



# SPL

## MODERN SLAVERY STATEMENT

REPORTING PERIOD  
FY23/24

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DONE DIFFERENTLY.

# TABLE OF CONTENTS

Acknowledgment of country	3
Context	3
Our stand	3
Introduction	3
About us	3
Organisation structure	4
Management of modern slavery risks	5
Identifying modern slavery risk in our operations and supply chains	5
Our responsibilities	7
Actions taken to assess and address modern slavery risks	7
Site visits	7
Audits	7
Policies	7
Annual supplier questionnaire	7
Assessing effectiveness	8
Speak up policy and human rights and social responsibility policy	8
Modern slavery awareness training and education	8
Summary	8
Consultation across our business	8
Statement availability	8

## ACKNOWLEDGMENT OF COUNTRY

SPL acknowledges the Traditional Custodians of the land on which we live, work and conduct our business operations.

We acknowledge the continuing connections of Aboriginal and Torres Strait Islander Peoples to Country and community.

We pay our respect to their Elders, past and present, and extend that respect to all Aboriginal and Torres Strait Islander people.

## CONTEXT

The Modern Slavery Act 2018 (Commonwealth) came into force on 1 January 2019. It requires Australian entities with a minimum consolidated revenue of \$100 million to report on the risk of modern slavery in its operations and supply chain and the steps they are taking to respond to the risks identified.

This is the second annual statement by SPL, and we are proud of the progress we have made and continue to make towards mitigating the risk of instances of modern slavery in our business, operations and supply chain. While we have had no known instances of modern slavery in our business or supply chain, we remain committed to addressing the risk of modern slavery, engaging with our supply chain and continuing to develop our people to promote the awareness of our responsibilities.

## OUR STAND

SPL recognises that modern slavery practices are a serious violation of human rights, and we do not stand for any form of modern slavery in our business or supply chain. We believe all workers should be treated with dignity and respect and recognise each person's rights to fair work conditions, justice and freedom.

## INTRODUCTION

This Modern Slavery Statement is made on behalf of SPL Holdings (ABN 85 600 456 808) and the associated entities (listed below) collectively referred to in this Statement as 'SPL' or 'the Group'. This Statement is made for the purposes of the Modern Slavery Act 2018 (Cth) and is for the period 1 July 2023 to 30 June 2024.

ENTITY	ABN
Specialised Linen Services (Adelaide) Pty Ltd	37 610 545 974
Specialised Linen Services (Albury) Pty Ltd	44 141 792 083
Specialised Linen Services (Brisbane) Pty Ltd	36 601 098 060
Specialised Linen Services (Cairns) Pty Ltd	45 605 037 189
Specialised Linen Services (Melbourne) Pty Ltd	87 096 726 760
Specialised Linen Services (Sydney) Pty Ltd	79 115 941 010
Specialised Linen Services (Perth) Pty Ltd	55 611 100 371

## ABOUT US

SPL provides premium quality linen and laundry services to a wide range of industry segments nationally. With an evolving requirement to meet the demands of our customers, SPL is leading the way through technological innovation and agility within the industry.

SPL continues to grow rapidly. With over one thousand employees, SPL has a presence in Perth, Adelaide, Melbourne, Sydney, Brisbane, Mackay, and Cairns, with depots servicing regional clients in Warrnambool, Albury and Colac.



