

# BIC Services 2021 Modern Slavery Statement



**BIC**

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# Contents

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CEO Foreword	3
How We Create Value	4
Modern Slavery Highlights	6
Our Structure, Operations and Supply Chain	7
The Impact of COVID-19	10
Identifying Our Modern Slavery Risks	12
Our Actions	14
Assessing Effectiveness	18
The Way Forward	19



## About this statement

This is our second Modern Slavery Statement (Statement) published for the purpose of reporting under the Australian Modern Slavery Act 2018 (Cth). It applies to and describes the steps taken by BIC Services during the financial year ending 30 June 2021 (FY21).

For completeness, where our approach to modern slavery, business structure, operations and supply chain have remained the same over the 2021 reporting period, we have re-stated the same information as per our 2020 Statement.

We have also included reference to initiatives undertaken in the prior reporting period for historical context and any notable progress achieved post FY21 and prior to publishing this Statement for currency.

We welcome your feedback and any queries you may have on our Modern Slavery Statement and Framework.

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## CEO Foreword

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As CEO of an industry-leading organisation, I see it as a personal responsibility to increase awareness of modern slavery risks across our business and industry and to work collaboratively across our value chain to develop appropriate strategies and plans to identify and combat it. There is a lot of diversity in what modern slavery looks like, and it needs to become clearer to everyone. We need to grow awareness that it does exist in Australia, not just in our overseas supply chain. How we uncover incidents of modern slavery and ensure no unintended victims from actions taken is still a major challenge.

While we are still learning and building our capability to deliver a best practice approach, BIC Services is proud to publish our second Modern Slavery Statement which was approved by the BIC Board on 24 December 2021. Our values, ethics and proactive engagement with our business partners, alongside the measures shared in this document are aimed at helping to reduce the risks of modern slavery throughout our supply chain, operations and the broader cleaning industry.

BIC Services strongly opposes any human rights violations, including slavery and human trafficking. As a large Australian owned and operated national cleaning service provider, and a signatory to the United Nation's Global Compact, we are committed to leading industry in the drive to eliminate modern slavery in all forms. We believe we have a significant opportunity to demonstrate and exemplify an ethical approach to cleaning. This supports the health and prosperity of our workers, our clients, their tenants, and the sustainability of our business.

We established our Modern Slavery Framework in 2018 to guide our actions and ensure a comprehensive approach across the business and published our first Modern Slavery Statement and Framework in March 2021. Since then we have reviewed our performance and continue to strengthen our approach, identifying areas in which we need to focus more effort, as well as recognising our achievements.

BIC has been actively involved with the Cleaning Accountability Framework (CAF) since its inception and have contributed to the growth and development of CAF since 2013. We were one of the first of only three contractors to be awarded CAF Contractor Prequalification and are currently undergoing our renewal audit. We also have three buildings we service that have been awarded CAF 3 Star Standard Certification.

Keeping the health and wellbeing of victims and potential victims of modern slavery must remain foremost in our mind, not just meeting legislative requirements of an Act with great intent. I look forward to progressing our approach and identifying meaningful measures of success.



**“Since our foundation in 1989, we have maintained an industry-leading and progressive mindset of continuous improvement in a sustainable business model. The health and wellbeing of people is paramount in every decision we make, and we are passionately committed to working with key stakeholders to drive change, above and beyond compliance across the industry.”**

A handwritten signature in black ink, appearing to read 'Tony Gorgovski'. The signature is stylized and cursive.

**Tony Gorgovski,**  
Chief Executive Officer

# How We Create Value

## OUR PURPOSE

Smart solutions for healthy communities

### WHO WE ARE

We provide a full range of cleaning solutions including, maintenance, hygiene and waste management services for commercial, industrial, education, aged-care, health and public places across Australia.

