

**millennium**

# MODERN SLAVERY STATEMENT

DECEMBER 2022



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## ACKNOWLEDGEMENT OF COUNTRY

Millennium acknowledges the Aboriginal and Torres Strait Islander peoples as the first inhabitants and Traditional Owners and Custodians of Country throughout Australia.  
We pay respects to Elders past, present and emerging.



*United: Our Reconciliation Journey. Lani Balzan, 2022*

Millennium has developed its first Reconciliation Action Plan (RAP). We elected to undertake the Innovate RAP, reflecting our readiness to implement reconciliation initiatives over a 2-year timeframe.

Millennium asked Aboriginal artist, Lani Balzan to help us express our Reconciliation journey and ambitions with a painting. Lani is a proud Aboriginal woman from the Wiradjuri people of the three-river tribe. Pictured above is the artwork.

**Our vision for reconciliation is to achieve greater unity with and equity and inclusion for Aboriginal and Torres Strait Islander peoples.**

# 1. HIGHLIGHTS OF THE YEAR

In 2021/22 Millennium continued to build trust and respect from our customers through exceptional service, delivered by a committed and dedicated team. This approach has translated into a solid business performance in an environment which remains challenging following the impact of the COVID-19 pandemic.

## Healthy business

Millennium's ongoing focus on continuous improvement and outstanding service delivery is a credit to the entire Millennium team. The business has proven resilient throughout the continued impact of COVID-19 and our broad ranging client and industry base has enabled us to withstand and capitalise on market changes in demand for services during this challenging period. It is especially pleasing that we have secured several large blue chip client contract renewals in the second half of the financial year, further strengthening our position in the market. In line with our growth strategy, we welcomed several new clients whilst renewing and expanding contracts both within the retail sector (which has traditionally accounted for most of our total revenue) as well as the commercial, transport, government and education sectors.

## Change in Group Leadership

In February 2022, Millennium's Chief Executive Officer resigned. For Royce Galea, company Founder and Executive Director, the transition to the role of Chief Executive Officer has been seamless. Royce brings extensive industry experience and relationships, and a relentless focus on customers and people engagement to the role.



## Codee Cleaning Partnership

In December 2021 Millennium entered a working partnership agreement with Codee Cleaning Services, based in Western Australia (WA). Codee is an Indigenous owned and operated cleaning business established in 2011, providing a diverse range of cleaning services across multiple sectors in WA. These arrangements provide opportunities for Codee to work in alliance with Millennium to further develop and grow its cleaning business, whilst also providing meaningful employment, education, and economic opportunities for Australia's First People.

Working with Codee, Millennium gains a unique opportunity to improve understanding and connection and build relationships with Aboriginal & Torres Strait Islander peoples.

## **Ethical Treatment of Workers**

We are very conscious of community and customer expectations for responsible business practices, and we are committed to maintaining high standards of compliance, safety, and customer service. Our Board led governance program ensures Millennium meets its legal, social, and ethical obligations.

Our commitment to ensuring ethical treatment of employees begins with correct payment of wages and application of Award and National Employment Standard terms and conditions but extends well beyond this to prioritising health and safety and aspects such as work life balance and job security.

***As a people business, our team members are the lifeblood of the Company, and their safety and wellbeing are our priority.***

## **Impact of COVID-19**

Throughout the pandemic and whilst travel and trade restrictions were being eased, Millennium maintained strong relationships with our Supply Chain stakeholders. This ensured good continuity of service and reduced any potential risks of engaging new suppliers to source materials or services from a Tier 1 or 2 supplier who may have poor business practices, including Modern Slavery.

The easing of restrictions across the nation in 2022 saw most of our customers returning to pre-pandemic operational capacity. However, limited immigration and labour shortages across both the cleaning and security industries presented challenges for the labour demands of our customers and has placed strains on the existing workforce in some areas.

To assist with the recovery, Millennium had proactively engaged in recruitment drives whilst adhering to fair and transparent practices along with the inclusion of referrals incentives. Existing workforces were engaged to additional hours in line with applicable Modern Awards, National Employment Standards and Safe Work Australia's Fatigue Management guidelines.

The easing of mandatory isolation requirement following a positive test for COVID-19, along with the rollback of government financial support to affected individuals, resulted in a spike in personal leave uptake during Q2 of 2022 which stabilized over time. Similarly, our supply chain partners have been challenged with labour shortages throughout this reporting period.

The safety of our staff, clients and customers has been, and will always continue to be, paramount in everything we do. COVID-safe processes and protocols were implemented and developed in this rapidly changing environment and a full review of the COVID Safe Plan was completed in line with the easing of mandatory vaccination requirements. Upon review and consultation, Millennium eased its mandatory vaccination requirement but continues to strongly encourage COVID vaccination in line with health directives. Vaccination requirements are now only applicable for specified high-risk work locations or where a customer mandate exists.

## **Modern Slavery Risk Commitment**

We are committed to being fair and inclusive in the way we operate across our business. We make the safety and well-being of our people our top priority. We do this because it is the right thing to do and because our team members are the foundation of our business.

Millennium has adopted the Australian Modern Slavery Act definition of Modern Slavery, including the eight types of exploitation. Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Millennium is committed to identifying and addressing risks and any potential instances of Modern Slavery in our operations and supply chains. This statement is the Group's third Modern Slavery Statement which has been lodged with the Australian Border Force for the year ending 2022.

Millennium has reinforced its prevention of Modern Slavery commitment through its continued association with the Property Council's informed 365 tech platform to engage suppliers around Modern Slavery risks. During the 2022 calendar year, no specific examples of Modern Slavery were identified in our operations or supply chains.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to prevent modern slavery within our own business and our supply chains. Millennium also understands the key to eradicating this complex issue is to set clear expectations for our people and suppliers, educate and train them on the impacts of Modern Slavery and its prevention and ultimately alert us to potential involvement in modern slavery and empower us to take steps to address it and to prevent such involvement in the future.



A handwritten signature in black ink, appearing to read 'Royce Galea'.

**Royce Galea**  
Chief Executive Officer and Managing Director



A handwritten signature in black ink, appearing to read 'Stuart Grimshaw'.

**Stuart Grimshaw**  
Chairman and Non-Executive Director

## 2. ABOUT THIS STATEMENT

Mandatory Criteria for Modern Slavery Statements		Pages
<b>Criterion 1</b>	Identify the Millennium Services Group reporting entities	7
<b>Criterion 2</b>	Describing Millennium Services Groups' structure, operations, and supply chains	8-14
<b>Criterion 3</b>	Describing the risks of modern slavery practices in the Millennium operations and supply chains	16-22
<b>Criterion 4</b>	Describing the actions taken by Millennium Services Group to assess, address these risks, including due diligence & remediation processes	17 - 26
<b>Criterion 5</b>	Describing how Millennium Services Group assesses the effectiveness of these actions	27
<b>Criterion 6</b>	Describing the process of consultation within Millennium Services Group and its entities any entities making the statement	7
<b>Criterion 7</b>	Information in relation to Covid-19	5

**This Modern Slavery Statement (Statement) is published for the purpose of reporting under 'section 14' of the Modern Slavery Act (MSA or the Act).**

This Statement is made on behalf of the Millennium Services Group Ltd, ABN: 11 607 926 787 for the financial year ended 30 June 2022.

