CERTIS ◆ SECURITY

**Modern
Slavery
Statement
2023**

Disclosure Note

This statement has been made on behalf of Certis Australia Pty Ltd. This Statement covers all entities owned or controlled by Certis Australia Pty Ltd which are Certis Academy Australia Pty Ltd, Certis Security Australia Pty Ltd, Certis Security Australia (Victoria) Pty Ltd, Certis Security Australia (WA) Pty Ltd, Newcastle Security Pty Ltd, PSI Corporate Pty Ltd, Sydney Night Patrol & Inquiry Co Pty Ltd, and Corroboree Certis Indigenous Corporation.

These entities will be referred to in this Statement hereafter as "Certis Australia".

EXCLUSIONS

PSI Corporate Pty Ltd – this entity is not currently undertaking any commercial transactions.

AUSTRALIAN BUSINESS NUMBERS

ABN 51 602 871 287 – Certis Australia Pty Ltd
ABN 99 636 999 703 – Certis Academy Australia Pty Ltd
ABN 90 003 762 150 – Certis Security Australia Pty Ltd
ABN 41 105 638 254 – Certis Security Australia (Victoria) Pty Ltd
ABN 34 132 818 421 – Certis Security Australia (WA) Pty Lt
ABN 71 306 642 945 – Corroboree Certis Indigenous Corporation
ABN 11 124 839 461 – Newcastle Security Pty Ltd
ABN 24 611 391 998 – PSI Corporate Pty Ltd
ABN 11 000 013 098 – Sydney Night Patrol & Inquiry Co Pty Ltd

Contents

About Us

Certis Security Australia is a unique blend of people, cultures and expertise that make us who we are today. Our combined local and global experience dates back almost 100 years, and we are proud to reflect our history in our modern approach.

Backed by over 60 years of rich history in physical security and patented innovation in Singapore, Certis has grown from a security guard and escort unit to become a leading integrated security services provider for businesses around the globe – including in Australia. Integrating technology with our security services, Certis anticipates problems and provides innovative solutions tailored to any industry.

We are pleased to publish our fourth Modern Slavery Statement for the reporting period FY23.

Vision

To be **the most advanced integrated security services** partner globally, making our world safer, smarter and better by everything we do.

Mission

As **trusted partners**, we protect lives and assets and deliver integrated critical services.

Values

- **Safety**
- Professionalism
- Integrity
- Customer focus
- Team work
- Care
- Courage

2023 Modern Slavery
Risk Management Initiatives

In FY23 we continued to raise awareness about modern slavery risks among our employees, suppliers and contractors. We engaged external experts to assess potential modern slavery risk among our direct suppliers to ensure we focus our due diligence on our highest risk suppliers and supply categories. We conducted a desk-top risk assessment of a direct supplier in a high risk spend category (garment manufacture) and continue to work with our highest risk suppliers to ensure corrective action plans are implemented in a timely manner. Working with priority Tier 1 suppliers has enabled us to identify some potentially high-risk Tier 2 suppliers.

Our Plans for 2024

In 2024 we will review, extend, evaluate and improve our modern slavery risk management program, ensuring it reflects any updates or changes to the Commonwealth legislation. Our Modern Slavery Working Group will re-do our gap analysis and prepare a new action plan and three-year road map (2024 - 2026). Our priority will be to establish performance standards and evaluation criteria for our suppliers and contractors and support our suppliers to implement corrective action plans that strive for continuous improvement. Where feasible, we will engage and educate our Tier 2 suppliers identified via supplier modern slavery surveys. We will also work more closely with our lower spend suppliers to provide resources and support enabling them to better manage modern slavery risks in their operations and supply chains.

Our Plans Beyond 2024

Beyond 2024 we will build on the actions undertaken to ensure we continue to improve our approach to modern slavery risk management in a way that reflects any changes to the Commonwealth legislation. Engaging and educating our potentially highest risk and highest spend suppliers remains a priority as does working with and supporting our smaller suppliers in risk mitigation initiatives. To this end we will continue to distribute our modern slavery eLearning modules and guidance for SMEs and provide advice and support where we can.

A Brief Statement from Ying Loong Lee, Chief Operating Officer, Australia

Our 2023 Statement summarises steps we have taken to refine and expand our risk management and due diligence processes for modern slavery.

Assessment of potential risk among our direct suppliers suggests that our risk profile remains stable from previous reporting periods.

We continued to engage our highest spend and potentially highest risk suppliers in a modern slavery self assessment questionnaire, provided them practical improvement recommendations and reviewed actions they have taken to manage risk. We continue to work closely with these suppliers to ensure corrective actions are implemented so that together we can better manage our collective modern slavery risk.