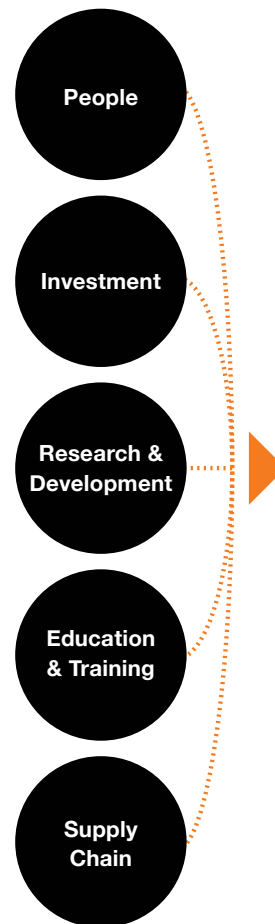
### VALUES

-  Safety
-  Respect
-  Customer focus
-  Team work
-  Honesty
-  Commitment to employees

### OUR MATERIAL ISSUES

-  Increasing customer satisfaction through innovative solutions
-  Protecting and promoting human rights in our business and industry
-  Engaging clients and tenants in improving sustainability outcomes
-  Managing uncertainty in our supply chain
-  Producing actionable insights through transparent reporting

### OUR INPUTS



## OUR STRATEGIES

### OUR PEOPLE

We look after our people and our people look after our clients



### INNOVATION

We invest in innovation to continually improve our service delivery



### SUSTAINABILITY

We partner with our clients to create sustainable ways of working



### TRANSPARENCY

We carry out all business operations with complete transparency



# IC PILLARS

## What this delivers

A safe, diverse and engaged workforce built on a direct employment model, fair payment and treatment, rigid health and safety standards, a standardised and consistent approach, the non-negotiable use of environmentally safe products and continuous education and training delivered through our Training Academy.



## What this delivers

A data-rich solution that uses sensors, tracking beacons, tablets, smart devices and mobile apps to monitor and report -- in real time -- workforce movement, service delivery and tenant requests and feedback.



## What this delivers

Mutually beneficial partnerships with our clients through customer-focused solutions for their cleaning requirements, investment in workforce training, positive relationships with tenants, and our data-driven technological innovations that improve efficiency, reduce environmental impacts and help them respond to sustainability disclosures.



## What this delivers

A trusted and reputable national brand based on carefully considered policies and processes, a well-audited supply chain, expertise in environmental management and transparent disclosure and reporting.



## OUTPUTS

Employ over  
**2,300**  
staff

Work over  
**500,000**  
shifts

Clean over  
**5 million**  
sqm of office  
space

Clean over  
**1,749**  
client sites  
at over 972  
locations

## OUR STAKEHOLDERS

  
Our people

  
Property owners, managers & tenants

  
Suppliers

  
Unions

  
Industry

  
Government

## OUR VALUE CHAIN

 Research & Development

 Suppliers

 Products & Packaging

 Marketing & Sales

 Property owners, managers & tenants

 Waste management



# Modern Slavery Highlights



\*These highlights include achievements up to and including FY21, the reporting year for this statement.

# Our Structure, Operations and Supply Chain

## ABOUT BIC SERVICES

BIC has been a leading provider of integrated cleaning services since 1989. We provide cleaning, hygiene and maintenance services, along with waste management and consumables across commercial, educational, industrial, aged care and health spaces, as well as precinct and open spaces. As an Australian-owned and operated business, and a

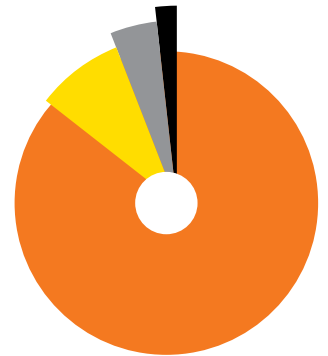
signatory to the United Nations Global Compact, we are intent on demonstrating how an ethical cleaning company delivers better results for workers, clients and the industry. We are a large and diverse employer of choice across all states and territories in Australia. Our clients also rely on our performance in relation to human rights to ensure their brand is protected. We acknowledge that we can contribute significantly to the fight against modern slavery.