This statement has been prepared on a consolidated basis for Millennium, together with its wholly owned subsidiaries.

- Millennium Management Services (Aust) Pty Ltd (ABN: 90 620 317 151)
- Millennium Management Services (WA) Pty Ltd (ABN: 17 088 255 412)
- Millennium Cleaning (Qld) Pty Ltd (ABN: 47 145 748 590)
- Millennium Cleaning (Tas) Pty Ltd (ABN: 94 620 939 399)
- Millennium Cleaning (NSW) Pty Ltd (ABN: 84 620 963 153)
- Millennium Cleaning (WA) Unit Trust (ABN: 56 441 862 723)
- Millennium Cleaning (Vic) Pty Ltd (ABN: 54 145 748 616)
- Millennium Security Specialist Services Pty Ltd (ABN: 26 620 314 892)
- Millennium Hi-Tech (SA) Pty Ltd (ABN: 37 146 13 9 764)
- Millennium Hi-Tech Group Pty Ltd (ABN: 94 103 423 374)
- Millennium Hi-Tech Holdings Pty Ltd (ABN: 60 145 989 224)
- Millennium Group (NZ) Ltd (NZBN: 94 290 417 564 85)

Millennium has consulted a wide range of internal and external stakeholders including executive leadership Team members, senior managers, suppliers, and the Property Council of Australia in preparing this Statement. Millennium provided the People & Risk Committee and Members of the Board with a draft of this Statement prior to its publication. The Officers and Directors of the above listed entities were thoroughly consulted in the preparation of this Statement.

This Statement and its disclosures only apply to co-ownership arrangements or co-venture investments in which a Millennium Services Group entity has operational control, either under the relevant co-ownership agreement or other governing document.

This Statement does not cover Codee Cleaning Services Pty Ltd, ABN: 24 128 058 006 although where possible we have set our expectations for alignment with our core standards, which include ongoing respect for human rights.

Millennium Services Group has not consulted with the owners and management team of Codee Cleaning for the purpose of this Statement and does not make any representations about the supply chains, operations, or governance of this entity.

### 3. MILLENNIUM STRUCTURE, OPERATIONS AND SUPPLY CHAIN

#### Purpose

We are a trusted partner to businesses across Australia and New Zealand providing cleaning, security and integrated property services, making places and spaces better for people.

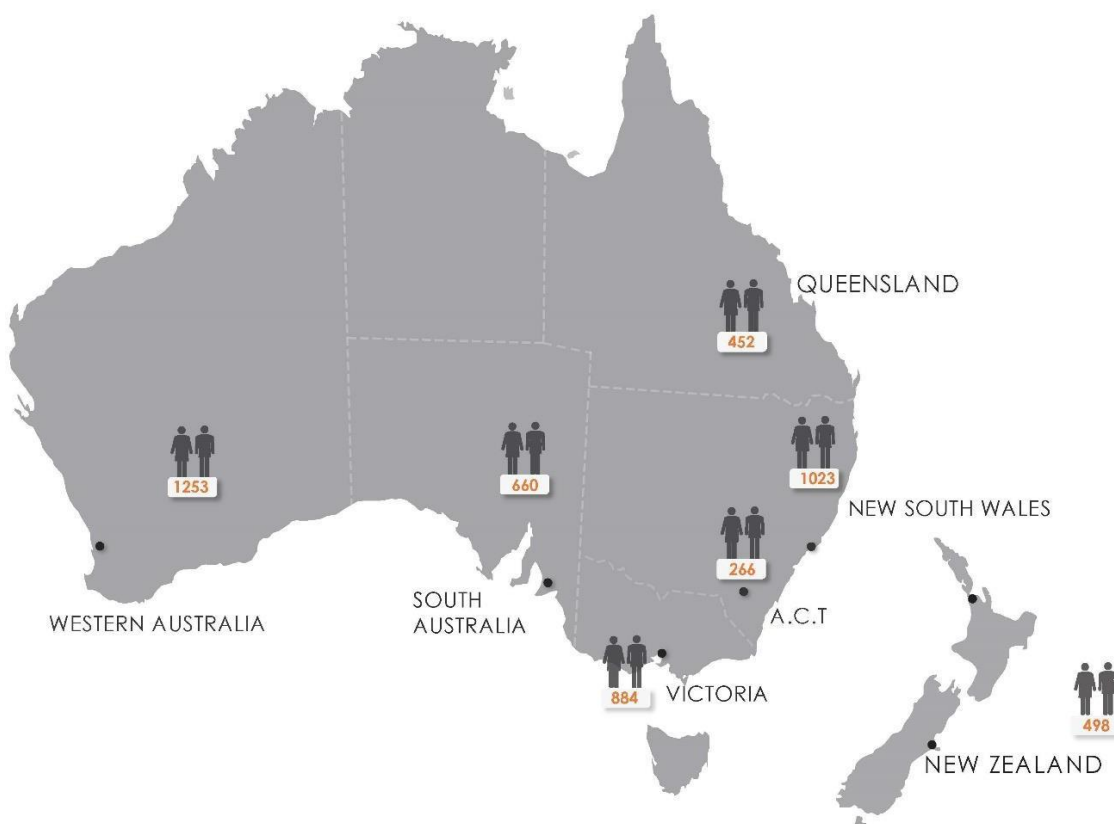
#### Values

Service	Teamwork	Accountability	Integrity
We care about the needs and expectations of our clients and the community, and our people are driven to provide outstanding service	We understand that working together, united as a team we are stronger, and the safety and wellbeing of our people is our top priority.	We take ownership for delivering results for our clients.	We act ethically, maintain strong corporate governance and are transparent and respectful to all our stakeholders.

With a team of more than 4,400, we serve clients across many sectors including:

▶ Retail    ▶ Commercial    ▶ Government    ▶ Hospitality    ▶ Industrial    ▶ Education

#### MILLENNIUM AUSTRALIA & NEW ZEALAND



## Services

### Cleaning

- Shopping & Retail assets
- Food Courts
- Rest Rooms & Car Parks
- Commercial Buildings & Offices
- Schools & Universities
- Entertainment Precincts
- Transport Hubs
- Specialist & COVID-19 cleaning
- Government office cleaning



### Security

- Building security services
- Access control
- Mobile Patrols
- Asset Surveillance
- Control Room Monitoring
- Loss Prevention
- Crowd Control
- Event Security
- National Operations Centre



### Integrated Property Services

- Concierge
- Maintenance
- Hygiene Services
- Waste Management
- Facility Support



## Business Sustainability

Our business sustainability approach focuses on three key areas: economic growth; our people; and fulfilling our broader responsibilities to society with a focus on community and environment.

### Economic Growth

- Operating profitability is the foundation for continuing to provide services to clients and the community and employing more than 4,400 people.
- Board led governance program ensuring the business meets its legal, social and ethical obligations
- Supplier Code of Conduct ensures sustainable procurement standards in relation to anti-corruption, labour management, the Modern Slavery Act and environmental impact
- Building trust and respect of customers through exceptional customer service
- Key strategies for profitability include; service excellence, cost management, pricing, assessing and managing individual contract profitability, leveraging technology for business improvement and pursuing business expansion.