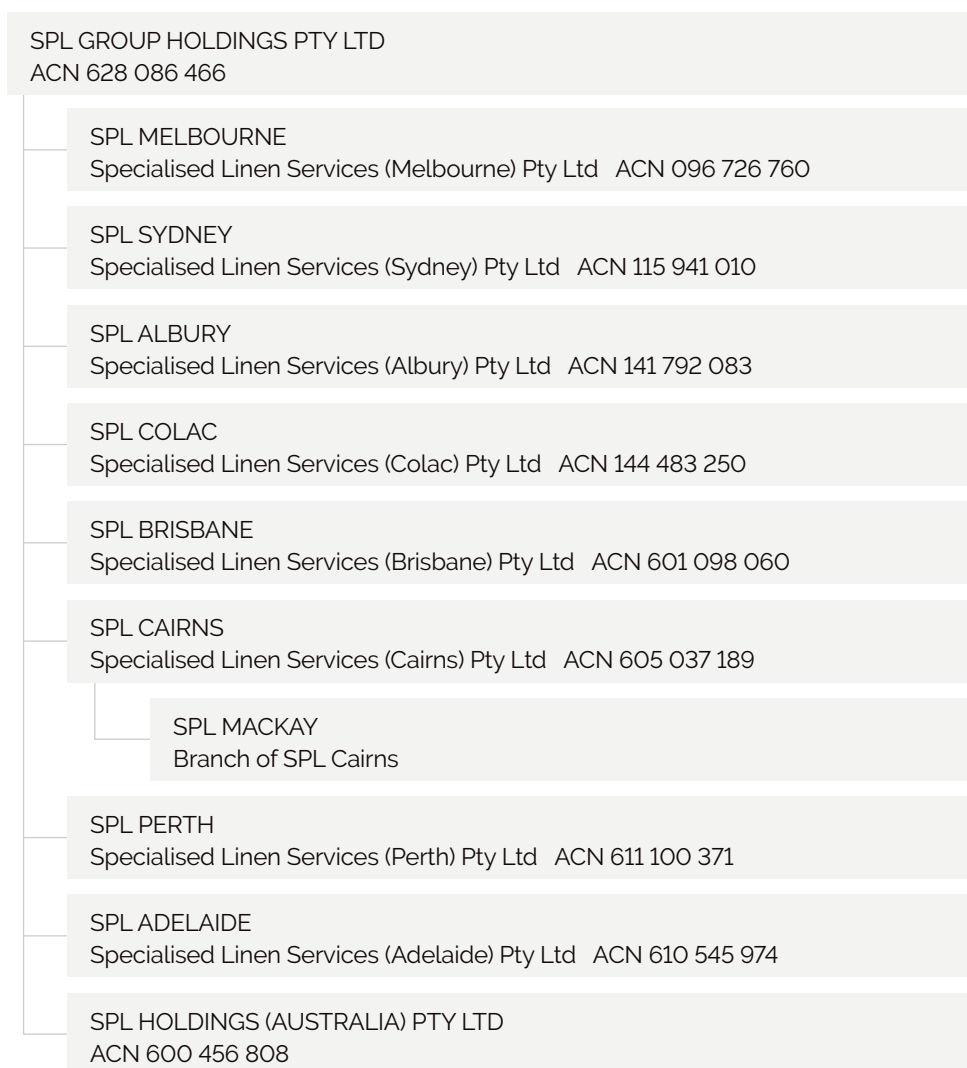
# ORGANISATION STRUCTURE

SPL's Board of Directors is tasked with setting the strategic direction, establishing management goals, and monitoring both their achievement and the overall performance of the business.

The Senior Management team oversees the day-to-day operations of the business on a national level, organised into six groups that cover a range of areas, including:

1. Sales & Marketing
2. Innovation & Capability
3. Operations
4. Health, Safety, Environment, and Quality (HSEQ)
5. People and Culture
6. Finance Services

The corporate structure of the SPL Group operating entities is shown below:



**OUR  
WORKFORCE**  
AS OF 30  
JUNE 2024:

**504**  
FEMALE

**529**  
MALE

**446**  
CASUAL

**36**  
PART TIME

**551**  
FULL TIME

# MANAGEMENT OF MODERN SLAVERY RISKS

Effective management of modern slavery risks involves implementing robust due diligence processes, fostering transparent supply chains, and ensuring compliance with ethical labour standards to protect vulnerable workers.

Key mitigating controls are in place to support the management of modern slavery risk, including SPL's Speak Up Policy, Human Rights and Social Responsibility Policy, Supplier Code of Conduct and Risk Management Policy.

## IDENTIFYING MODERN SLAVERY RISK IN OUR OPERATIONS AND SUPPLY CHAINS

SPL's Sustainability Committee was developed to take a stand in managing environmental, social and governance issues within our supply chain.

SPL's Sustainability Committee has identified modern slavery risk as a key social sustainability issue to understand and manage effectively. The committee comprises of National team members, focusing on sharing information, promoting consistency in policies and processes, and supporting strategic approaches in supply chain analysis.

The risk of modern slavery within our Australian operations and local procurement is assessed to be low. However, over the last twelve months we have focused on our local labour hire engagements and improvement of supplier management, as the use of labour hire companies and third-party service providers can reduce transparency of at-risk employment practices.

We continue to focus on international linen suppliers because they are often from high-risk countries, although our current supply chain indicates that we do not source from high-risk regions. We are committed to sourcing linen only from suppliers with robust governance systems to ensure compliance with modern slavery regulations, and we regularly review the effectiveness of these systems.

SPL recognises its direct relationships with first-tier suppliers, who may have their own relationships with second-tier suppliers. This is now managed through our Supplier Code of Conduct.