We continue to map our Tier 2 suppliers and plan to engage and educate these suppliers during the next reporting period.

This Modern Slavery Statement builds on our previous Statements and highlights the actions we have taken in the FY23 reporting period. We remain committed to managing modern slavery risks in our operations and supply chain and embrace our responsibilities under the Modern Slavery Act 2018 (Cth).

This statement was approved by the Certis Australia Board on 29 September 2023.
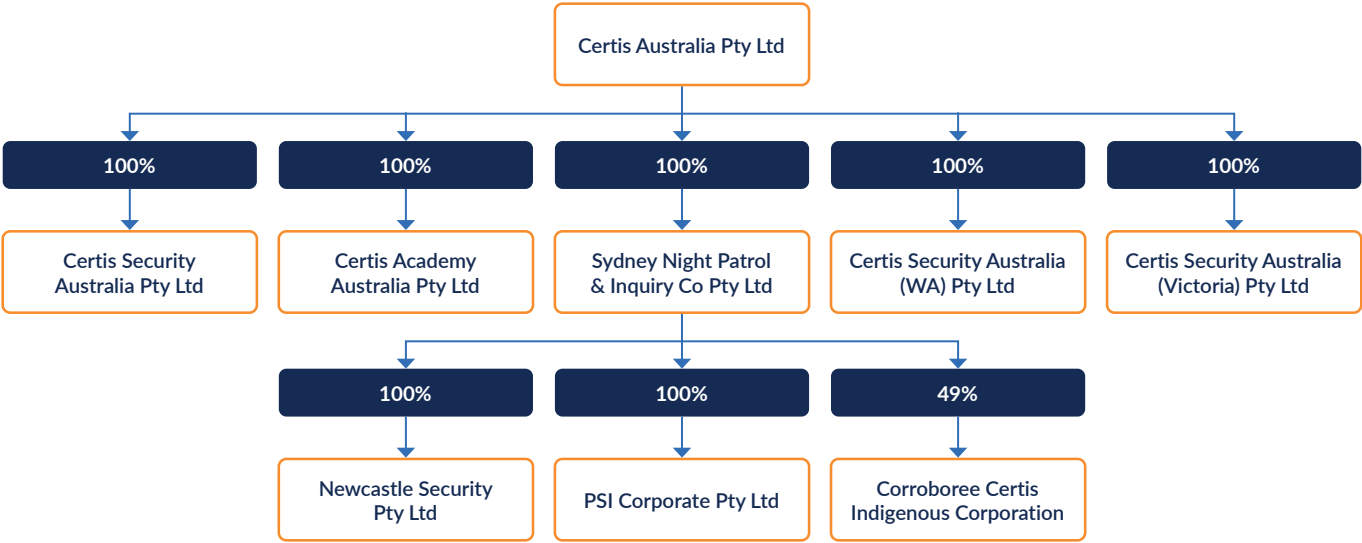
Reporting Criteria 1 & 2: About Certis Australia

Our Organisational Structure

Certis Australia Pty Ltd is the holding company and 100% owner of Certis Security Australia Pty Ltd, Certis Academy Pty Ltd, Certis Security Australia (Victoria) Pty Ltd, Certis Security Australia (WA) Pty Ltd, and Sydney Night Patrol & Inquiry Co Pty Ltd..

Sydney Night Patrol & Inquiry Co Pty Ltd owns 100% of Newcastle Security Pty Ltd and PSI Corporate Pty Ltd. Additionally, Sydney Night Patrol & Inquiry Co Pty Ltd is a 49% shareholder of Corroboree Certis Indigenous Corporation.

Certis Group Structure - Australia

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                        Certis Australia Pty Ltd
   ┌───────────┬───────────┬───────────┬───────────┬───────────┐
  100%        100%        100%        100%        100%
Certis      Certis      Sydney Night  Certis       Certis
Security    Academy     Patrol        Security     Security
Australia   Australia   & Inquiry     Australia    Australia
Pty Ltd     Pty Ltd     Co Pty Ltd    (WA) Pty Ltd (Victoria) Pty Ltd
              ┌───────────┬───────────┐
             100%        100%        49%
          Newcastle    PSI          Corroboree
          Security     Corporate    Certis
          Pty Ltd      Pty Ltd      Indigenous
                                    Corporation
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Our Operations