### Our People

- Prioritising safety and wellbeing of our team
- Focus on mental health and wellbeing
- Fair pay and commitment to ethical treatment
- Supporting Diversity and Inclusion
- Zero tolerance to bullying and all forms of harassment and discrimination

## Community & Environment

### Community

- Partnering with clients, social enterprises and suppliers to help with community needs
  - Providing local job opportunities
  - Reconciliation Action Plan 2022-2024
  - Membership of Australian Network on Disability
  - Donations to charitable organisations such as Challenge Cancer, Mirabel Foundation, St John's Ambulance (NZ)

### Environment

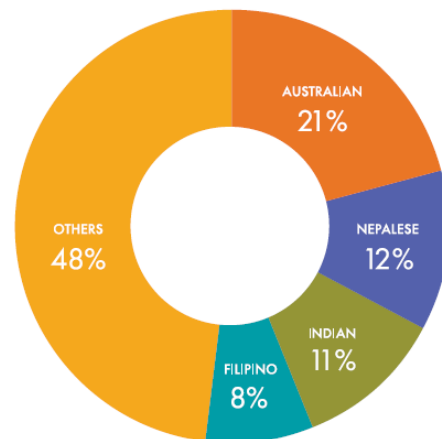
- Minimising our environmental footprint
- Complying with laws and regulations and maintaining Environmental Management System accreditation
- Partnering with clients and suppliers to develop innovative and improved practices
- Diversion of waste to landfill
- Reducing use of harmful chemicals

## People

Our people are our biggest investment and our most important asset. It is through our people that we differentiate the service we deliver to our customers; they are the frontline and foundation of our business.

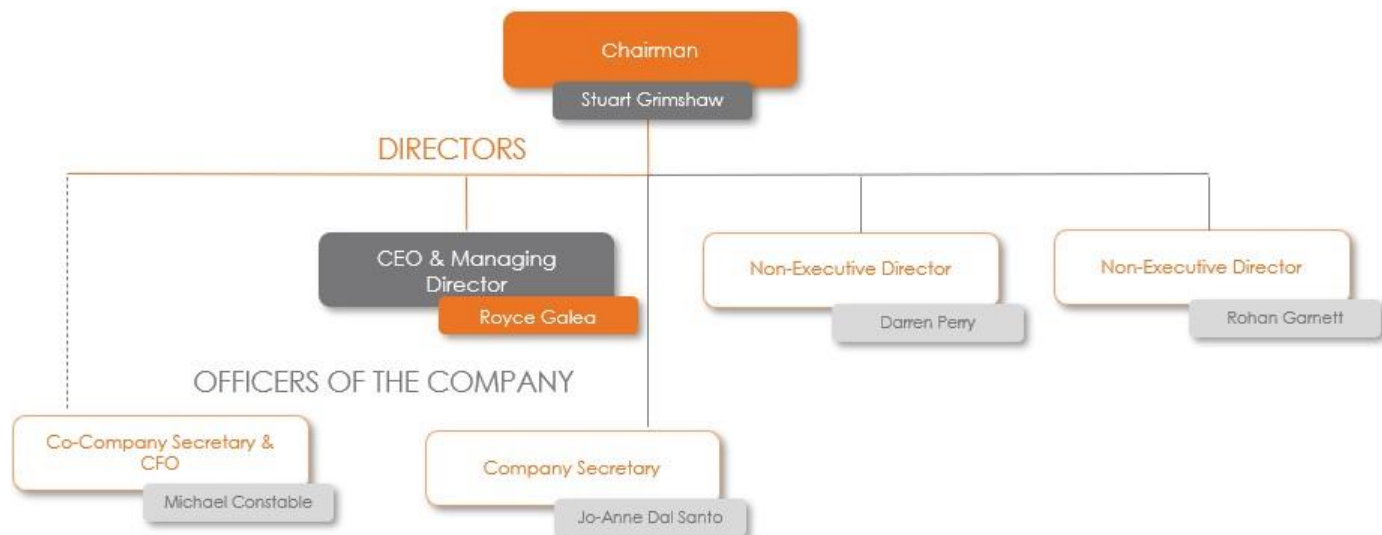
Our employees come from all walks of life and proudly represent more than 40 different nationalities. Our goal is to create a culture that is diverse, inclusive and that respects and celebrates our differences.