SPL have identified several risk factors which may expose our supply chain to the risk of modern slavery practices, including the following:

### COUNTRY

Some of the countries we source materials from are classified as being at higher risk of modern slavery practices due to country-specific weaknesses. These countries include Bangladesh, India and Pakistan, this is due to governance issues, the presence of people vulnerable to exploitation, lack of basic needs and inequality. Using the Walk Free Foundation's Global Slavery Index<sup>1</sup>, we have determined the above-mentioned countries to be a medium risk of modern slavery practices occurring.

### EMPLOYMENT ARRANGEMENTS

Employment conditions, such as temporary or uncertain employment arrangements or visa status, can make people more vulnerable to exploitation, especially for workers in higher risk countries when working in low-skilled roles. This can be intensified for people with limited education, local knowledge or language<sup>2</sup>.

### INDUSTRY

The sector or industry, either by itself or combined with an at-risk source country, contributes to modern slavery risk. Some of the industries from which we source materials or services, such as the textile and garment industries<sup>3</sup>, have been found to have modern slavery practices occurring within them.

### COMMODITIES

Specific products or commodities are at risk of modern slavery practices when sourced from high-risk countries. While we do not directly source commodity items, our suppliers may use them to manufacture the products which we buy from them.

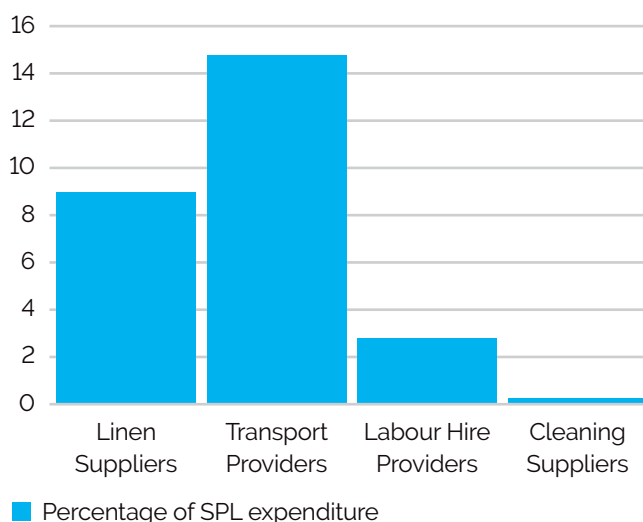
1. Walk Free Foundation (2018) The global slavery index 2018, Walk Free Foundation.
2. Gangmasters and Labour Abuse Authority (2023) Modern slavery, GLAA.
3. Office of Child Labor, Forced Labor, and Human Trafficking, Bureau of International Labor Affairs, United States Department of Labor (2024) List of goods produced by child labour or forced labour, United States Department of Labor.

In identifying risk factors and evaluating our risks, we have consulted sources such as the Walk Free Foundation, Department of Labor (US), Australian Government – Australian Institute of Criminology (AIC) and various other public media sources.

Taking these risk factors into consideration, we are progressively assessing the risk and implementing corrective actions and prioritising the areas of highest spend in our supply chain and operations where SPL activities may cause the modern slavery risk or contribute to the modern slavery risk, and where SPL has a high influence over the risk.

We have identified four areas of operational and supply chain spending in this statement which may have some exposure to modern slavery risks. Given the relative spend and location of third-party suppliers, linen suppliers and transport providers are our focus as these are the areas we can have most impact on reducing modern slavery risk.

PERCENTAGE OF SPL EXPENDITURE



The following tables show how we identify the risk of our suppliers, and the summarise the risk of our top spend suppliers.

RISK CATEGORY	TYPE OF SERVICE
Nil	<ul style="list-style-type: none"> <li>Federal or state government departments</li> <li>Small suppliers with annual invoice value below \$300k</li> <li>Companies providing one-off services e.g. equipment installation</li> </ul>
Low	<ul style="list-style-type: none"> <li>Australian companies providing in-direct services/utilities to SPL</li> <li>Companies supplying laundry equipment for one-off project work or general off-the-shelf products to SPL</li> <li>Companies (own or subcontractor) with overseas manufacturing facilities in areas with low prevalence and under 50% vulnerability according to the Global Slavery Index producing products for SPL</li> </ul>
Medium	<ul style="list-style-type: none"> <li>Companies with staff working at SPL sites or processing SPL products within Australia</li> <li>Companies (own or subcontractor) with overseas manufacturing facilities in areas with increased vulnerability according to the Global Slavery Index producing products for SPL</li> </ul>
High	<ul style="list-style-type: none"> <li>Companies (own or subcontractor) with overseas manufacturing facilities in areas of most prevalence and high vulnerability according to the Global Slavery Index producing products for SPL</li> </ul>

