

Modern Slavery Policy

1. Purpose

Ultimate Security Australia is committed to conducting its business lawfully, ethically, and with integrity. This Anti-Modern Slavery Policy sets out Ultimate's commitment to preventing, identifying, and addressing modern slavery risks within its operations and supply chains.

This policy is designed to align with the requirements of the Modern Slavery Act 2018 (Cth) and reflects Ultimate's zero-tolerance approach to modern slavery, human trafficking, forced labour, servitude, and child labour.

2. Policy Statement

Ultimate Security Australia does not tolerate any form of modern slavery or human exploitation within its business operations or supply chains. We are committed to respecting internationally recognised human rights and to working proactively with our suppliers, contractors, and business partners to ensure that modern slavery risks are identified, mitigated, and addressed.

We expect all persons working for or on behalf of Ultimate Security Australia to act consistently with this policy and to support our commitment to ethical and responsible business practices.

3. Scope

This policy applies to:

- All Ultimate Security Australia employees, officers, and directors
- Contractors, labour hire workers, and consultants
- Suppliers, subcontractors, and service providers at all tiers of the supply chain; and
- Any other parties acting on behalf of Ultimate.

4. Definition of Modern Slavery

Modern slavery refers to situations where individuals are exploited and cannot refuse or leave work due to threats, violence, coercion, deception, or abuse of power. It includes, but is not limited to:

- Slavery and servitude
- Forced or compulsory labour
- Human trafficking
- Debt bondage
- Forced marriage; and
- The worst forms of child labour.

Modern slavery is a serious crime and a violation of fundamental human rights.

5. Governance and Accountability

Ultimate Security Australia senior management is responsible for overseeing compliance with this policy and ensuring appropriate systems and controls are in place to manage modern slavery risks.

Managers and supervisors are responsible for:

- Promoting awareness of modern slavery risks
- Ensuring this policy is implemented within their areas of responsibility; and
- Escalating any suspected or actual modern slavery concerns.

6. Risk Assessment and Due Diligence

Ultimate adopts a risk-based approach to identifying and managing modern slavery risks. This includes:

- Periodic assessment of modern slavery risks within our operations and supply chains
- Enhanced due diligence for higher-risk suppliers, services, or regions
- Supplier onboarding and screening processes that consider labour practices and ethical standards
- Ongoing monitoring of supplier compliance where appropriate

7. Supplier and Contractor Expectations

Ultimate Security Australia expects all suppliers and contractors to:

- Comply with all applicable laws relating to modern slavery and employment standards
- Not engage in any form of modern slavery, human trafficking, or child labour
- Maintain appropriate policies, controls, and training to manage modern slavery risks; and
- Require their own suppliers and subcontractors to meet equivalent standards.

Ultimate's contracts may include specific provisions prohibiting modern slavery and enabling audit, investigation, or termination where breaches are identified.

8. Training and Awareness

- Ultimate Security Australia is committed to building awareness of modern slavery risks through:
- Targeted training for employees involved in procurement, operations, and supplier management.
- Communication of this policy to relevant internal and external stakeholders, including all suppliers and contractors, to ensure broad awareness and understanding of these expectations; and
- Ongoing education to ensure personnel understand how to identify and respond to potential modern slavery indicators.

9. Reporting and Whistleblowing

Any person who becomes aware of, or reasonably suspects, modern slavery within Ultimate's operations or supply chains must report the concern promptly.

Reports may be made through:

- Line management.
- Human Resources; or
- Ultimate's [whistleblowing](#) or complaints mechanisms.

Ultimate Security Australia is committed to protecting individuals who raise concerns in good faith from retaliation, victimisation, or adverse treatment.

10. Response and Remediation

Where modern slavery risks or incidents are identified, Ultimate will take appropriate action, which may include:

- Investigating the matter promptly and sensitively
- Engaging with suppliers to implement corrective actions
- Suspending or terminating business relationships where necessary; and
- Supporting access to remedy for affected individuals, where appropriate.

11. Continuous Improvement

Ultimate Security Australia recognises that addressing modern slavery is an ongoing process. We are committed to continually improving our policies, procedures, and practices by:

- Reviewing this policy periodically
- Collaborating with suppliers and contractors on continuous improvement – for example, by sharing best practices, providing guidance or training, and helping build supplier capacity to prevent and address modern slavery;
- Monitoring legislative developments and industry best practice; and
- Incorporating lessons learned from audits, incidents, and stakeholder feedback.

12. Policy Review

This policy will be reviewed at least every two years, or earlier if required due to changes in legislation, business operations, or identified risks.



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