**Ethnic Diversity** (% of team members)

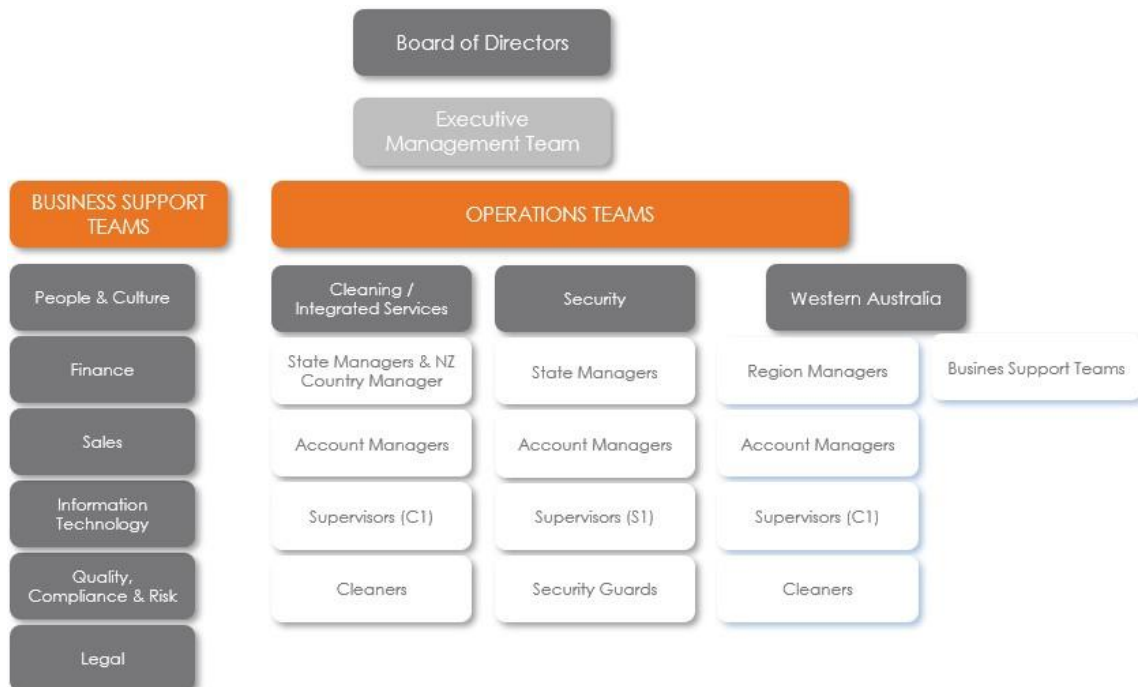


## Structures

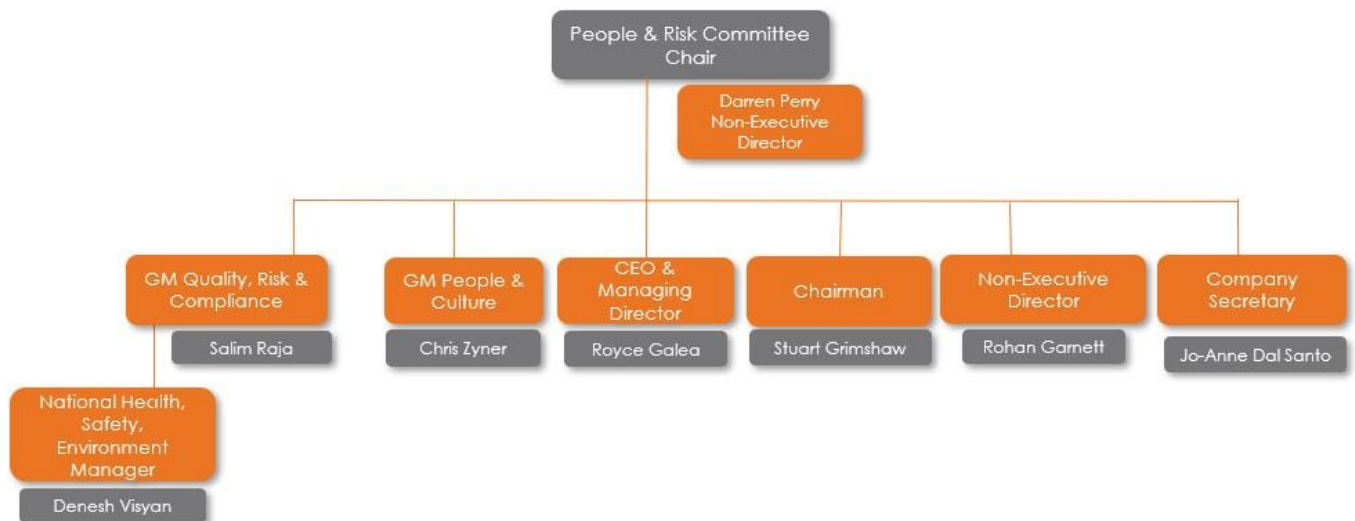
### Millennium Board Structure



### Millennium Organisational Structure



## People & Risk Committee Structure



## Safety Performance



## Financial Performance



## International Standards Certifications



## Supply Chain

### Supplier Category

<b>Goods or Consumables</b>	Cleaning products, Capital equipment, Clothing, Safety Consumables etc.
<b>Labour Hire Services</b>	Licensed Security Services for major events
<b>Services</b>	Information Technology, Corporate Services, Onsite Specialist Cleaning services

### Procurement Category

<b>Cleaning products</b>	Commercial cleaning consumables and supplies
<b>Information Technology</b>	Hardware, software, cloud services, IT consultancy services
<b>Corporate Services</b>	Consultancy, insurance, accounting, property lease & audit services
<b>Security Services</b>	Licensed security services for major events
<b>Capital equipment</b>	Vehicles, commercial cleaning equipment
<b>Clothing</b>	Staff uniforms, footwear
<b>Safety Consumables</b>	General and Specialist PPE, First Aid & Spill kits

## 4. MODERN SLAVERY RISK

### 4.1 Risk Management Approach

#### Modern Slavery Framework

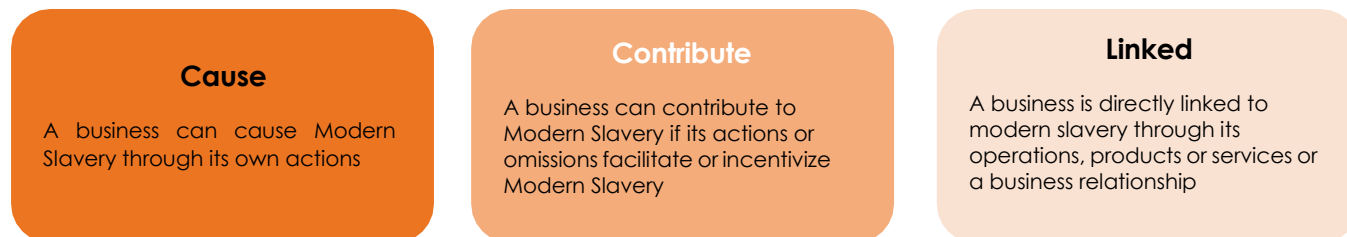


**\*Note:**

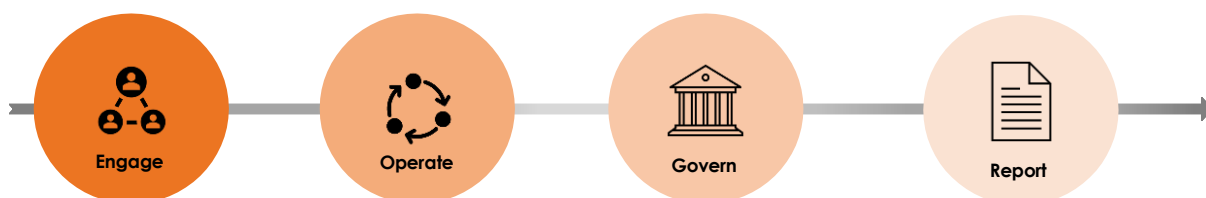
BSCAA – Building Services Contractors Association of Australia  
SCCA – Shopping Centre Council of Australia

## 4.2 Identifying Modern Slavery Risk

According to the United Nations Guiding Principles (UNGP) on Modern Slavery, an organisation can have Human Rights impact through the following:

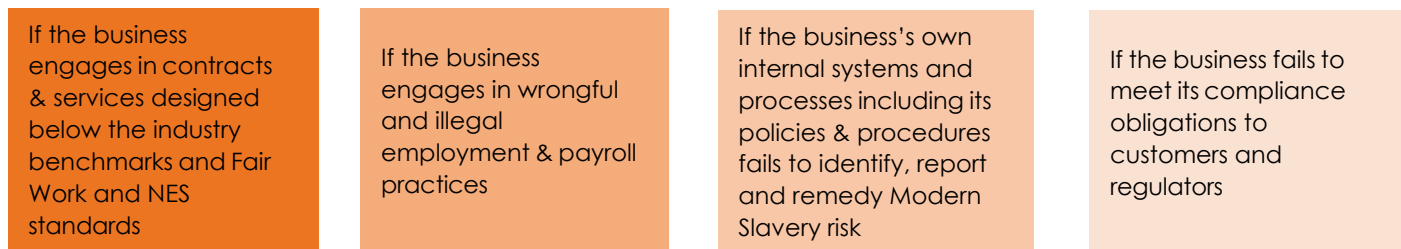


The Australian Government encourages entities to draw on the UNGP continuum to understand and communicate modern slavery risks. Using this continuum, we considered the scenarios where our activities may result in human rights-related harm or impacts through modern slavery. In line with the Risk Identification methodology noted above, Millennium could "Cause," "Contribute" and be "Linked" to modern slavery. These risks are mitigated and monitored given the controls and governance structures in place at Millennium.