Certis Security Australia is headquartered in Sydney, with state and regional offices across the country in Brisbane, Newcastle, Canberra, Melbourne, Adelaide, and Perth. Group Certis is headquartered in Singapore, with an international presence that extends to Hong Kong, Macau, China and Qatar.
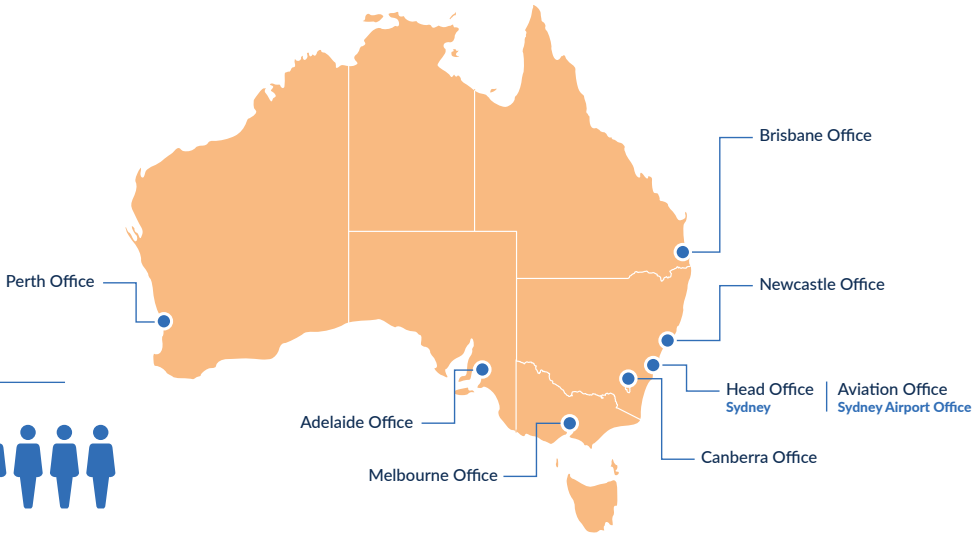
We have
4891
employees.

1,219 Female Employees
(Including 8 female indigenous employees)

3,672 Male Employees
(Including 29 male indigenous employees)

Brisbane Office
Perth Office
Newcastle Office
Adelaide Office
Head Office | Aviation Office
Sydney | Sydney Airport Office
Melbourne Office
Canberra Office

Physical Security

Our physical security services include:

- Enforcement services
- Integrated operations centre
- Security guards and/or officers
- K9 services
- Access control
- Australian Government Security Cleared Officers
- Rail Industry Worker Trained Security Guards

Aviation Security Services

Our aviation services throughout 8 Australian Airports include:

- Aviation screening
- Checked baggage screening
- Perimeter security patrol
- Anti-touting enforcement
- Traffic enforcement
- Airport pass issuance
- Customer greeting & queue management
- Landslide concierge coordination, taxis, hire cars, foot pedestrians
- Work Safety Officers, landslide & airside

Traffic Management

Our traffic management services include:

- Airport kerb-side traffic management
- Road works traffic management
- Event security patrol and crowd control

Work Safety Officers

Our work safety officers will, in accordance with aviation security requirements, conduct:

- Work Safety functions
- Worksite supervision Vehicle escorting

Mobile Patrols

Our mobile security patrol services and patrol guards include:
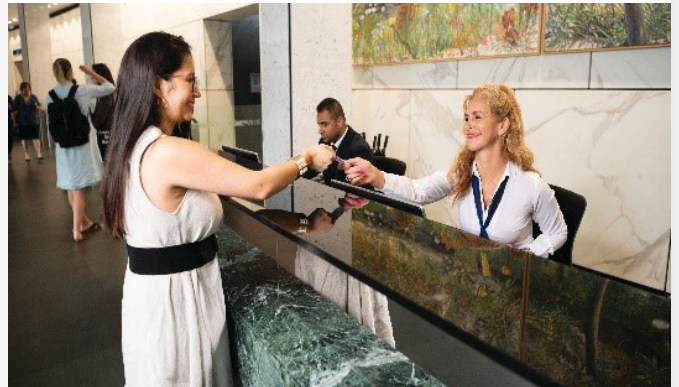
- Perimeter patrols
- Site inspections
- Alarm response
- Emergency response
- Patrol vehicles

Concierge & Customer Service

Our concierge & customer service solutions include:

- Corporate reception duties
- Meeting and greeting customers
- Signing in and escorting visitors
- Administration assistance
- Booking meeting rooms
- Allocating visitor parking

Screening services

Our screening services include:

- Baggage screening
- Passenger screening
- Mall room screening
- Freight screening
- Cargo examination screening

