

Good People.
Good Work.



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Modern Slavery Statement FY24

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About Us

MA Services Group (MASG) is a wholly owned Australian company providing service solutions across security, cleaning, customer service, maintenance, risk and emergency services, throughout Australia.

Our customer focused solutions are delivered through a risk management approach by dedicated professionals committed to excellence.

Our company ethos of "Good People Good Work" sets our high standards of service across a myriad of business sectors and service streams.

MASG is focused on delivering our best services to our local and national markets. Our aspiration is not to be global, but globally aware, to provide efficient and productive solutions that deliver real benefits for all.

Core Values



Partnership



Empathy



Innovation



Accountability



Progressive



Agility

Message from the Managing Director

At MA Services Group (MASG), we firmly believe that every person has the right to live and work free from exploitation. We are committed to ensuring that modern slavery has no place within our operations or supply chains. Our compliance with the Modern Slavery Act 2018 (Cth), along with the implementation of targeted strategies, training, and supplier support, reflects our determination to assist in the identification and eradication of modern slavery - both within our own community and globally. We recognise that addressing modern slavery requires ongoing vigilance, collaboration, and accountability, and we remain dedicated to fostering ethical business practices that prioritise human rights.

This marks MASG's second Modern Slavery Statement, building upon the foundations established in our first year of reporting in 2023. Over the past year, we have continued to enhance our approach, strengthening our due diligence processes, expanding our training programs, and deepening our engagement with suppliers to ensure they align with our values and commitment to ethical sourcing. To support these efforts, we have initiated the MASG Modern Slavery and Ethics Committee, which will guide our response to modern slavery risks, drive improvements in our policies and procedures, and ensure our ongoing compliance with the Act.

We understand that meaningful change takes time and that our journey to combat modern slavery is an ongoing one. We are committed to continuous learning, improvement, and collaboration to enhance our impact. By working closely with our employees, clients, suppliers, and industry partners, we are not only upholding our legal obligations but also striving to make a positive difference. Together, we can contribute to a future where ethical business practices and human rights are at the heart of every decision we make.

Micky Ahuja
Managing Director



2024 Modern Slavery Management Initiatives

- Established the criteria of MASG's Modern Slavery Gap Analysis.
- Initiated the establishment of our Modern Slavery and Ethics Committee.
- Create a Modern Slavery Action Plan and develop MASG's three-year Roadmap.
- Continued to raise awareness about modern slavery risks among our employees, suppliers and contractors.
- Review Modern Slavery training syllabus elements.
- Establish refined relationship management protocols with our suppliers to engender communication and cooperation with MASG Modern Slavery audits.

2025 Modern Slavery Actions

- Initiated MASG's Modern Slavery Gap Analysis.
- Establish formal framework and guidelines for our Modern Slavery and Ethics Committee through consultation and specialist advisors.
- Tasked Modern Slavery and Ethics Committee to review, extend, evaluate and improve our modern slavery risk management program.
- Establish performance standards and evaluation criteria for executive managers, suppliers and contractors and support key suppliers to implement corrective action plans that strive for continuous improvement.
- Building on the success of our training program, we will expand its scope to equip our team with the skills to identify and manage emerging threats and opportunities. This includes enhancing their understanding of grievance mechanisms and implementing effective modern slavery remediation processes.

Where the Future Lies - Beyond 2025

- Utilise our Modern Slavery Gap Analysis data as a starting point for future reporting and analysis.
- Consolidate and support our Modern Slavery and Ethics Committee to achieve all goals.
- Build on the actions undertaken to ensure a continuous improvement approach to modern slavery risk management.
- Consistent review of performance standards of MASG management and suppliers relating to Modern Slavery corrective actions.
- Engaging and educating our potentially highest risk and highest spend suppliers, along with subcontractors, remains a priority, as is supporting smaller suppliers in risk mitigation initiatives.



Criteria 1 & 2: Structure, Operations and Supply Chain

OUR ORGANISATIONAL STRUCTURE

MASG is a 100% Australian owned company operating since 2011 providing comprehensive service solutions across physical and electronic security, customer service, cleaning and maintenance.