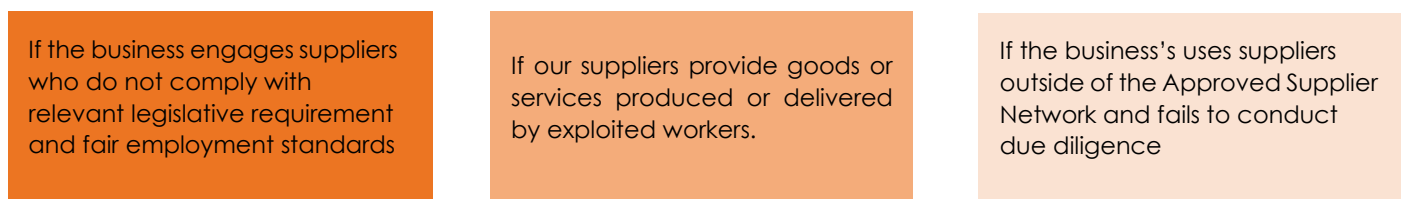


### Risk Scenarios

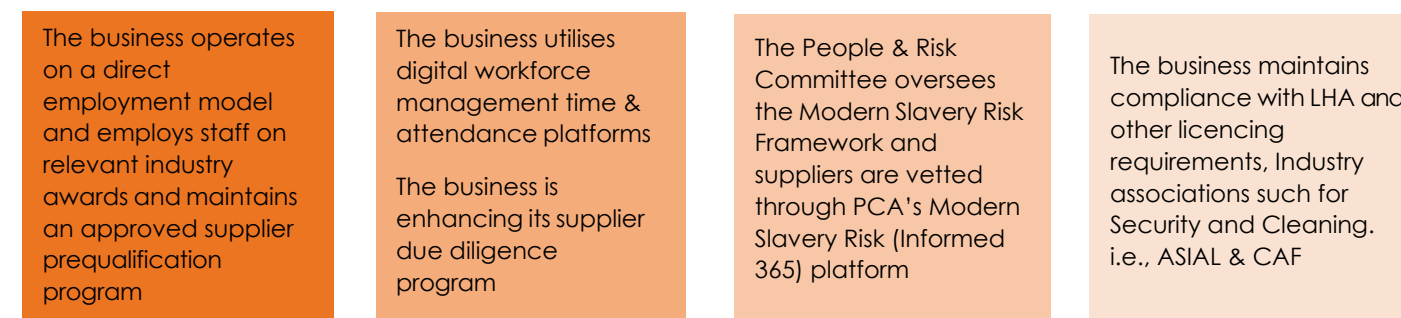
#### Caused due to the Business Operations



#### Contributed or Linked through the Business Supply Chain



#### How Millennium Services Group addresses these Risk



## 4.3 Assessing the risk of Modern Slavery

Property Council of Australia - Millennium Services Group Assessment Outcome

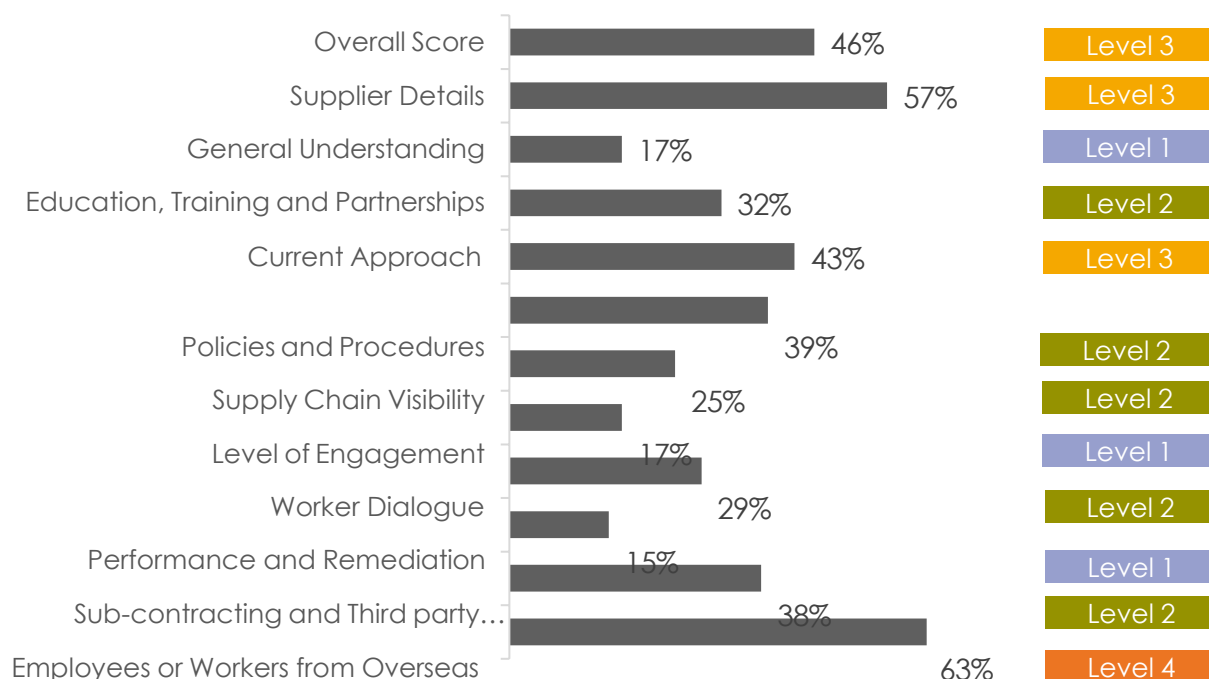
Initial analysis sourced from the Property Council of Australia Platform (Informed 365) is a key resource for analysing risk. Millennium Services Group completes an annual self-assessment and has been since 2019 when Millennium first joined the platform.

According to the self-assessment form completed for 2022 – 2023, Millennium Services Group has been assessed at 46% as a **Level 3 – Medium Risk** for Modern Slavery.

Risk Level	Percentage	Classification
Level 1	0-20%	Very Low
Level 2	21-40%	Low
Level 3	41-60%	Medium
Level 4	61-80%	High
Level 5	80-100%	Very High

The Modern Slavery risk self-assessment is based on 11 individual criteria including, but not limited to, supplier details and engagement practices to governance education & training and process for mitigating and remedying modern slavery risk when identified.

### Modern Slavery Risk Self-Assessment



Based on the self-assessment result, the highest level of Modern Slavery risk identified within Millennium operations is due to the employment of temporary migrant workers as a Level 4 – High Risk which forms part of the Millenniums Part Time or Casual workforce.

Millennium recognises that the Cleaning and Security service industries remain susceptible to Modern Slavery risks due to the nature of the industries themselves and as a result, the inherent risk of Modern Slavery risk is assessed as a Level 3 – Medium Risk.

Millennium's governance practices and controls in relation to Modern Slavery risk is accomplished through the overall management of the Modern Slavery Risk Framework overseen by Millennium's Board of Directors, People & Risk Committee and Executive & Senior Management members. The MS Framework is well developed and mature and a reflection of these assessed criteria identifies that Education and Training, Policies & Procedures and Supplier Engagement in relation to MS risk are maintained at Level 1 & 2 – Very Low & Low levels.

