southern cross protection

An SIS Group Enterprise



# Modern Slavery Statement

# SXP Group

Reporting Period: 1 April 2025 to 31 March 2026

Date of Statement: 29 September 2026

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# INTRODUCTION

This Modern Slavery Statement is made pursuant to section 16 of the Modern Slavery Act 2018 (Cth) jointly on behalf of Southern Cross Protection Pty Ltd (ACN 094 077 255) and its subsidiary Charter Security Protective Services Pty Ltd (ACN 133 958 406).

To prepare this joint statement, each reporting entity covered by this statement was actively engaged in the development. This statement describes the actions taken by the SXP[1] Group to assess and address modern slavery risks in our operations and supply chains for the financial year ending 31 March 2026 ("2026 Reporting Period"). It is the seventh Modern Slavery Statement made by the SXP Group.

To ensure consistency, where we have maintained our approach to modern slavery, we have restated the same information provided in our earlier Statements. Additionally, we have included references to initiatives from previous periods for historical context and highlighted any significant progress made since our initial statement.

# ABOUT SXP GROUP

## OUR STRUCTURE AND OPERATIONS

SXP is a group of Australian entities, registered and headquartered in New South Wales. SXP has a national footprint offering a range of security services to local communities, businesses, and people, including:

- Security Patrols
- Asset Protection, First Line Maintenance and Security Guards
- Loss Prevention
- Alarm Monitoring with Rapid Response
- Risk Advisory Services
- Electronic Surveillance, CCTV and Perimeter Access Control

In the 2026 Reporting Period, SXP employed approximately 1064 employees and engaged approximately 2,066 contractor workers through our vetted and approved subcontractor network. This represents a total workforce of approximately 3,130 people supporting nationwide operations.

## WHERE WE OPERATE




[1] Reference to 'SXP Group', 'SXP', 'we', and 'our' is Southern Cross Protection Pty Ltd (ACN 094 077 255) and its subsidiary Charter Security Protective Services Pty Ltd (ACN 133 958 406).

### OUR SUPPLY CHAIN

In the 2026 Reporting Period, SXP engaged with a network of approximately 455 Tier 1 suppliers for the procurement and delivery of products and services. The majority of these Tier 1 suppliers are located in Australia, with some sourcing through domestic and international supply chains, and one international Tier 1 supplier based in India.

The table below outlines our 2026 Reporting Period suppliers by category, percentage of total supply expenditure, their location and where identified the location of their supply chains.

| Supplier Category | Percentage of Expenditure | Supplier Location |
|---|---|---|
| Security Service Providers | 85.40% | Australia |
| Vehicles and Fleet Management | 6.41% | Australia (supply chains extend to Asia) |
| Property, Utilities, Cleaning, Insurance and Legal | 3.16% | Australia |
| Professional and Consulting Services | 2.58% | Australia (supply chains extend to Asia), plus one Tier 1 supplier based in India |
| Technology, Equipment and Communications | 2.03% | Australia (supply chains extend to Asia) |
| Uniforms and PPE | 0.22% | Australia (supply chains extend to Asia) |
| Office Supplies and Sundries | 0.21% | Australia (supply chains extend to Asia) |

As our business predominantly comprises labour-based services, our security service providers are our largest category of Tier 1 suppliers and account for the majority of our supplier expenditure. This category of suppliers is primarily engaged to assist in the delivery of services in regional areas and for surge capacity resourcing.

The remainder of our supply chain comprises products and services used to support our staff, operations, and service delivery. These products and services include fleet, property, utilities, cleaning, travel, insurance, electronic security services and products, technology and communications, professional services, uniforms, personal protective equipment (PPE), and office supplies.

## ACTIONS TAKEN TO ASSESS RISKS OF MODERN SLAVERY

### ASSESSMENT OF RISK IN OUR OPERATIONS AND SUPPLY CHAIN

In the 2020 Reporting Period, we commenced a high-level risk analysis of our operations and Tier 1 suppliers to assess modern slavery risks. Our initial review of our Tier 1 suppliers was completed in the 2021 Reporting Period. In the 2022 Reporting Period, we commenced the review of Tier 2 suppliers with reviews continuing in the 2023, 2024 and 2025 Reporting Periods. In the 2023 Reporting Period, the majority of Tier 1 suppliers were reassessed through the implementation of our revised Ethical Sourcing Questionnaire. In subsequent Reporting Periods, including 2026, assessments of all prospective suppliers continued as a standard part of our due diligence processes.