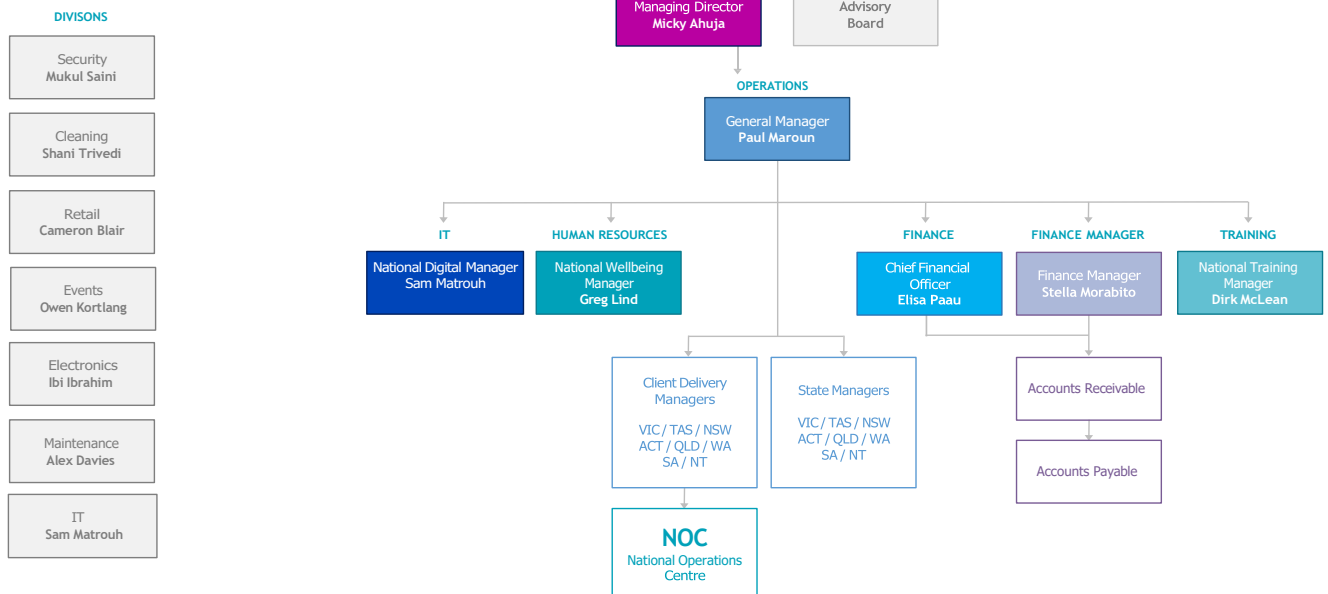
Led by founder and Managing Director, Micky Ahuja, we have extensive national capability and local expertise. With our expansive presence, MASG seamlessly delivers operational support across the country, forging close and enduring relationships with our valued clients.

Our knowledge of local dynamics and challenges empowers us to tailor our services to each region's specific needs, ensuring our clients receive personalised solutions that resonate with their unique requirements.