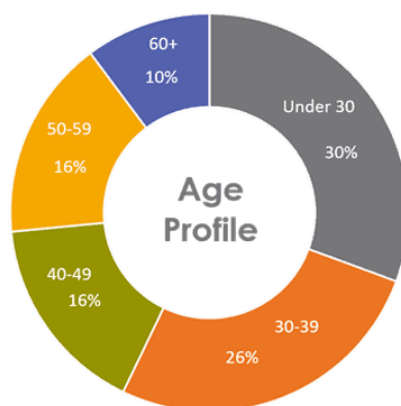
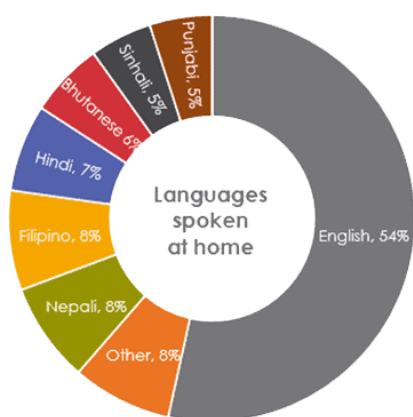


## Operational Risk

Much of our team is on the frontline of our business. They comprise of cleaners, security officers, customer service consultants, and maintenance workers. Supporting these frontline teams are our Account Managers and Site Managers who represent the Operations Teams. These Operational Teams are supported by our administrative support staff and professionals in functions such as Finance, IT, Risk, Human Resources, and our Executive Leadership Team.

Our gender mix is approximately 47% female and 53% male, while the Age Profile chart below shows our team combines youth and experienced staff with 30% of our workforce under 30 and another 10% aged over 60.

Our people come from all walks of life and proudly represent more than 40 different nationalities. For many new immigrants to Australia, Millennium is their first job in Australia.



## Risks and Controls

Millennium Operational Risk	Millennium Strategic Controls
<p><b>Diversity introduces potential linguistic and cultural barriers and increases the risk of our workers being vulnerable to risk of Modern Slavery</b></p> <p><b>Our operations are spread across Australia and NZ and vary significantly in scale and environment. This geographic spread introduces both operational management and oversight challenges</b></p>	<ul style="list-style-type: none"> <li>• Millennium operates under a direct employment model and complies with all relevant Industry Award employment terms</li> <li>• Millennium recruitment and employment policies, processes and procedures are all designed to ensure that legislative requirements are met</li> <li>• Millennium holds Labour Hire Licenses in Queensland and Victoria - these provide reassurance that Millennium is a 'fit and proper' employer compliant with workplace laws</li> <li>• Our Code of Conduct, CSR and Whistle Blower Policies provide clear behavioral expectations at all levels and empower our employees to play an active role in the elimination of improper conduct in the workplace.</li> <li>• Millennium uses digital Workforce Management Software to manage rostering and attendance – this provides secure high compliance data to our payroll system</li> </ul>

## Supply Chain Risk

A full overhaul and review of the Approved Supplier Program is currently underway. Millennium will be centralising the function of its Approved Supplier Program for all entities operating across Australia to ensure all suppliers providing Goods or Consumables, Labour Hire or Onsite and Offsite Services are thoroughly vetted and understand their Modern Slavery obligations as well as complying with the standards set out by Millennium Services Group and its operating entities.

Through this review, 525 suppliers were identified as providing some form of Goods or Consumables, Labour hire or Services to Millennium during this reporting period. Of these suppliers, 156 suppliers are considered "active", meeting all of Millenniums approved supplier prequalification requirements, with an additional 229 suppliers on "hold" for failing to meet the requirements. The Compliance team are working through the list of identified suppliers to ensure they comply with the requirements or are removed from the approved supplier program. An additional 136 suppliers have also been identified as "inactive" who haven't been engaged by Millennium during the reporting period.

Further analysis of Millenniums list of approved suppliers by value spend identified that nearly 50% of the spend is constituted by 5 suppliers - made up of a combination of Labour Hire Providers and suppliers providing Goods or Consumables. The suppliers are broken down by spend below. The table accounts for 99% of the supplier spend and the remaining 1% is made up of suppliers with a spend of less than \$1000 per financial year.

Supplier Type	No of Suppliers	% of Supply Spend
<b>Category A</b> Very High Value Procurement - \$500,000 and above	11	57.00%
<b>Category B</b> High Value Procurement - \$250,000 - \$499,999	21	14.00%
<b>Category C</b> Medium Value Procurement - \$50,000 to \$249,999	88	20.00%
<b>Category D</b> Low Value Procurement - \$10,000 - \$49,999	136	6.00%
<b>Category E</b> Very Low Value Procurement - \$1,000 - \$9,999	11	2.00%

In addition to the analysis by supplier spend, Millennium has also enrolled approximately 167 of its suppliers onto the Property Council of Australia – Informed 365 platform and have asked for Modern Slavery Risk Assessments to be completed and at the end of 2021, Bureau Veritas in tandem with PCA and other enrolled members conducted an assessment of their nominated suppliers which were identified by the member organisation as High Risk and an assessment summary and outcome based on the categories is as outlined below.

PCA Modern Slavery Risk Criteria	Risk Rating
Suppliers understanding and acceptance of Millenniums Supplier Code of Conduct and general understanding of modern slavery risk and reported breaches or penalties	Low
Current approach to modern slavery risk and reporting obligations including education and training of employees on modern slavery risk	High
Level of visibility of the supplier supply chain and engagement with their suppliers in relation to modern slavery risk	High
Ability of workers within the supply chain to raise modern slavery risk and the evaluation of performance and remediation for identified modern slavery risk	High
Compliance with Labour Laws and associated risks and risks associated with migrant workers	Low
Suppliers' own policies and procedures to tackle Modern Slavery Risk	High

The insights gained from the data received to date on the Property Council of Australia Informed 365 platform have further allowed Millennium to review our suppliers against the following key risk aspects.

- Geography of Suppliers
- Industry / Service Type
- Awareness of Modern Slavery risks
- Workforce Hiring Practices of Suppliers

Geography of Suppliers	
Risk Criteria	Risk Rating
<b>Tier 1 Suppliers</b> – 100% of suppliers are based in low-risk countries	Low
<b>Tier 2 Suppliers</b> – Approximately 50% of the supply chain includes Tier 2 and Tier 3 Suppliers	Medium
<b>Action &amp; Control</b>	
As part of our continuous improvement program, Millennium undertook a procurement consolidation project in FY22 resulting in a National Supplier deal with Bunzl which provided a significant opportunity to simplify our Tier 1 supply base and reduce risks of Modern Slavery.	

Industry / Service Type	
Risk Criteria	Risk Rating
<b>Labor Hire / Onsite Service Providers</b> - All are based and located in Australia or New Zealand and are predominantly used for events management or roster gap coverage. The modern slavery risks associated with these activities are recognised to be increased given third-party involvement	Medium
<b>Apparel Uniform Supplier</b> - The apparel industry is ranked # 3 by the Global Slavery Index and while Millennium's Tier 1 supplier is based in Australia, further verification and validation of the Tier 2 supplier is required	High
<b>Action &amp; Control</b>	
Millennium engage the services of registered providers who comply with company and individual state licensing requirements. Millennium is investigating introducing a robust due diligence program to assess ongoing compliance of these providers.	