Our risk analyses over the Reporting Periods have considered the following key factors to assess risks of modern slavery within our operations and supply chain:

- information from human rights groups and recognised public resources such as the Global Slavery Index[2];
- sector and industry risks (for example manufacturing, agriculture, security, cleaning etc.) considered high risk[3];
- product and services risks (for example electronics, computers, and garments) considered high risk[2];
- workforce profile such as the presence of vulnerable groups (for example base-skilled workers, migrant workers or non-English speaking workers)[3];
- geographical risks as indicated by the Global Slavery Index[2]; and
- analysis of our and our suppliers' governance frameworks (for example human resources and recruitment, and contractor procurement, management, and auditing).

[2] Walk Free Foundation, *Global Slavery Index* (2018, 2023)
[3] Australian Council for Superannuation Investors, *Modern Slavery Risks, Rights and Responsibilities: A Guide for Companies and Investors* (Feb 2019)

### RISK OF MODERN SLAVERY IN OUR OPERATIONS

SXP operates exclusively within Australia. We maintain strong human resource and industrial relations management policies and procedures. Our established processes include thorough checks to confirm employees are above the age of 18, possess the necessary rights to work in Australia, and are paid in accordance with Fair Work legislation. Our managers responsible for recruitment and employee management undergo appropriate training to ensure compliance with internal processes and relevant laws. Additionally, SXP actively raises awareness about modern slavery issues through training and education for our workforce.

Considering the location of our operations, local laws and protections, as well as our robust governance framework and accessible grievance mechanisms, SXP has evaluated the overall risk of modern slavery within our operations to be low.

A further mitigating factor for SXP in the security industry, is that the majority of our employees have to be licensed under relevant security industry legislation, which also serves to reduce the risk of modern slavery within our organisation.

### RISK OF MODERN SLAVERY IN OUR SUPPLY CHAIN

Based on our high-level analysis of modern slavery risk factors, we concluded that some parts of our supply chain have greater risk of potential modern slavery practices due to:

- the presence of vulnerable groups such as low skilled workers and workers with English as a second language;
- some products sourced from our suppliers, such as electronics and garments, carry a higher level of modern slavery risk due to source location and the presence of vulnerable workers;
- lack of visibility with complex or multi-tiered supply chains spanning across various countries, as oversight on working conditions is limited; and
- suppliers potentially not having adequate systems and controls in place to monitor modern slavery risks.

Due to potential modern slavery risks within our supply chain, we have undertaken actions to identify and reduce the risks during the 2026 Reporting Period.

## ACTIONS TAKEN TO ADDRESS THE RISKS OF MODERN SLAVERY

SXP maintains a commitment to mitigating modern slavery risks and establishing systems and controls to minimise the potential for modern slavery practices within our operations and supply chains. Below outlines the actions we have undertaken during the 2026 Reporting Period.

### GOVERNANCE AND POLICY FRAMEWORK

SXP is committed to corporate governance. We have a senior leadership team responsible for human resources, governance, risk, and legal compliance. Our board and senior leadership team together provide direction and leadership in the development, implementation and management of our modern slavery and governance framework across the group of companies.

SXP has various policies and procedures in place to promote ethical and legal business conduct, assist in protecting human rights, and minimise the risks of modern slavery in our operations and supply chains. During the Reporting Period we reviewed and where necessary refined our policies, procedures, and processes integrating modern slavery considerations and reinforcing measures to ensure ethical labour practices. The following policies and procedures set our expectations for our staff, suppliers, and subcontractors with regard to modern slavery:

- Code of Conduct Policy
- Modern Slavery Policy
- Whistleblower Policy and Procedures
- Contractor Management Policy and Procedures

Our Code of Conduct Policy outlines our standard of ethics and sets out the conduct and behaviour expected of all employees. With regard to modern slavery the primary professional responsibilities of all employees are the protection, preservation and safety of all people, and their respect, assertion, and maintenance of the law.

Our Modern Slavery Policy outlines modern slavery practices, our legal obligations, risk management processes, minimum standard of expectations for our subcontractors and suppliers; and provides information for individuals to report breaches. The policy is applicable to all employees, directors, subcontractors, suppliers, consultants, and any other third-party representatives.

Our Whistleblower Policy and Procedures is noted within our Modern Slavery Policy as one of the methods for reporting breaches. The Whistleblower Policy and Procedures outlines reportable conduct, protections for individuals who disclose wrongdoing, our legal obligations, and the means for individuals to make disclosures which include internal and external reporting.