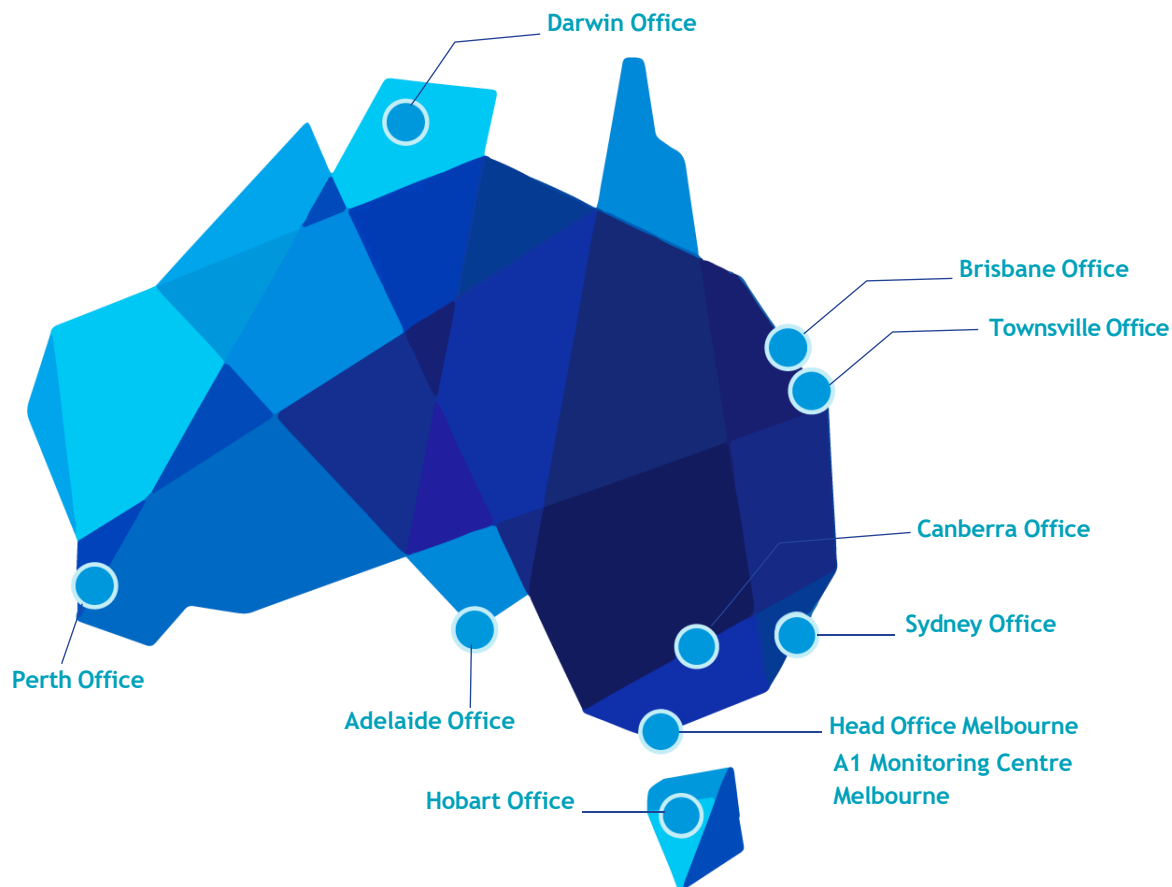
Within each state, we maintain dedicated operational resources and offices, strategically positioned to facilitate swift decision-making and responsiveness. This localised approach guarantees that our clients receive prompt and efficient support, regardless of their location.

The result is a seamless and integrated network that delivers top-tier services with a personalised touch, driving the growth of close and long-term relationships with our clients.

MASG - Company Organisational Chart 2025



OUR OPERATIONS



M.A Services Group is headquartered, and has our own A1 Monitoring Centre, in Melbourne with state, territory and regional offices across the country in Sydney, Adelaide, Perth, Brisbane, Townsville, Darwin, Hobart and Canberra.

OUR PEOPLE

3500+

National employees



1:1.5 talent workforce ratio
of female to male

485

Individuals facing social
and economic challenges
including employees who
identify as Indigenous or
Torres Strait Islander people

SERVICE STREAMS



Physical Security

- Guarding
- Access Control
- Emergency Coordination

Mobile Patrols

- Scheduled and adhoc
- Alarm Response
- Asset Protection



Electronic Security

- A1 Monitoring Centre
- Project Management
- Scheduled and Reactive Maintenance

Retail and Loss Prevention

- Customer Service
- Covert Investigations
- Collaboration with Law Enforcement



SERVICE STREAMS



Critical Infrastructure

- Transport, Ports and Marine Asset Protection
- Screening
- Emergency Response

Customer Service & Concierge

- Corporate Reception Duties
- Mailroom Services
- Escort



Event Security

- Crowd Control
- First Aid
- RSA

Cleaning and Maintenance

- Scheduled and Adhoc
- Specialist cleans
- Project Management



OUR SUPPLY CHAIN

MASG’s third party expenditure was approximately \$23.6M in 2024 across 25 select and approved suppliers.

Our supply chain consists of a diverse network of Australian suppliers and specialists, some of whom may engage Tier 2 suppliers internationally.