**OVER \$121 MILLION ANNUAL REVENUE**

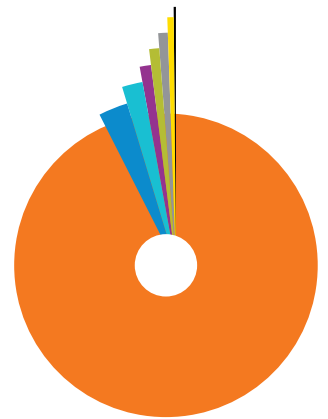
### FY21 REVENUE BY CLIENT SECTOR

- 86.67%** Commercial
- 7.60%** Financial institutions
- 4.14%** Education
- 1.59%** Government owned



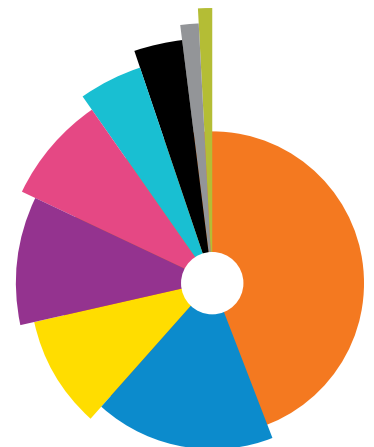
### FY21 REVENUE STREAMS

- 93.08%** General cleaning
- 2.54%** Waste Removal
- 1.71%** Toiletries
- 0.84%** Hygiene services
- 0.76%** Carpet cleaning
- 0.66%** Window cleaning
- 0.40%** Materials
- 0.01%** Pest Control



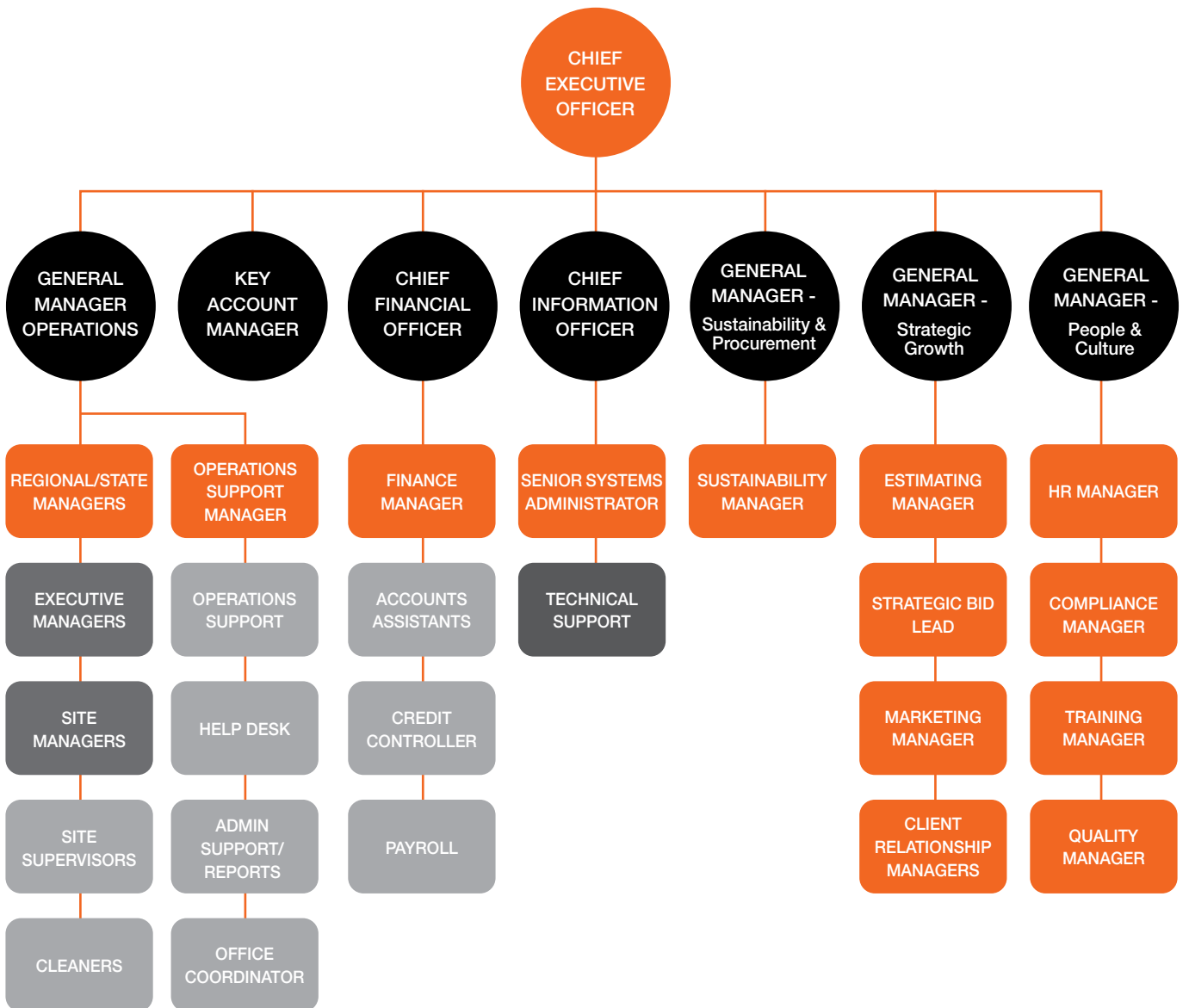
### FY21 PROCUREMENT CATEGORIES BY SPEND