Temperature Testing

We provide security services together with products to help measure the temperature of your staff and visitors to reduce the risk of spreading COVID-19.
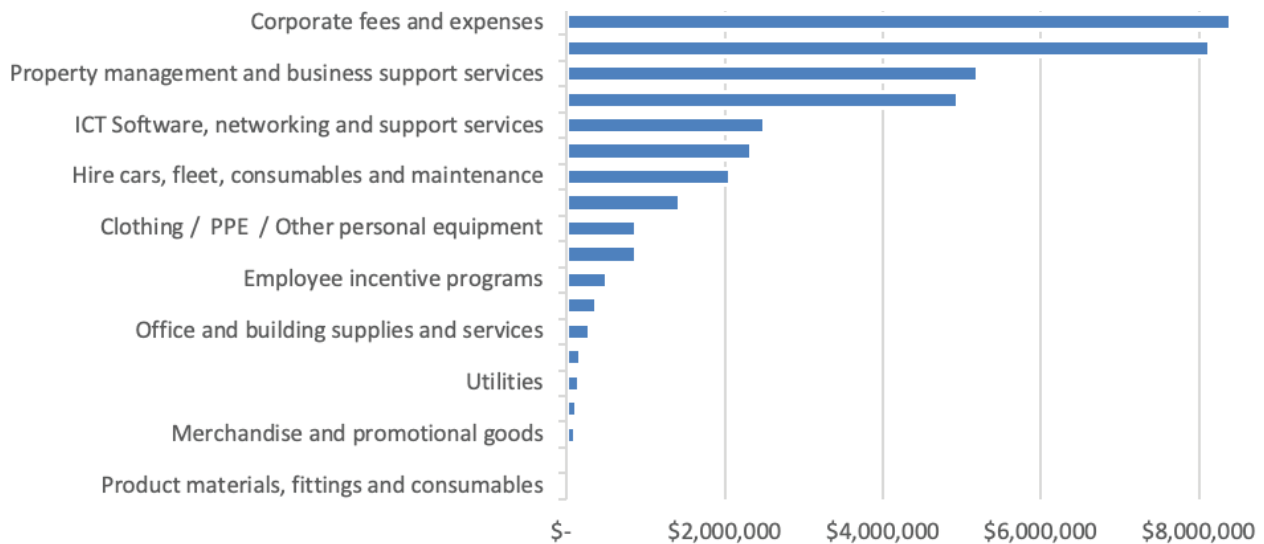
Our Supply Chain

In FY23 Certis Australia spent $38.5million with 141 suppliers of goods and services with spend greater than $18,000 per supplier. This figure does not include spend on our subcontractors that deliver security services on our behalf. Analysis of our subcontractors was undertaken in FY21 and will be redone in FY24.

Certis Australia's spend with Tier 1 suppliers and subcontractors is entirely onshore, with 100% of our suppliers located in Australia. The main categories of goods and services we procure are consistent year on year and include the following:

Rank	+/-	Spend Category	2022		2023	
			% Total Spend	Risk	% Total Spend	Risk
1	↔	Corporate fees and expenses	22%	Low	22% ↔	Low
2	↓	Property management and business support services	22%	Medium	13% ↓	Medium
3	↓	ICT and electronic equipment, components, and supplies	15%	High	13% ↓	High
4	↓	Hire cars, fleet, consumables, and maintenance	7%	Medium	5% ↓	Medium
5	↑	Professional services and consulting	10%	Low	21% ↑	Low
6	↔	ICT- software, networking, and support services	6%	Medium	6% ↔	Medium
7	↑	Print/Mail Provider	5%	Medium	6% ↑	Medium
8	↔	Utilities	1%	Medium	1% ↔	Medium
9	↓	Recruitment fees and services	5%	Medium	4% ↓	Medium
10	↓	Clothing, PPE, and personal equipment	3%	High	2% ↓	High
		Other	6%		6% ↔	

Figure 1 Spend by Procurement Category ($)

We acknowledge that modern slavery occurs in Australia (the Global Slavery Index 2022 estimates 41,000 people live and work in conditions of modern slavery in Australia) and that our local supply chain may be vulnerable. We recognise, however, that a higher level of risk will be found in the lower tiers of our supply chain. To that end, we are continuing the work started in 2022 to map our extended supply chain and identify potentially high-risk suppliers and supply categories in our Tier 2 supply chain (see also Case Study 2 in Certis Australia Modern Slavery Statement 2022).

Ensuring our direct suppliers are informed, educated and engaged to support us with this task has been an important focus in this reporting period.