We recognise the complexities of our supply chain, encompassing:

- Products provided to MASG by suppliers;
- Services provided by suppliers; and
- Products and services used by indirect suppliers.

As explored, MASG’s operations are diverse, both in scope and geography. We continue to work on better understanding our supply chains during this reporting period.



Throughout the coming reporting period MASG will build on our understanding of risks amongst our supplier network through engagement with suppliers and contractors.

MASG’s major suppliers provide products and services that are listed in the table below. These provide long term and stable supply to enable MASG to achieve our objectives.

Major Source	Source Country
Labour Hire	Australia/New Zealand
Vehicles/Fleet Management	Australian distributors with international supply chains
Technology, equipment and supplies	Australian distributors with domestic and international supply chains.
Uniforms	Australian based manufacturers with international supply chains
Corporate services and supplies such as utilities, cleaning, office fit out, consulting and legal services	Australia with potential international supply chains
Travel Services	Australia



Criteria 3 - Risks of Modern Slavery practices

IDENTIFYING RISKS

Modern slavery is a term used in policy and law to describe forms of exploitation that constitute serious violations of human rights, including human trafficking and forced labour.

MASG takes a risk-based approach to assessment and identification of modern slavery in our business and supply chains, based on business activity and workforce demographics.

Our operations are governed by our internationally ISO 9001:2015 certified Quality Management System and underpinned by robust due diligence, internal standards, processes and procedures including:

- Modern Slavery Policy
- Quality Assurance Policy
- Quality Management Plan
- Ethical Conduct and Whistleblower Standard
- Contractor and Supplier Standard
- Corporate Social Responsibility Standard
- Workplace Relations Standard

MASG's risk profile is low due to our operations being confined to Australia and New Zealand where regulation and enforcement is strong.

Acknowledgement - We do acknowledge that the risks of modern slavery can manifest within both our operations and supply chains, given the complex and diverse nature of our business.

The broader services industry has been identified as a sector with elevated risks for modern slavery. Within this industry, modern slavery risks may include violations of workplace laws, fraudulent subcontracting arrangements, underpayment of wages, and job insecurity.

MASG leads by example in addressing these risks within a high-risk industry. By adopting and promoting ethical practices, we protect our workforce, support our clients and customers, and safeguard the health and reputation of our business and the broader industry.

This commitment strengthens our operations and reinforces our dedication to combating modern slavery in all its forms.

Process - MASG conducts risk assessments to better understand where potential issues and greater risk may arise and where to prioritise and focus our efforts. These assessments consider not only modern slavery risks, but also broader human rights risks which could indicate a supplier has inadequate controls in place to prevent against modern slavery.

We continue to develop and utilise a variety of risk-based tools to understand and assess the risk of modern slavery and broader human rights issues in our operations and supply chains. In FY24, these included:

- Continued mapping of supply chains
- Undertaking a risk identification exercise (e.g. based on geographic / industry risk), and
- Enhancing relationships with all suppliers to enhance communication, engender compliance and increase our support

These tools are described in more detail in sections ahead. MASG continues to use intelligence gathered from insights obtained via our internal grievance mechanisms, discussions across our client and community partnerships, as well as utilising several different tools and databases to help us identify which countries, services, industries and products pose the highest risks.