- 46.37%** Chemicals and equipment
- 18.06%** Waste removal and recycling
- 9.56%** Information technology
- 9.31%** Hygiene
- 6.37%** High rise glass cleaning
- 4.61%** Legal, accounting and accreditation services
- 3.91%** Repairs and maintenance
- 1.03%** Uniforms
- 0.78%** Other



# Organisational Structure

With over 1,749 client sites across Australia, BIC have developed a corporate structure that reflects management at a national, state, regional and site level to ensure the quality and continuity of service to our partners.





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## Our Supply Chain

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In 2019, BIC completed an in-depth investigation into our supply chain and consequently introduced a supplier management portal with prequalifications, service agreements and corresponding KPIs to clarify our expectations and assist with transparency. We used the review to make some necessary adjustments to our procurement processes and spend, consolidating our supplier base and shifting spend away from high-risk countries to Australian and Indigenous suppliers.

BIC uses a range of suppliers for the provision of cleaning supplies, uniforms and specialists in the areas of high-rise window cleaning, hygiene and waste removal. Following the consolidation process, we spread our FY20 spend of about \$10.4 million across 37 suppliers. In FY21 this increased to 44 suppliers for a spend of about \$8.4 million. Our ten largest continue to account for about 70 percent of our spend, giving us a small number of high-quality relationships to prioritise our attention in the first instance.

**The five largest of our high-risk suppliers (by spend) include Bunzl, which is headquartered in the UK and produces annual modern slavery and human trafficking statements under the UK Modern Slavery Act. The remaining four are Australian-based companies, all operating primarily or exclusively within Australia.**

We have continued our supplier prequalification process with only three suppliers requiring follow up due to incomplete responses to our initial supplier modern slavery survey. Of our surveyed respondents, 94 percent are businesses whose annual revenue is less than the Australian Modern Slavery Act (Cth) reporting threshold of \$100 million, and 79 percent have annual revenue less than \$50 million. While not required to produce a statement, 54 percent advised they intend to produce a voluntary statement and 42 percent indicated they have started taking action to increase visibility and transparency of their supply chain.

