

millennium

Modern Slavery **Policy.**

Adopted on 15 April 2019

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1 Scope & Purpose

The Millennium Services Group (Millennium) is a professional organisation providing cleaning, security, customer service and maintenance services to over 500 sites across Australia and New Zealand. We acknowledge 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. We do not tolerate slavery or human trafficking in any part of our business and are committed to ensuring that it does not take place in our supply chain.

We recognise that human rights concerns can arise not only in our own operations, but also via interactions with external parties – in particular our business relationships, customer interactions, supply chain management and the communities we serve.

This Policy applies to Millennium, its divisions, its wholly owned subsidiaries and our supply chain.

Millennium understands and accepts its legal responsibilities and has implemented policies and procedures in line with the Modern Slavery Act 2018. These policies and procedures are continually reviewed and improved.

2 Management Responsibilities

Millennium will:

- Conduct business in a way that respects the rights and dignity of people, and avoids complicity in human rights abuses, while complying with legal and regulatory requirements which incorporate the protection of human rights.
- Avoid causing or contributing to adverse human rights impacts through Millennium's own business activities and address such impacts if they occur.
- Have systems and processes in-place to mitigate the risk of slavery and human trafficking within its supply chain and apply checks where higher-risk areas are identified.
- Not practice, tolerate or support the following forms of slavery in any form
 - Debt bondage by pledging oneself to another in order to pay off a debt they have incurred with the other
 - Deceptive recruiting refers to sourcing of people to do a certain type of work or service they agree to do to only realise when they report for duty that they have been misinformed about the work
 - Child labor in its worst forms relating to the forced recruitment impacting their health and safety and morale
 - Slavery, servitude (coercion to provide services) and forced and/or compulsory behaviour

- Human trafficking (arranging or facilitating the travel or movement of a victim with a view to them being exploited)
- Committing any offence with the intention to commit human trafficking
- Aiding and abetting, counselling and/or procuring any of the above offences.
- Only use specified, reputable employment agencies to source labour, ensuring all employees have a right to work and are therefore protected by employee legislation
- Ensure our employees, clients and suppliers are aware of this policy using both verbal and written communication.

3 Employee, Supplier & Subcontractor Responsibilities

Millennium employees, suppliers and subcontractors will:

- Abide by the requirements of this policy, as per the above management responsibilities
- Conduct business in a way that respects the rights and dignity of people, and avoids complicity in human rights abuses, while complying with legal and regulatory requirements which incorporate the protection of human rights
- Avoid causing or contributing to adverse human rights impacts through Millennium's own business activities, and address such impacts if they occur
- Raise any concerns and report any actual or suspected modern slavery at Millennium or our business partners either to the appropriate line manager, Human Resources Department or via the Millennium Whistle Blower program

Any suspected breach of this policy will be investigated, and any person found to be in breach may face disciplinary action and being reported to the relevant authorities.



Royce Galea
Chief Executive Officer
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