RISK STATUS

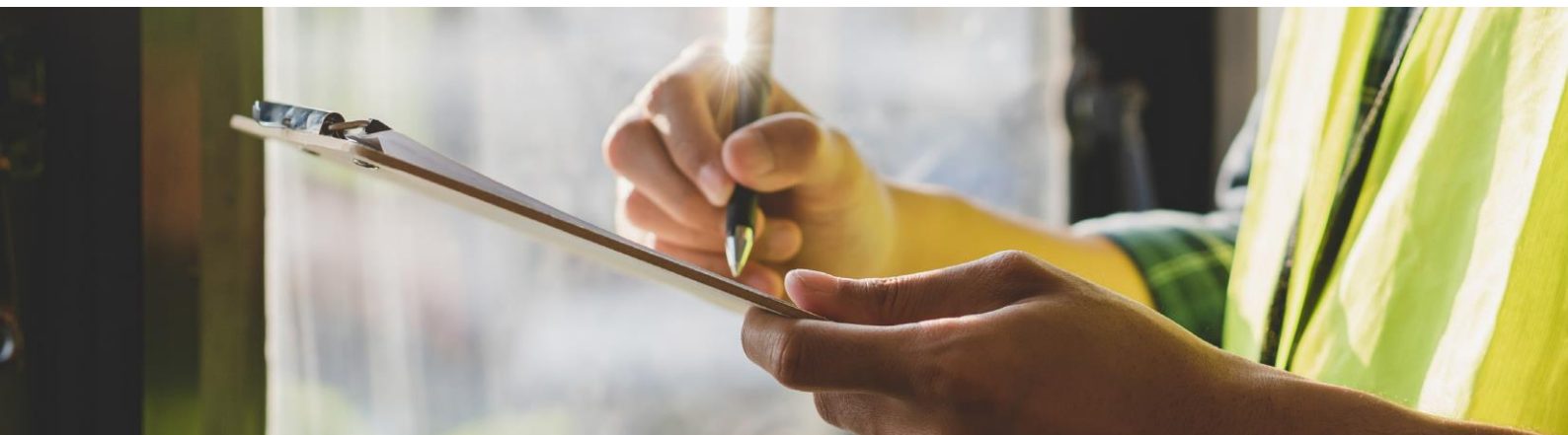
Within our current, and previous reporting timeline, MASG has not identified any instances of modern slavery in our supply chain or own operations.

As a business we understand there are risks or indicators which could lead to identifying cases of modern slavery.

Our risk assessment finding is due partly to the robust safeguards we have implemented and to the decisions we have made about the structure and nature of our business.

MASG continues to recognise the following modern slavery risks or indicators as having the greatest potential to exist within our operations and supply chain:

- **Labour** - MASG's largest areas of spend is labour. Our labour force is primarily based in Australia and employed directly by MASG.
- **Uniforms** - MASG procures uniforms, solely from suppliers in Australia. It is recognised that some elements of these uniforms are sourced in other countries, particularly in regions where textile and garments industry are identified as an area of higher modern slavery risk.
- **Vehicles** - MASG procures vehicles solely from suppliers in Australia. We recognise that, similar to uniform procurement, the vehicles are sourced in other countries.
- **Technological Devices and Components** - MASG procures technology, including computers, servers, and IT services, some of which are sourced from regions with known risks of modern slavery in the electronics industry. Similarly, our Electronic Division relies on specialized devices like cameras and security systems, often sourced from global suppliers in regions prone to modern slavery risks.



TOP 4 HIGHEST RISK PROCUREMENT CATEGORIES



ICT, Electronics and
Communications
Equipment



Clothing, Personal
Protective Equipment
(PPE) and other personal
equipment



Property and Facility
Maintenance Services (eg.
maintenance and cleaning)



Office and Building
Supplies and Services



Criteria 4 - Actions Taken to Assess and Address Modern Slavery

The risk of modern slavery is a serious issue. The Owner and Managing Director of MASG and the Senior Leadership Team continue to be engaged in reviewing our progress in identifying modern slavery issues within higher-risk parts of our businesses and supply chains.

MASG works with its industry specialists to ensure that all work undertaken by MASG is compliant with applicable human rights, safety, sustainability and employee wellbeing objectives and obligations.

MASG takes the following actions to assess and address modern slavery:

- Initiated Gap Analysis to provide baseline for future reporting on Modern Slavery within our own, and our suppliers supply chains.
- Establish and support MASG's Modern Slavery and Ethics Committee. This committee is led by MASG Managing Director, Micky Ahuja and is comprised of a minimum of two management and two frontline personnel representatives. The committee has the authority to coopt the services of specialist consultants and Subject Matter Experts ensuring discussions and investigations are current, aligned with the Modern Slavery Act 2018 (Cth) and compliant with all relevant legislation and regulations.
- Create MASG Modern Slavery Action Plan and three year Roadmap.
- Put in place protections for our workers, which include vulnerable workers (eg, visa holders) including an Enterprise Agreement approved by the Fair Work Commission, employment agreements written in plain English setting out the employee's rights and entitlements as well as our obligations.
- Review and implementation of revised training and induction modules.