We are committed to improving our supply chain monitoring and assessment processes and beyond tier one. Most recently we upgraded our Cm3 licence to leverage its modern slavery module and online survey. This move will eliminate some of the reporting burden on our supply chain as they can respond to the module and survey once and make it accessible to multiple clients via Cm3. It will more effectively help us capture modern slavery insights alongside broader aspects of our suppliers' governance practices, including health and safety and environmental considerations via the one platform.





## The Impact of Covid-19

**The last two years have been a rollercoaster ride due to the coronavirus (COVID-19) global pandemic. While the pandemic established cleaners as frontline workers, and cleaning an essential service, multiple lockdowns and increased working from home put added pressure on the industry to be able to look after its workers' job security and health and wellbeing; and to be able to maintain essential supplies and services that we were all reliant on. It was evident that a flow-on effect could be the heightened risk of modern slavery for workers, in our industry and in our supply chain.**

As we have a direct employment model and only operate in Australia, we have solid controls in place to ensure our people are not at increased risk of modern slavery due to the pandemic.

While most of our tier one suppliers are Australian based, we are not blind to the fact that some would be reliant on lower tier supply chains with some in countries that are at high risk of modern slavery and that the pandemic would place additional stresses on the overseas workforces and related supply chain logistics.

We met with several of our suppliers who import items from overseas to discuss the effects experienced due to COVID-19 and steps to put in place to remedy issues faced. One of the biggest issues was logistics. There are just as many freight companies as prior to the pandemic but they are all making less trips, which saw increases not only in cost but delivery times. We remedied this by ordering in larger quantities but putting in place longer lead times on orders of six months in advance rather than two months, so as not to add pressure down the supply chain. We did have to add a few more suppliers to spread the risk as well.

We made a conscious decision to be ahead of the curve in our response, beginning with informing and preparing our people, and we worked closely with our clients and suppliers to ensure we supported and informed them as well of any

required changes to operations. As an enhancement of our normal operations, we implemented 'refresher' and high touch point cleans for our clients during the day. Our cleaners being visible on site during the day provided reassurance to our clients and their tenants and visitors that we were there to look after their health and safety. Our GM - People & Culture wrote the first pandemic cleaning scope in Australia, and we tailored site-specific return to work programs for our clients to ensure their tenants felt secure when reoccupying their buildings.

### WE SET UP A PANDEMIC ACTION COMMITTEE

Who continue to meet weekly to stay agile and responsive to the rapidly changing realities we all face. Being a national company, we had the complex challenges of the lack of harmony between states around rules and restrictions, compounded with increased confusion as specific local government areas became hotspots. We faced the real impacts of our workers confronting heavy restrictions of movement just to get to work. We stuck to best practice and staying ahead of government policy. Keeping our people safe and delivering the highest level of service to our clients being paramount.

We embraced the national immunisation effort with our own very successful voluntary employee COVID-19 vaccination incentive program. At the time of writing this, our staff have achieved 100% double vaccination rate in NSW and VIC and 98% double vaccination across the entire country. This demonstrates how business can get things done despite the politics. It also shows how strong our company culture is, that we were able to engage our entire workforce in this way.

Appreciating the mental health implications of the pandemic, we ran an engagement campaign to reinforce how much we value our people and are there to support them, including availability and details of our employee assistance program.

We continue to assess the products and services we provide to ensure we are progressive and effective in the cleaning and sanitising of our and our clients' assets while adhering to our Green Cleaning Policy and Plan to minimise chemical use and environmental impacts wherever possible without compromising results. We use Nanocyn®, a hospital-grade, non-toxic, Good Environmental Choice Australia certified disinfectant and sanitiser, as a safe and effective hygiene solution. It has been entered into the Therapeutic Goods Administration's Australian Register of Therapeutic Goods and is proven to kill bacteria and viruses including Norovirus (Gastro), Influenza, Fungi and Mould by up to 99.9999% (6-log reduction) in 30 seconds and SARS-CoV-2 (coronavirus) in only 15 seconds.