Modern Slavery Awareness	
Risk Criteria	Risk Rating
Approximately 40% of the approved suppliers have yet to commit to assessing their own Supply Chain Modern Slavery risks	Medium
<b>Action &amp; Control</b>	
Communication and training from Millennium and Informed365 will continue, to drive this number lower and improve quality and depth of risk assessment throughout our supply chain	

Workforce Hiring Practices	
Risk Criteria	Risk Rating
Approximately 50% of the suppliers' subcontractors or third-party organisations to source workers increasing Modern Slavery risks by reducing visibility of the recruitment processes. These risks include the potential for debt bondage or wage theft	High
<b>Action &amp; Control</b>	
Further training and investigation are required into nature, level and location of these employment arrangements with affected suppliers. This may require detailed 3 <sup>rd</sup> party ethical sourcing reviews before risk level can be further reassessed.	

## 4.4 Addressing Modern Slavery risk across our business

Millennium Services Group conducts business in a way that respects the rights and dignity of employees and suppliers and avoids complicity in human rights abuses, while complying with legal and regulatory requirements which incorporate the protection of human rights. This is achieved through a strong commitment to prevention of Modern Slavery Risk by adopting a Governance Framework of policies & procedures and programs as outlined below.

### Millennium Modern Slavery Governance Framework

Millennium has a list of policies and procedures that consider the Human Rights of employees and suppliers which are adopted by its Board and followed by all working groups providing products or services to Millennium.

#### Modern Slavery Policy

Millennium acknowledges our ethical and legal obligations to our employees, stakeholders, clients, and suppliers. This policy reflects our commitment to act transparently, respectfully and with integrity within all our business relationships.

#### Whistle-Blower Policy & Program

Millennium Services Group has a Whistle-blower program that empowers our employees to play an active role in the elimination of improper conduct in the workplace. This program is provided by STOP line, a confidential, independent provider of whistleblowing services who will take full details of employee or stakeholder concerns via telephone, mail, email, fax, or the website. Our program enables individuals to maintain anonymity should they wish.

#### Human Trafficking and Anti-Slavery Policy

Millennium is committed to providing a safe and healthy workplace for our employees, contractors, visitors, and all other persons whose health, safety or wellbeing could be at risk through our work. To support our commitment, Millennium does not practice, tolerate, or support slavery or human trafficking within Millennium's business nor its supply chain.

#### Corporate Social Responsibility

Our socially responsible approach begins with being responsible for being a profitable and economically sustainable business. This means we can continue to provide our services for clients and community and provide jobs for our employees. We are serious about our responsibility to abide by the laws and regulations for our industry and to be ethical, just and fair in how we operate and fulfilling our broader responsibilities with a focus on community and environment.



### Employee Code of Conduct

The Millennium Services Group is a professional organisation and acknowledges its ethical obligations to employees, stakeholders, business partners, industry and the general public. Millennium Services Group is committed to treat everyone equally, and with respect and dignity. We take accountability for what is right and wrong, and freely accept and encourage the contribution of others.

### Supplier Code of Conduct

We seek to conduct business in a safe, accountable, and ethical manner that is in compliance with all applicable laws, regulations, and standards, including the Modern Slavery Act (2018) and is in alignment with the Ten Principles of the United Nations Global Compact of human rights, labour, environment, and anti-corruption. This Supplier Code of Conduct outlines our expectations of our suppliers and reflects our pledge to act transparently, respectfully and with integrity within all our business relationships. Compliance with this Code is a requirement for conducting business with Millennium

### ENTO – Workforce Management Platform

In 2019/20, Millennium introduced a digital workforce management platform which provides factual real time reporting with transparency to cultivate clarity and alignment in rostering and hours worked on the front line. The digital platform supports in the following areas.



Rostering



Time & Attendance



Award Interpretation



Real time Reporting

## Regulatory Compliance

### Labour Hire Licences

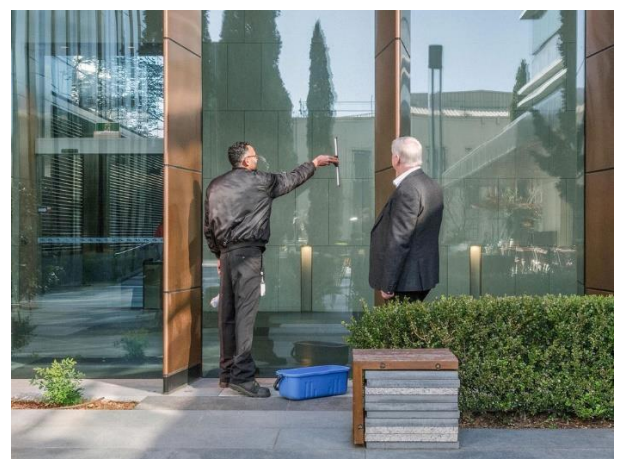
Millennium holds Labour Hire Licences in Queensland and Victoria. These provide reassurance that Millennium is a 'fit and proper' employer compliant with workplace laws. These licencing programs also ensure that any 3rd party labour sourced in those states is also sourced from licenced providers. The practices that allow Millennium to hold licences in these 2 states are also applied across all other Australia and New Zealand operations.



### Secure Local Jobs ACT

Millennium has been a registered and certified entity of the Secure Local Jobs Code program for delivering cleaning services since the program's inception in 2019. The code sets out workplace standards for the service providers which are aligned to Millenniums fair practices and Ethical Treatment of Workers. The condition set out for compliance by the code include:

- Pay and employment conditions
- Insurance, tax and superannuation
- Health and safety including induction & training
- Collective bargaining and freedom of association and representation rights



## Industry Specific

### ▴ Cleaning Accountability Framework – Cleaning

Millennium is a long-term supporter of the Cleaning Accountability Framework (CAF) and has achieved certification to the CAF 3 Star Standard for two of our long-standing client properties. A CAF Star rating on a building provides assurance to investors, building owners and their tenants that cleaning services at that building are being procured, managed, and delivered in a manner that foregrounds respect for cleaners' labour rights. Millennium has also commenced, and is currently in the second stage of the prequalification process, for organisation wide prequalification.



### ▴ ASIAL Compliance - Security

Millennium has maintained an Approved Security Industry Association (ASIA) in Queensland through the Australian Security Industry Association Limited (ASIAL) which assesses its compliance in accordance with the ASIAL code at least once every 3 years. The industry association engages the services of a chartered accounting firm (Assura Group Pty Ltd) to conduct compliance audits of its members and Millennium has maintained ongoing compliance with the Code. The code of conduct adopted by ASIAL is designed to require security firms to conduct their business activities in a manner which:

- Promotes consumer and community confidence
- Promotes the safety of the community and its employees
- Promotes ethical and professional conduct
- Promotes compliance with applicable state and federal legislation



Third Party & Client Specific

**Property Council of Australia: Informed 365**  
Millennium Services Group became a member of the Property Council of Australia Informed 365 platform which aids in assessing an organisation understanding, competency and controls to prevent and mitigate Modern Slavery Risk within its operations and Supply Chain.

Millennium invited a group of its most vulnerable suppliers to complete the Modern Slavery Assessment through this platform and a breakdown of the 167 suppliers Assessment completions can be seen in the adjacent table.