Our Contractor Management Policy and Procedures outline our obligations, our subcontractor and supplier obligations, our processes on evaluation, onboarding, induction and training, ongoing management, and compliance auditing. Our contractor management procedures with regard to identifying and managing modern slavery risks in our supply chain are detailed further below.

## SUBCONTRACTOR AND SUPPLIER DUE DILIGENCE

All prospective subcontractors and suppliers of SXP are required to go through our evaluation process prior to being engaged within our business. Our evaluation process covers the following:

- Verification that the subcontractor or supplier is a legitimate operating entity;
- Verification of compliance documentation such as security and labour hire licences, insurances, and accreditations;
- Review of Company Policies and Procedures, and WHS and Quality documentation;
- Review of service experience and resourcing and operational capabilities;
- Reference and background checks;
- Assessment of potential modern slavery risks and associated controls in their operations and supply chain through our Ethical Sourcing Questionnaire; and
- Pre-engagement compliance audit to ensure their employees are above the age of 18, possess the necessary rights to work in Australia, are appropriately licensed and are paid in accordance with Fair Work legislation.

Only subcontractors and suppliers that are compliant with legal requirements, service experience, and have the required resources to meet their contractual obligations are utilised within our operations.

## ETHICAL SOURCING QUESTIONNAIRE

The Ethical Sourcing Questionnaire is a mandatory component of our evaluation process for all prospective subcontractors and suppliers. Its completion underscores our proactive approach to conducting thorough risk assessments to identify potential modern slavery risks. This initiative is crucial in enabling us to implement effective mitigation strategies within our supply chain.

## SUBCONTRACTOR AND SUPPLIER INDUCTION

Prior to commencement all new subcontractors and suppliers are inducted in the following key business and operational areas:

- Safety Management;
- Compliance Management (which includes Statutory, Regulatory and Licensing requirements; Modern Slavery; Bribery and Corruption; Worker verification and system onboarding; Rights to Work / Visa Conditions; Induction and training; Compliance Declarations; Grievance processes including Whistleblower procedures; Compliance Audits);
- Customer Service Delivery; and
- Operational Procedures.

## SUBCONTRACTOR AND SUPPLIER CONTRACT TERMS

In the 2021 Reporting Period, SXP reviewed its major subcontractor and supplier agreements and incorporated terms to provide assurance that our subcontractors and suppliers are aware of and comply with modern slavery obligations. These terms have continued to be implemented in all new and renewed agreements. These clauses include, but are not limited to, requirements for our subcontractors and suppliers to comply with relevant modern slavery laws and standards, our Modern Slavery Policy, and to notify us of any complaint or allegation of modern slavery within their business or operations.

## SUBCONTRACTOR AND SUPPLIER COMPLIANCE DECLARATIONS

Our subcontractors and suppliers are required to provide monthly or quarterly statutory declarations confirming their compliance with relevant contractual, industry and legal obligations. These declarations include confirmation from the subcontractor or supplier that it has conducted its business in compliance with modern slavery laws and has taken all reasonable steps to reduce modern slavery risks in its operations and supply chain.

## SUBCONTRACTOR AND SUPPLIER COMPLIANCE AUDITS

Our subcontractors and suppliers are subject to compliance audits to ensure they are acting in accordance with their contractual and legal obligations, including but not limited to Fair Work, Rights to Work, WHS, and Modern Slavery. During the Reporting Period, we conducted regular audits and due diligence checks on our suppliers to assess compliance with our policies, relevant legislation, and international standards related to modern slavery. Our compliance audits are conducted on our subcontractors and suppliers during the evaluation process, post-engagement, annually and/or in the event an allegation of noncompliance has been reported.

## SUPPLIER ENGAGEMENT

During the Reporting Period, we continued to enhance engagement with our suppliers, particularly labour providers and subcontractors, through our established induction and pre- and post-audit compliance processes. These interactions reinforced our zero-tolerance stance on modern slavery and communicated our expectations regarding compliance and ethical practices.

## TRAINING AND AWARENESS

SXP recognises the importance of our employees, subcontractors and suppliers understanding what modern slavery practices are, how to report known or suspected practices and how we will respond and address them. During the Reporting Period, we have continued to train and raise awareness on modern slavery as follows:

We have ensured that our Governance, Risk and Compliance team who are responsible for the management of our modern slavery risk processes received refresher training on:

- the requirements of the Modern Slavery Act;
- the requirements of our Modern Slavery Policy;
- what is modern slavery and examples of modern slavery;
- the impact modern slavery can have on our operations and supply chains;
- how to identify modern slavery risks; and
- what to do in the event modern slavery practices are suspected or detected.