Reporting Criteria 3: Modern slavery risks in operations and supply chain

Our modern slavery gap analysis and action plan developed in 2020 continued to inform our modern slavery risk management program. Following from that we have made progress in assessing and addressing our operational and supply chain modern slavery risks.

While we are confident that we do not directly cause modern slavery through our own operations, we acknowledge the possibility that we may inadvertently contribute to, or be linked to, situations of worker exploitation or modern slavery through supply chains. Our supplier and subcontractor due diligence processes are described in this section.

Operational Risks

Our 2020 modern slavery operational gap analysis (reported in our 2020 Modern Slavery Statement) remained relevant in this reporting period and clearly documents our operational gaps and risks.

Building on the due diligence undertaken of our security subcontractors in previous reporting periods, we conducted additional audits to ensure our modern slavery risks are effectively identified and managed (see also Criteria 4 and Case Study page 15.)

Supply Chain Risks

In FY23 we refreshed our supplier risk dashboard and analysed approximately $38 million of procurement spend for potential modern slavery risk. Four key risk factors were used to assess suppliers for potential modern slavery risk:

- **Industry sector** – Specific industry sectors (for example manufacturing, services, agriculture etc.) deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- **Geographic location** – Based on estimated in-country prevalence of modern slavery determined by a custom risk index developed by the external experts engaged to support our program. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers' headquarters which may have elevated risk of poor labour standards and modern slavery.
- **Workforce profile** – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used. We recognise that poor labour practices are present in some parts of our sector, and we are committed to conducting our business as a responsible and ethical member of our community.

High Level Findings

- Overall, there continues to be a moderate level of potential modern slavery risk in our supply chain.
- Potential risk by spend has remained consistent with findings reported in previous modern slavery statements.
- Approximately 19% ($7.4 million) of total spend was initially analysed as potentially high risk for modern slavery.
- Approximately one-quarter of our suppliers (or 33 suppliers) are considered potentially high risk for modern slavery.
- Ten of the 19 spend categories analysed are considered potentially high risk for modern slavery.

Risk by Spend

Analysis of spend across Certis Australia entities covered by this statement indicates that 19% of total spend is potentially high risk for modern slavery. This reflects the same level of high risk spend as reported in our previous Modern Slavery Statement and is consistent year-on-year.

Identifying and working closely with our contracted suppliers increases the impact of our efforts to manage risk in our supply chain. We continue to focus our due diligence efforts on potentially high-risk suppliers with whom we have established and longer-term relationships.

Risk by Spend (% Total Spend)

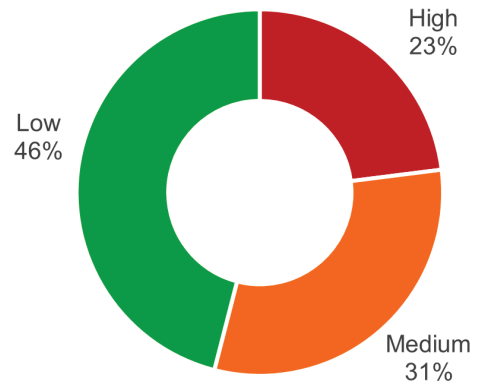High
19%

Low
43%

Medium
38%
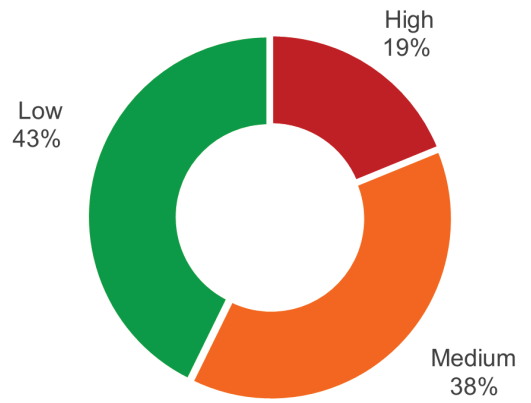
Risk by Supplier

Analysis of higher spend suppliers indicates that 33 suppliers or just under one quarter (23%) of the 141 suppliers reviewed are potentially high risk for modern slavery, a slight decrease on figures reported in our 2022 Statement.

31% of suppliers are considered to present medium-level risk and 46% were classified as low risk for modern slavery.

Risk by Total Suppliers (%)

High
23%

Low
46%

Medium
31%

Risk by Spend Category

Based on the four risk factors outlined above, we consider 10 of our 19 spend categories to be higher risk for modern slavery.