- Establish an internal audit process aligned with our Quality Management System to ensure all MASG contracts with third parties have undergone our rigorous Modern Slavery risk assessment prior to engagement.
- Maintain MASG's regular Risk Assessment at all client sites.
- Only conduct business with suppliers who abide by and support MASG's Modern Slavery obligations.

RESPONSIBILITIES FOR MODERN SLAVERY

MASG's National OHS Risk Compliance Manager has overall responsibility for the implementation and review of our modern slavery risk management program and, together with support from this team, and ongoing efforts of our Modern Slavery and Ethics Committee, will ensure relevant sections of our organisation are engaged and informed of new systems and processes for managing our modern slavery risks.

RISK FRAMEWORK

MASG's Risk Compliance team 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 which is reported to our Executive Committee, Modern Slavery and Ethics Committee and Internal Audit.

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 MASG's company website and made available to external stakeholders, or other interested parties, upon request.

SUPPLIER SPEND AND RISK ANALYSIS

MASG has refreshed our Tier 1 (direct) supplier risk dashboard. Findings of the ongoing assessments were consistent with findings of previous statements with little change in our risk profile.

ENHANCED SUPPLIER DUE DILIGENCE

In FY24 we obtained a clearer understanding of the measures taken by our major 'potentially high risk' suppliers to manage modern slavery risk in their operations and supply chains. We worked with our suppliers to revisit their historic modern slavery record and implement a corrective action plan. We will continue to work with these selected suppliers to ensure corrective actions are implemented as required.

MODERN SLAVERY ROADMAP

Utilising the findings of MASG's Gap Analysis, and acknowledging MASG's risk in relation to Modern Slavery is low, we are moving forward to develop a concise and effective roadmap to guide our planning and future achievements.

MASG has established our initial Modern Slavery Roadmap encompassing the current year which will be reviewed and expanded to cover the following three years.

MASG Modern Slavery Roadmap

Area of Focus	FY2025 - 1st half	FY25 - 2nd half
Governance and Due Diligence	Continue to educate and engage Executive Committee and Senior Leadership Team on modern slavery compliance requirements and emerging risks and opportunities. Formalise responsibilities / accountabilities for managing risk into employee roles and position descriptions	Establish Executive Committee level modern slavery targets and/or KPIs.
Risk Management	Formally incorporate modern slavery assessment into risk management framework (and board risk appetite statement). Undertake risk assessments of subcontracting arrangements	Build on existing risk monitoring tools to effectively monitor current and potential future modern slavery risks.
Procurement and Supply Chain	Roll out new procurement policy and system and communicate widely to relevant personnel. Develop a supplier desk-top review and auditing schedule and ongoing evaluation process.	Map contract terms and conditions against supplier expectations and assessment framework to ensure compliance with terms and conditions are assessed and enforced - focus on high-risk, high-volume suppliers.
Human Resources, Awareness and Training	Continue to roll out our modern slavery MASG LMS eLearning modules to relevant staff internally.	Formally include modern slavery information in contractor onboarding processes. Mandate completion of updated modern slavery training modules for corporate staff (account managers, operations).
Grievance and Reporting	Continue to monitor whistleblower channel for modern slavery or human rights reports.	Review and update grievance and whistleblowing systems to include modern slavery and better align with the UN Guiding Principles on Business and Human Rights.

Criteria 5 - Assessment of the effectiveness

MASG recognises the need to continually assess the effectiveness of the actions we take to both gauge and address modern slavery risks. We proactively overlay our robust Quality Management System Standards and processes to monitor, measure and report our Modern Slavery compliance. MASG's Quality Assurance team is integral to the provision of unbiased auditing and evaluation of our Modern Slavery achievements.

Currently we track our performance through a combination of internal and external mechanisms, and we use these mechanisms to assess the performance of each activity undertaken.

Insights drawn from these measurements inform our current risk management approach and feed into our overall modern slavery commitment. In FY24, we have continued to assess the practicality of these measurements, identify gaps, and incorporate changes into a broader effectiveness and evaluation framework.