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# The Impact of Covid-19

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Caring for our people has been foremost in our minds and where we have the greatest level of control, including safeguarding against any increase in modern slavery risks as a result of COVID-19. Our actions below included a number of initiatives subsequently recommended as best-practice in the [Australian Border Force guidance](#):

- An increased focus on training to ensure staff are equipped to handle the pandemic. Through the BIC Training Academy, we rolled out training courses including a training video specifically for pandemic cleaning.
- Improved levels of personal protection equipment (PPE), including complimentary personal-use reusable masks for every employee, given the heightened risk our employees faced as frontline workers.
- Maintaining employment for our employees through the negotiations we undertook with the unions to relax the minimum engagement of a four-hour shift, so that employees could job share and retain vital income.

COVID-19 has not materially changed our risk profile nor slowed down our due diligence and preventive efforts in identifying and mitigating our modern slavery risks.

We remain actively engaged with our suppliers on modern slavery safeguards and continue to implement our broad Modern Slavery Framework and pursue the actions within it, as detailed elsewhere within this statement.





## Identifying Our Modern Slavery Risks

**The cleaning industry was classified as 'high risk' for incidents of modern slavery by the Department of Home Affairs. Withholding of wages, immigration-related coercion and threats, deceptive recruitment, excessive overtime, debt bondage, confiscation of personal and travel documents, and dangerous and substandard working conditions are practices that have been found in the cleaning industry in Australia.**

Subcontracting, employment of migrant workers, as well as the high volume, time-pressured and often base-skilled nature of the work itself increases the risks. BIC takes these risks seriously and we have deployed safeguards in our operations and our supply chain. The Executive Board has oversight of managing the risks by monitoring compliance in our human resources and supply chain.

### IN OUR OPERATIONS

[Two inquiries conducted by the Fair Work Ombudsman](#) identified modern slavery risks in the cleaning industry as including breach of workplace laws, fraudulent subcontracting arrangements, below-minimum cash wage payments and poor job security. These inquiries and others led to the establishment of the Cleaning Accountability Framework (CAF), of which BIC has been actively involved since its inception.

Both through CAF and our own independent efforts, BIC stands firmly against the risk that the cleaning industry becomes a 'race to the bottom', with all the human rights and modern slavery risks that introduces.

Despite the risks in the broader industry, we have identified the residual risk of modern slavery in our operations as low. This is due partly to the robust safeguards we have implemented and partly to the decisions we have made about the structure and nature of our business. Our points of difference begin with our business model. We favour a direct employment approach, rather than subcontracting cleaning work. This provides us with unobstructed oversight of our cleaning teams and gives our workers access to our internal

safeguards against unfair work practices. Our supervisory network (consisting of our CEO, GM – Operations, Regional Managers, Executive Managers and Cleaning Supervisors) is committed to delivering multiple levels of support and ongoing monitoring of our on-site personnel.

All our direct workforce is in Australia and have Australian work rights with visas vetted by the Department of Immigration. This ensures compliance with current legislation and best practice to safeguard the interests of employees, prospective employees and others working with BIC. At induction, all new staff are issued with comprehensive information covering BIC's ethical and human rights policies, Fairwork Ombudsman Information, National Employment Standards, Visa Holders and Migrant Workers workplace rights and entitlements, to name a few.

BIC has long been an industry leader in driving change across the cleaning industry to help provide fair and equitable incomes to our cleaners. We employ the CAF Pricing Schedule to support transparency and accountability in cleaning contracts, a tool aimed at driving sustainable and ethical contract pricing in the cleaning industry.

### IN OUR SUPPLY CHAIN

BIC uses a select range of suppliers for the provision of cleaning chemicals, equipment, uniforms, and specialists in the areas of high-rise window cleaning, hygiene, and waste removal. Some of these sectors – such as uniforms – are widely recognised as being high-risk because materials are typically sourced, and products manufactured, globally.