Our top five highest risk procurement categories are:

| **ICT, electronics and communications equipment** | **Clothing, Personal Protective Equipment (PPE) and other personal equipment** | **Property and facility maintenance services (e.g. maintenance and cleaning)** | **Office and building supplies and services** | **Employee incentive schemes (gifts, merchandise etc** |

ICT, electronics and communications equipment remain our highest risk category making up two thirds (66%) of our potentially high-risk spend. Property management and business support services are our largest medium risk spend category and consist of spend with national airports on goods and services such as rent, parking, security checks and passes, and utilities such as energy, water, and waste management.

Reporting Criteria 4: Actions taken to assess and address risk

Our 2020 modern slavery gap analysis and action plan developed with the support of an external provider continues to inform the implementation and review of our modern slavery risk management program. Our Modern Slavery Working Group will re-do the SD Strategies' modern slavery gap analysis in the next reporting period and refresh our action plan. This will ensure our updated action plan reflects any changes to the modern slavery legislative requirements and our own governance maturity in this area.

The following actions were completed in this reporting period:

Board and Executive Engagement

Our Board and executive leadership team remains engaged and supportive of our modern slavery risk management initiatives. Regular updates are provided to the Group Executive Committee through our quarterly reporting framework. Our Modern Slavery Statement is reviewed and discussed at Board level and signed off by the Board prior to publication.

Responsibilities for Modern Slavery

Certis' Australian-based Head of Compliance and QMS has overall responsibility for the implementation and review of our modern slavery risk management program and together with her team ensures relevant sections of the organisation are engaged and informed of new systems and processes for managing our risks. We plan to review existing KPIs and ensure modern slavery KPIs are integrated into relevant position descriptions by FY24.

Risk Framework

Our Australian-based Risk Group expanded our local risk registers to capture different types of risks, including modern slavery and human rights risks. Monthly reports are prepared locally against key risk indicators.

Modern Slavery Policy

Our stand-alone Modern Slavery Policy continues to drive our commitment and approach to modern slavery risk management. The Policy is accessible on our QMS and made available to external stakeholders or other interested parties on request.

Supplier Spend and Risk Analysis

With the support of external consultants, we reviewed our procurement spend and refreshed our Tier 1 (direct) supplier risk dashboard. Findings of the assessment were consistent with findings in previous reporting periods, with little substantive change in our risk profile.

Enhanced Supplier Due Diligence

In FY22 we focused on gaining a better understanding of the measures our major potentially high-risk suppliers are taking to manage modern slavery risk in their operations and supply chains. We invited our highest risk Australian based suppliers (who collectively account for over 50% of our high-risk procurement spend identified in 2021) to participate in a modern slavery supplier survey (see Case Study below).

Case Study: Assessing risk in our uniform and PPE supply chain

In 2023 we focused on understanding the risks associated with our major supplier of PPE and uniforms. We source uniforms from a small business that has less than 50 employees but has an extensive global manufacturing base and supply chain.

Due to the high-risk nature of the textiles, apparel and PPE manufacturing industries, we engaged external experts to conduct a deep dive assessment of this suppliers' policies, procedures and practices to further understand the risks and opportunities, and to help us develop a Corrective Action Plan (CAP).

Key findings of the assessment include:

- While the supplier demonstrates a high level of commitment to managing modern slavery risks (as documented in company policies), the level of governance maturity is low and evidence of policy implementation is lacking.
- The supplier indicated that several third-party audits have been conducted of its factories, however more work needs to be done to understand to what level labour rights and human rights issues are assessed in these audits.
- Although the supplier indicated it has a whistleblowing process in place, the process was not made available and could not be located on the company's website.
- Employees and suppliers are provided limited information on modern slavery, including whistleblowing, during onboarding processes. No additional training is provided.
- While multiple policies, along with our supplier's 'Modern Slavery Statement' indicate that the company intends to remediate adverse human rights impacts, it does not have a remediation framework in place.
- The company's Modern Slavery Statement indicates that it will terminate supplier contracts should modern slavery be identified. While this demonstrates a 'zero tolerance' approach, we will encourage our supplier (through the corrective action planning process) to engage and educate its suppliers to ensure outcomes do not negatively impact workers.

The supplier was very cooperative and a Corrective Action Plan has been developed to address these findings. We are working closely with the supplier to ensure they have the resources required for effective and timely implementation of the required corrective actions. In this way, we will be better able to assess, address and mitigate modern slavery risks in our shared supply chain.

Subcontractor Due Diligence

Our Compliance Team continued to engage subcontractors that support our workforce of direct employees. Our Subcontractor Evaluation Procedure ensures our subcontractors requiring evaluation are selected by our Compliance Team independent of the operations using a risk-based approach. This includes evaluating risk of worker exploitation and modern slavery.