Operational elements which contribute to our assessment include:

- The number of complaints raised in relation to employment terms or conditions in so far as those complaints may relate to modern slavery
- The retention rate of personnel (taking into account the industry average retention)
- The results of routine reviews of its operations
- The results of external audits and reviews.

The assessment of the actions taken by MASG to address modern slavery tell us that MASG is actively and successfully participating in the eradication of modern slavery.

MASG's Quality Assurance team audits will be reported to our Modern Slavery and Ethics Committee twice yearly.



Criteria 6 – Consultation with Subsidiaries

Criteria 6 requires MASG to provide information on the consultation process undertaken by the reporting entity (MASG) with any entities that it controls or owns or which it is issuing a joint statement.

MASG does not control or own any other entities and is not issuing a joint statement.

Criteria 7 - Other Information

MASG is confident that the risk of Modern Slavery within our operations, and those of our suppliers, is low. We acknowledge that the risk of Modern Slavery is invariably present and it is incumbent upon us to maintain our motivation and proactive management processes to ensure we protect all community members.

OUR WAY FORWARD

MASG's Modern Slavery Framework continues to guide our organisation-wide response to the risks of modern slavery within our business and the services industry. This framework, along with supporting processes, is regularly reviewed by our Leadership teams and is the focus of our newly formed Modern Slavery and Ethics Committee. This will ensure it remains fit for purpose in an evolving business and regulatory environment.

As we move into the FY2025 reporting period, MASG remains focused on enhancing the effectiveness of its modern slavery risk identification and management practices by:

- **Launching our Modern Slavery and Ethics Committee** and related Quality Audits which will capture modern slavery risks and actions, along with broader ESG efforts, to ensure transparency and accountability.
- **Enhancing training and capability-building initiatives on Modern Slavery** through multiple channels, such as employee induction programs, online learning modules, face-to-face training, toolbox talks, and internal communication platforms, to build and further improve organizational awareness and action.
- **Tailoring our modern slavery training modules** to ensure relevance for both leaders and frontline employees, while expanding the reach and effectiveness of these training efforts.
- **Increasing relationship and communication initiatives** for suppliers on modern slavery risks and the actions MASG is taking to prevent them, ensuring a collaborative approach to risk mitigation.
- **Strengthening engagement with like-minded organisations**, including clients, suppliers, government bodies, and community groups, to broaden our understanding, raise awareness, and develop solutions to mitigate and remediate modern slavery risks across our supply chain.
- **Completing third party social audits** across our Australian operations, further advancing our efforts to uphold ethical practices and address social risks within supply chains.
- **Refinement and enhancement of MASG's approved supplier register** and robust auditing to better identify high-risk suppliers and ensure they are prequalified based on ethical, health and safety, and environmental standards, while confirming their adherence to our Modern Slavery Policy.
- **Strengthening ethical procurement processes** to ensure thorough due diligence is undertaken before entering into supplier relationships, with an ongoing review of supplier modern slavery responses as part of continuous monitoring.
- **Continuing to refine procedures and guidelines** to assist staff in taking appropriate action when modern slavery risks are identified or suspected, including clear protocols for supplier engagement when concerns or incidents are raised.
- **Enhancing our modern slavery audit and compliance program**, ensuring it remains robust and responsive to the risks identified.
- **Ongoing review** of MASG's Modern Slavery and Ethics Committee to ensure alignment and continuous improvement.



Good Pe

In FY2024, MASG's efforts will continue to focus on building organisational resilience, robust auditing and quality management processes.

This goal is supported by our willingness to resource our company with all necessary internal and external specialist advice and maintain an openness to support and guidance within this space.

As a people-centric business driven by a people-first philosophy, we measure our success by the tangible impact of our efforts to identify, manage, and mitigate modern slavery risks within our operations and supply chain. We remain committed to continuous assessment and improvement to ensure meaningful change.

Signed,



Micky Ahuja
Managing Director
M.A Services Group Pty Ltd
30 September 2024

We are everywhere you need us to be.



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Our industry associations