To raise awareness across our broader workforce, including employees, subcontractors, suppliers and their employees, all workers are required to undertake the following as part of their induction and annual refresher training:

- Mandatory policy signoff for our Modern Slavery Policy
- Mandatory policy signoff for our Whistleblower Policy and Procedure
- Dedicated Modern Slavery e-learning module which outlines:
    - what is modern slavery and examples of modern slavery;
    - what we are doing to identify and address risks of modern slavery in our operations and supply chains;
    - information on our Modern Slavery Policy and where to find it; and
    - information on how to report modern slavery.

During the Reporting Period, SXP continued its periodic workforce-wide communications titled “Understanding and Using Our Whistleblower Policy and Procedure” and maintained “Speak Up” posters across our branches and permanent guard sites. These ongoing initiatives complemented our existing training modules and policy sign-offs, reinforcing awareness of available reporting mechanisms and encouraging our workforce to raise concerns safely and confidentially.

### WHISTLEBLOWER HOTLINE

Our Whistleblower Policy, which was first implemented in January 2020 and reviewed annually, outlines the various types of reportable conduct, protections for individuals who disclose wrongdoing, our legal obligations, means for individuals to make disclosures and our investigation processes. Our policy applies to any person who is, or has been, an employee, officer or director, associate, contractor, sub-contractor, consultant, or supplier (including their employees), and their respective family members. The policy is published and made accessible on our workforce communications platform and our company website.

Reporting of known or suspected misconduct including matters related to modern slavery practices may be raised with a number of identified personnel or bodies and through our whistleblower hotline. The hotline is managed by an external provider which assists in maintaining anonymity of the whistleblower and communications between SXP and the whistleblower. Any allegations of misconduct received are reviewed, appropriately investigated and where necessary corrective or disciplinary action is undertaken, including measures to prevent further breaches occurring.

### REMEDIATION

In the event modern slavery practices are found in our supply chain, we engage directly with our subcontractor or supplier to address the issue. We are committed to working with our subcontractors and suppliers to remedy issues. However, if the issues identified are severe or an appropriate remedy cannot be reached, the subcontractor or supplier agreement may be terminated and the matter reported to the appropriate authorities.

## ASSESSMENT & EFFECTIVENESS OF OUR ACTIONS

SXP is committed to ensuring continuous improvement in our modern slavery processes and recognises the importance of monitoring to determine effectiveness of our actions.

Our Governance, Risk and Compliance team is responsible for monitoring and reporting on the effectiveness of our modern slavery processes. These reports are regularly shared with SXP’s senior leadership team with the goal of collaborating on the management of modern slavery risks in the operations and supply chains, and process improvement.

To date SXP has not identified any modern slavery practices within its operations or supply chains. SXP considers the measures taken during the Reporting Period to have been effective in identifying and addressing potential modern slavery risks in our operations and supply chains.

The effectiveness of our actions has been determined by monitoring and analysing:

- Ethical Sourcing Questionnaire results;
- Compliance Audit results;
- Investigation and findings on complaints, grievances and reports of issues received;
- Completion rates of our Modern Slavery e-learning training modules; and
- Completion rates of Modern Slavery Policy sign offs.

## OUR FUTURE COMMITMENTS

SXP is committed to reducing modern slavery risks within our operations and supply chain. Over the coming financial year, we will:

- Continue to review our subcontractor and supplier arrangements;
- Continue to embed modern slavery requirements within our subcontractor and supplier management processes;
- Continue annual modern slavery refresher training for our workforce;
- Review our existing modern slavery training to ensure it remains current and relevant;
- Continue to raise workforce awareness of modern slavery risks and available reporting mechanisms; and
- Provide our workforce with an update on this modern slavery statement.

## CONSULTATION

The SXP Group takes a collective approach to addressing the risks of modern slavery. To prepare this joint statement, the senior leadership team of the reporting entities were actively engaged in the development of this statement. Our modern slavery policies, procedures, and processes, including this statement, have been developed collaboratively, and authorised by the directors of the reporting entities.

## APPROVAL

This statement was approved by the Board of Southern Cross Protection Pty Ltd on 29 September 2026.



Geoffrey Alcock
Managing Director
SXP Group