The following categories were reviewed in subcontractor audits:

- Security and other industry licensing
- Insurances and certifications
- Company and business registrations, structure and ownership
- Human resources, payroll records and work rights (including VEVO checks)
- Worker health and safety
- CertisCX Portal usage

Comprehensive corrective action plans were developed for partial compliances and non-compliances.

Sub-Contractor Due Diligence Case Study

Eleven (11) subcontractor audits were conducted by Certis during the reporting period. When added to the eleven (11) audits undertaken in the last reporting period, these subcontractors account for close to 70% of sub-contractor spend.

Our evidence-based auditing program identified that the majority of our subcontractors are complying with their legislative and contractual obligations. As per findings in the last reporting period, opportunities for improvement were identified, such as formalising WHS processes and enhancing policies and procedures in this area.

High levels of compliance were observed in the following areas:

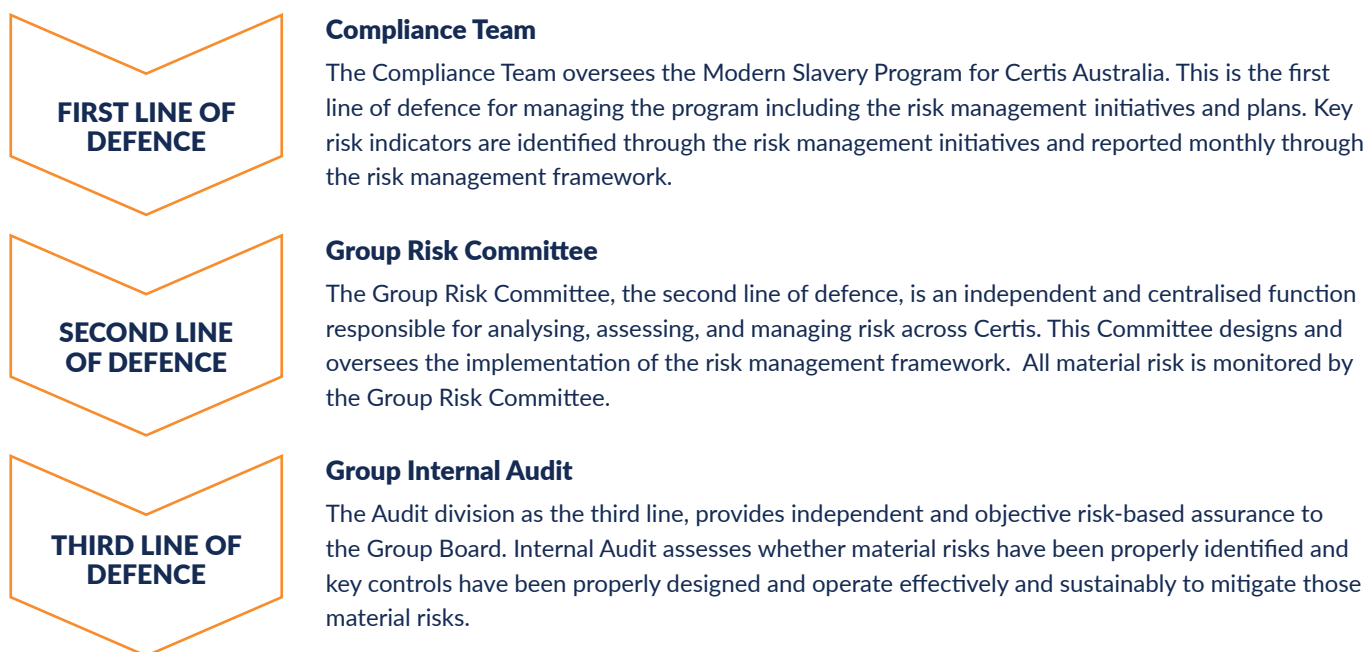- subcontractor staff are aware of their employment and labour rights;
- pay slips and leave entitlements are documented and recorded; and
- regular checks of work rights are undertaken using VEVO.

We will continue to implement our due diligence program with an aim to ensure that subcontractors comprising more than 80% of our annual subcontractor spend are audited on a one-to-three-year cycle.

Reporting Criteria 5: Effectiveness Assessment

Our modern slavery risk management action plan and due diligence processes are evaluated for effectiveness as part of our regular compliance reviews. The Compliance Team monitors the implementation of our modern slavery program initiatives and plans, and reports progress to the Senior Leadership Team annually for consultation and review.