As mentioned earlier, to identify the risks of modern slavery in our supply chain, we conducted an in-depth review in 2019 of our Tier 1 suppliers. After some consolidation, the risk of modern slavery is low in our Tier 1 suppliers. We reduced the number of our suppliers from 57 to 37 and shifted from contractors in high-risk countries to Australian and Indigenous suppliers. The screening process favoured operators whose modern slavery and human rights policies were aligned with our own. Our number of suppliers has increased to 44 in FY21.

We acknowledge that our lower tier suppliers are harder to monitor. We seek to improve our processes around identifying multi-tier supply chain risks, work that will include requiring Tier 1 to demonstrate how these risks are being identified and managed. Some of our suppliers are already highly active in assessing and setting safeguards for their own supply chains (our lower-tier suppliers), which BIC recognises as part of our selection process when we tender our work. See page 13 for Bunzl and page 17 for RWW Group examples.

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## Identifying Our Modern Slavery Risks

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We have engaged our current suppliers specifically on modern slavery through our Cm3 supplier portal, receiving information and confirmation of their compliance with our Modern Slavery Framework (MSF) and Human Rights Policy and have them complete a modern slavery survey to understand their awareness and response to modern slavery risks in their operations and supply chain.

We are committed to improving our supply chain monitoring and assessment processes and beyond tier one. Most recently we upgraded our Cm3 licence to leverage its modern slavery module and online survey. This move will eliminate some of the reporting burden on our supply chain as they can respond to the module and survey once and make it accessible to multiple clients via Cm3. It will more effectively help us capture modern slavery insights alongside broader aspects of our suppliers' governance practices, including health and safety and environmental considerations via the

one platform. In FY22 we will roll out our new Cm3 modern slavery and human rights supplier module and online survey to improve our oversight and analysis of supply chain risks.

We will also follow up on insights gained from our initial survey which highlighted 94 percent are businesses whose annual revenue is less than the Australian Modern Slavery Act (Cth) reporting threshold of \$100 million, and 79 percent have annual revenue less \$50 million. While not required to produce a statement, 54 percent advised they intend to produce a voluntary statement and 42 percent indicated they have started taking action to increase visibility and transparency of their supply chain.

There is opportunity to grow our engagement with suppliers on modern slavery to build their awareness and capability and also continue to learn from those that are mature in their approach.

### CASE STUDY: AN AUDIT OF OUR LARGEST SUPPLIER

On paper, our largest supplier of cleaning products, Bunzl, is classified as high risk, given the number – over 60 – and geographical profile of the materials and products they source. On that basis, we undertook an audit of Bunzl in 2019 and continue to engage with them on their approach to managing risks in their supply chain.

Our audit showed that Bunzl's efforts to identify and mitigate their modern slavery risks were very advanced. While they have adopted a zero tolerance to any form of modern slavery they work with their suppliers to help prevent social risk issues arising in the first place as well as addressing any found through their audit programme.

Bunzl has policies and procedures in place, including a Code of Conduct. All of these are aligned with the UN Universal Declaration of Human rights, local legislative requirements and the UK and Australian Modern Slavery Act.

Bunzl monitors its supply chain and conducts regular supplier audits focused on their sourcing from Asia. The audits, of which there are approximately 700 conducted each year, cover 12 Asian countries and 98 percent of their Asian spend, and include factory tours and interviews with factory workers. Bunzl's audit program is sufficiently extensive that the company provides audit training for all their supplier factories. Unfortunately, due to COVID-19 and travel related restrictions, they had to scale down training events in 2020. Their support of suppliers to help them resolve issues identified has continued, but most of the interactions have had to be conducted remotely.

As a large company with headquarters in London, Bunzl has issued multiple modern slavery and human trafficking statements under the UK's Modern Slavery Act.





## Our Actions

Modern slavery requires a comprehensive, all-of-business response. We have established appropriate governance arrangements to give effect to our MSF, to implement and improve safeguards across all aspects of the business.

While we have not identified any instances of modern slavery to date, we know there could still be unidentified instances. Our priority is to safeguard the rights and wellbeing of any person who is a suspected victim of modern slavery and those that may lodge a concern in good faith.