Supplies Completed	125
Suppliers In progress	25
Suppliers not commenced	17

Other Industry accreditations and memberships



## 4.5 Tracking and Communicating

Millennium is committed to continually refining our modern slavery risk management, including by taking steps to assess the effectiveness of our actions.

The Modern Slavery Risk Review through our People & Risk Committee (PRC) is our continual risk assessment process to evaluate both existing and emerging modern slavery risks. This process supports us in assessing the effectiveness of our actions to manage modern slavery risks by providing a mechanism to test whether our current response is fit for purpose.

The Review is facilitated regularly by the General Manager, Risk and Compliance, or a member of the People & Risk committee. Risk assessments are currently undertaken with key internal stakeholders for cleaning and security who are directly involved in managing operations including recruitment and training and their supply chains.

We recognise that understanding modern slavery risks built on supplier assessment alone is not a complete strategy. Our approach is to focus on supplier's workers and our internal workforce through the following avenues:

Widening reach to more workers	Building on partnerships
Worker engagement	Welfare Champions
Stakeholder collaboration	Property Council of Australia resource sharing

### Upcoming Actions

Our existing controls are reassessed and reinforced through the PRC Review. New controls may be developed as we gain more insights into their effectiveness. We have identified new initiatives to enhance both our existing controls as well as our ability to assess their effectiveness, including the following approaches to facilitate more reliable assessment of modern slavery risks in our supply chains:

- Annual supplier review of Very High and High Value procurement, checking suppliers' conduct and adherence to the Millennium Supplier Code of Conduct
- Roll out the Modern Slavery training developed by Millennium to familiarise and provide Millennium management with a better understanding of the Modern Slavery Risk and its controls
- Subsequent surveys of the management team to check the effectiveness of modern slavery training and its understanding
- Review of customer contractual requirements where Modern Slavery risk may exist
- Develop key performance indicators for preventive controls

While we endeavour to be as vigilant and thorough as possible, we recognise that modern slavery risks can be hidden and may only be discovered through reported incidents. Should this occur, our framework for grievance resolution (Whistle Blower Program) will support us to undertake appropriate remedial action/s and consider whether changes are needed to our existing modern slavery risk management strategy to enhance its effectiveness.

## 5. NEXT STEPS

The Modern Slavery Statement from the year ending 2020 -2021 identified the following key actions which have been successfully executed. Millennium will endeavor to build on these going forward.

Action Items from 2020 – 2021 Modern Slavery Statement	Reflections
<b>Ongoing training at all levels internally – including consideration of language and culture</b>	Millennium have developed and included within its Learning Management System a Millennium specific Modern Slavery Training Course
<b>Working with our Supply Chain partners to grow and share awareness of risks and understanding of how to control them</b>	<p>Millennium has commenced the overhaul of its Approved Supplier Program including the Supplier Code of Conduct Compliance</p> <p>Millennium transitioned to a National Cleaning Supplier reducing the Modern Slavery Risk due to the Suppliers robust supply chain and strong commitment to Modern Slavery prevention</p>
<b>Verification of outcomes using accredited 3rd party agencies</b>	Engagement of Intertek to conduct a Wage Compliance Audit across its key portfolio client sites

While we are pleased with the progress we have made thus far, we know we have more work to do to reduce the risk of modern slavery across our supply chains and operations. As we move through 2022 – 2023, we will continue to monitor for opportunities to improve our practices and will strive to raise awareness of modern slavery risks within our organisation and across our supply chains.

## Millennium Modern Slavery Responsibility Hierarchy

### Board of Directors

The Millennium Services Group Board of Directors (Board) is ultimately responsible for approving our Modern Slavery Statement and for ensuring appropriate risk management and mitigation processes are in place

### People & Risk Committee

The People & Risk Committee (PRC) assists the Board to oversee the health, safety and environment framework and the risk management strategy for preventing Modern Slavery Risk at Millennium and its Supply Chain. The PRC also reviews and endorses the Modern Slavery Statement to the Board

### Executive Management

Design and develop a Modern Slavery Risk framework and make available resources to identify and monitor the risks within business operations and in the supply chain, assign roles and responsibilities and provide a process for managing reported breaches







### Senior Management

This group is responsible for the Implementing the policies and procedures relating to modern slavery and ensure that our employees can disclose information about possible modern slavery risks in our business and supply chains in a safe and protected manner. They are also responsible for Communicating with stakeholders throughout the supply chain to ensure compliance.

### Account Management

This group is responsible for complying with our policies, procedures, and Code of Conduct in relation to Modern Slavery and undertake the training requirements on modern slavery risks as required. The group must also report any suspicions or breaches in relation to modern slavery risks within the business and supply chains.

Over the next year and beyond, we intend to focus on the following activities, in line with the six key phases of our action plan.

 <b>Commit</b>	 <b>Assess</b>	 <b>Adapt</b>	 <b>Address</b>	 <b>Track</b>	 <b>Communicate</b>
<ul style="list-style-type: none"> <li>• Learn from modern slavery experts both in Australia &amp; New Zealand as well as globally</li> <li>• Provide guidance and support to our suppliers</li> <li>• In addition to the National Employment Standards (NES), incorporate into our process internationally recognised standards for addressing modern slavery. <b>Example:</b> Ethical Trading Initiative (ETI) Base Code</li> <li>• Further enhance our processes to clearly capture how we review our Labour Hire and Good &amp; Consumables suppliers with complex supply chains and high risk for example, debt bondage practices, servitude of forced labour risks</li> </ul>	<ul style="list-style-type: none"> <li>• Evaluation and enhancement of our Approved Supplier Program</li> <li>• Ongoing assessment and review of our Labour Hire supplier base by conducting due diligence of their hiring and payroll practices</li> <li>• Commence further supply chain reviews to look at all levels of the supply chain to further understand Modern Slavery risks.</li> </ul>	<ul style="list-style-type: none"> <li>• Development of a supply chain review plan to expand supplier due diligence practices across the group with an initial focus on suppliers who provide Labour Hire services</li> <li>• Include all suppliers predominantly Labour Hire and Goods &amp; Consumables suppliers with spend of &gt; AU \$250,000 annually in the Property Council of Australia's Informed 365 platform and conduct a Modern Slavery assessment</li> </ul>	<ul style="list-style-type: none"> <li>• Further review of documentation, i.e., policy, procedures and guidance material across operations and supply chain</li> <li>• Enhancement of our internal audit regime across operations and the supply chain</li> <li>• Enhancement of our supplier relationship management program to further incorporate Modern Slavery assessments and discussions with key suppliers</li> </ul>	<ul style="list-style-type: none"> <li>• Establish and implement specific and quantitative targets</li> <li>• Launch of our standardised and clearly defined approved supplier prequalification program along with a well communicated remediation plan including the Whistle-blower Program that considers various scenarios to understand and assess, on a case-by-case basis, our ability to influence, the issues and breaches identified and reported</li> </ul>	<ul style="list-style-type: none"> <li>• Implement learnings from our clients, suppliers, and industry into our plans</li> <li>• Communicate our updated procurement process, policy and procedures to our people and suppliers</li> <li>• Enhance our staff training and knowledge sharing with the implementation of an interactive eLearning training module.</li> </ul>

#### REGISTERED HEAD OFFICE ADDRESS

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#### FOR FURTHER INFORMATION

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