SUPPLIER	COUNTRY OF ORIGIN	CATEGORY (ie linen, machinery etc)	MODERN SLAVERY RISK LEVEL
A1 Labour Services	Australia	Labour Hire	Low
ASOS	Australia	Transport	Low
CDS	Australia	Transport	Low
Host Supplies	Pakistan	Linen	Medium
Host Supplies	China	Linen	Low
K&Y	Australia	Transport	Low
Pinnacle	Australia	Transport	Low
Simba	India	Linen	Medium
Simba	Bangladesh	Linen	Medium
Simba	China	Linen	Low

## OUR RESPONSIBILITIES

The SPL CFO and People and Culture Manager have delegated responsibility for managing modern slavery risks in our business and report directly to the SPL Board. The SPL Board of Directors approves the Modern Slavery Statement. The table below shows SPL's governance structure for assessing and managing these risks.



## ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

### SITE VISITS

SPL is committed to working lawfully and ethically with suppliers who share our values. We ensure our suppliers understand and meet our expectations to comply with all modern slavery laws. We do this through a risk-based approach, having identified suppliers who may fall within the higher-risk category particularly suppliers in Asia. During the financial year, where possible, we conduct site visits of several international factories to:

- Conduct audits.
- Further enhance working relationships.

### AUDITS

SPL has undertaken a thorough audit of our consistent labour hire provider and are committing to undertake audits on all labour hire providers in the next financial year. We have also taken steps to create a robust audit system for our transport providers, to commence in the next financial year.

### POLICIES

To ensure SPL's commitment to ethical practices, human rights, and social responsibility, we have a Human Rights and Social Responsibility Policy which outlines SPL's commitment to respecting and promotes human rights in accordance with the UN Guiding Principles. In addition to this, we have a Speak Up Policy to ensure our employees (current and former), and other stakeholders can report concerns about unethical behaviour, compliance issues, or any other misconduct without fear of retaliation.

With careful planning, ongoing support, and a commitment to creating a supportive and inclusive environment for young people, SPL have developed a Junior Engagement Policy ensuring compliance with legal requirements related to working with minors and maintaining ethical standards in all interactions with young people.

### ANNUAL SUPPLIER QUESTIONNAIRE

To ensure SPL's commitment that our business remains free from any form of exploitation or forced labour, we have reporting mechanisms in the form of an annual supplier questionnaire to assess modern slavery risks in our supply chain and address any concerns as needed.

## ASSESSING EFFECTIVENESS

### SPEAK UP POLICY AND HUMAN RIGHTS AND SOCIAL RESPONSIBILITY POLICY

We closely monitor potential modern slavery breaches, and these, if any, are reported to the SPL Board. As per our Speak Up Policy and Human Rights and Social Responsibility Policy, employees are trained to identify and report issues. Concerns are escalated to our People & Culture Manager, who works with Senior Managers and Operational teams to address the issue and prevent future occurrences.

### MODERN SLAVERY AWARENESS TRAINING AND EDUCATION

SPL promotes all business leaders to undergo modern slavery training. Additionally, employees across the Group receive training in safety, code of conduct, and wage compliance to address key modern slavery risks. This training is crucial for raising risk awareness and embedding best practices.

## SUMMARY

SPL is proud of the progress we've made in reducing the risk of modern slavery in our business, operations, and supply chain. We will continue to improve on our reporting and practices including updating internal policies, creating a robust audit system for our transport providers, and continuing employee training on modern slavery risks.

Addressing modern slavery in our supply chain is both challenging and requires significant time. We value transparency and see this as an ongoing journey where we will learn and improve. It's crucial to clearly communicate our requirements to our supply chain and align them with our procurement policies and practices.

We are dedicated to addressing identified risks and will collaborate with industry and experts to learn and share our experiences.

## CONSULTATION ACROSS OUR BUSINESS

The entities owned and controlled by SPL Holdings all operate under the direction and governance of the Board of SPL Holdings Pty Ltd and share the same executive management team.

In the process of preparing this statement, we have presented draft versions to our executive team and senior leadership teams to encourage discussion and invite feedback.

While the People and Culture function, in conjunction with the Procurement function, manage the systems, processes and tools that underpin our risk management approach and enable us to monitor effectiveness, the Board retains oversight of SPL's management of its modern slavery risks.

## STATEMENT AVAILABILITY

This statement has been approved by the principal governing body of SPL Holdings on 16 December 2024 and is signed by the CEO and Managing Director, Andrew Robson.



**Andrew Robson**  
CEO and Managing Director

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The controlled document is available on the Intranet.





# SPL

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