Our Risk Assurance Framework includes the following components:

FIRST LINE OF DEFENCE

Compliance Team

The Compliance Team oversees the Modern Slavery Program for Certis Australia. This is the first line of defence for managing the program including the risk management initiatives and plans. Key risk indicators are identified through the risk management initiatives and reported monthly through the risk management framework.

SECOND LINE OF DEFENCE

Group Risk Committee

The Group Risk Committee, the second line of defence, is an independent and centralised function responsible for analysing, assessing, and managing risk across Certis. This Committee designs and oversees the implementation of the risk management framework. All material risk is monitored by the Group Risk Committee.

THIRD LINE OF DEFENCE

Group Internal Audit

The Audit division as the third line, provides independent and objective risk-based assurance to the Group Board. Internal Audit assesses whether material risks have been properly identified and key controls have been properly designed and operate effectively and sustainably to mitigate those material risks.

In 2023 we assessed the effectiveness of our actions against the following key indicators:

Focus Area	Example Activity	Effectiveness Assessment
Risk and governance	Board and Executive engagement. Modern Slavery Policy implementation. Updated Risk Framework.	Regular oversight on progress against modern slavery risk management plan by Compliance Team. Quarterly reporting to executive and board committees.
Procurement & Supply Chain	Supplier risk prioritisation. Supplier engagement. Supplier desk-top risk assessment (SAQ). Corrective Action plan review. Updated procurement policies. Updated contract clauses.	Ongoing due diligence of Tier 1 suppliers and deeper understanding of modern slavery risks in supply chain. Planned integration of modern slavery risk management into procurement processes and BAU.
Contractor Due Diligence	Contractor spend and risk prioritisation. Contractor engagement. Contractor audits.	Enhanced awareness of the issue among contractors. Ongoing improvements in contractor processes to manage risks associated with recruiting labour.
Awareness and Training	Modern Slavery eLearning. Awareness raising comms.	Increased awareness of modern slavery risks and mitigation actions among key staff, managers and executive.
Grievance and Reporting	Reviewed the Whistleblowing Policy and response mechanisms against UN Guiding Principles on Business and Human Rights. Improvement recommendations made.	Board engagement in Whistleblowing and remedy processes. Number of modern slavery or worker exploitation grievances received by Certis.

Reporting Criteria 6: Process of consultation with entities owned or controlled

The Certis Australia entities share the same Senior Leadership Team. As a member of the Senior Leadership Team, the Head of Compliance oversees the Modern Slavery Program for Certis Australia.

The Head of Compliance briefs the Senior Leadership Team on the progress of the Modern Slavery Program initiatives, plans, and the effectiveness of our program. This information is then cascaded through the Australian entities by the other members of the Senior Leadership Team.

Reporting Criteria 7: Other Information

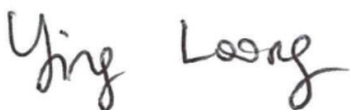**Work Health & Safety, Environmental, and Quality**

In the past, work health & safety, environmental and quality has been managed and certified to the ISO Standards under separate functional areas of the business. Upon review, we identified opportunities and benefits through integrating these areas of the business through our certification to ISO 45001 Occupational Health & Safety Management System, ISO 14001 Environmental Management System, and ISO 9001 Quality Management System,

This year we have started the journey to a fully integrated system. Through this, we can already see benefits of removing the segregation between the business units in the planning, coordinating and management of these interrelated functions. Bringing this all together as a whole assists in identifying and closing gaps and making sure everyone has access to and understands the policies, procedures and practices that we use to manage health and safety, the environment, and our quality standards.

We are looking forward to seeing how this harmonised system further enhances the process of continuous improvement in these important areas over the coming years.

Our Approvals

This statement was approved by the board of directors of Certis Australia Pty Ltd on 29 September 2023.

Ying Loong Lee
Chief Operating Officer, Australia

CERTIS
SECURITY

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of Certis Australia Pty Ltd as defined by the *Modern Slavery Act 2018* (Cth)[1] ("the Act") on 29 September 2023.

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of the board of directors of Certis Australia Pty Ltd as defined by the Act[2]:

Ying Loong Lee
Chief Operating Officer, Australia

Mandatory Criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory Criteria	Page Number/s
a. Identify the reporting entity.	**2**
b. Describe the reporting entity's structure, operations and supply chains.	**7**
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	**11**
d. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	**13**
e. Describe how the reporting entity assesses the effectiveness of these actions.	**16**
f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	**17**
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	**17**

*   If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

**   You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

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1.   Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

2.   Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001* (Cth)—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.