make under the **Modern Slavery Act**. (Entities who do not meet the thresholds for mandatory reporting may submit a voluntary statement). The statement is submitted to Australian Border Force and published on a publicly accessible online [register of modern slavery statements](#);

<sup>4</sup> Also available on the MSS Security website

<sup>5</sup> Also available on the MSS Security website

**Modern Slavery Working Group** is a group consisting of representatives from relevant areas of our business who (amongst other things) undertake due diligence, develop a constructive strategy and action plan in relation to identifying and addressing **Modern Slavery** risks in our business and supply chains;

**MSS Security Group** is defined in section 2 a) of this policy; and

**Supplier Code of Conduct** refers to the ethical standards and behaviours we expect from ourselves and our suppliers. The code has been an unwritten one but is expected to be formalised in writing and apply by April 2021.

**13. DOCUMENT HISTORY**

Date	Version	Author	Reason
January 2021	1.0	Penny Sena- General Counsel	Introduction of formal policy

**14. APPROVAL**

Date	Name	Position	Signature
January 2021	Geoff Alcock	Managing Director - MSS Security Pty Ltd	