### OUR GOVERNANCE OF MODERN SLAVERY

#### MODERN SLAVERY STEERING COMMITTEE AND FRAMEWORK

In November 2019, in recognition of the need for an all-of-business response to the problem, we established a Modern Slavery Steering Committee to review, evaluate and measure compliance and drive improvements in our operating procedures and along our supply chain. The committee is made up of members of the leadership team, including our CEO, GM – Sustainability and Procurement, GM – People & Culture, HR Manager, Training & Compliance Manager and GM – Operations. The committee is responsible for reviewing and revising our MSF where necessary. This includes analysing the effectiveness of the current framework, and incorporating the lessons, challenges and achievements from the previous year.

After reviewing our 2020 Modern Slavery Statement and Framework and work to date, we have included modern slavery risks on our risk register and determined the following areas for improvement:

- Mature our approach to supply chain risk assessments for ongoing identification of risks in our supply chain beyond tier one.
- Grow collaboration with suppliers post self-assessments to determine if they are actively progressing their own response in areas of concern, how we may assist them and to share learnings and experiences.
- Expand our grievance mechanisms to include a third-party channel for any stakeholder, including suppliers, that may want to raise a concern anonymously and not directly with BIC.

- Refine our employee and supplier training on modern slavery and human rights to include measures that our position and direction on actions to take is understood, and employees feel confident in knowing what to look for and steps they can take if they have a concern.
- Establish KPIs to track our performance on modern slavery risk assessment and compliance to relevant policies.
- Develop a measurement and evaluation framework to determine the effectiveness and long-term impact of our modern slavery response.

### IN OUR INDUSTRY

#### CLEANING ACCOUNTABILITY FRAMEWORK (CAF)

[CAF](#) is a multi-stakeholder voluntary partnership established to improve cleaning and labour standards in the cleaning industry. It is closely aligned with the new modern slavery legislation and has partnered with the [Commonwealth Government of Australia](#)<sup>1</sup>, providing insights and expertise to further assess modern slavery risks in cleaning services procured by property service providers.

CAF's overarching objective is to end exploitation of cleaners. As the first cleaning contractor of the CAF Steering Committee, BIC has established a strong relationship with CAF and is passionately committed to driving change across the industry.

Specifically, the objectives of CAF and BIC are to:

- Develop a new standard for cleaning services in the property services industry which balances quality cleaning services and fair working conditions with value for money.
- Develop a method to assess the performance of cleaning contractors and building owners/managers in order to drive compliance and create confidence that the new standards are being implemented.

CAF is an attempt by these organisations to move beyond a reliance on contractual and legal obligations in the supply chain, to one that is focused on improving transparency in decision making, capacity building and enhancing monitoring and reporting of cleaning and labour standards performance.

1. See page 26 - [commonwealth-modern-slavery-statement-20-21.pdf](#) ([homeaffairs.gov.au](#))

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# Our Actions

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## EARNING CAF CONTRACTOR PREQUALIFICATION

The process of CAF Prequalification involves an assessment of the adequacy of a cleaning contractor's management and HR systems to facilitate compliance with the CAF 3 Star Standard. By receiving a CAF Contractor Prequalification status, we have proven the readiness of our business policies, practices, and systems to assure our workers' rights and safeguard against the risk of labour and human rights abuses. We have demonstrated that our company has:

- Adequate management systems in place to provide correct wages and conditions and superannuation, including appropriate record keeping systems
- Processes to educate cleaners about their workplace rights and conditions of employment
- Policies, procedures and systems in place to provide cleaners with paid and unpaid leave entitlements
- Systems to verify and monitor visa holders' right to work in Australia
- Financial viability
- Adequate WHS systems, policies and procedures to provide cleaners with a safe work environment
- Mechanisms in place to reduce the risk of worker exploitation, such as sham contracting, underpayment, modern slavery, etc.
- Considered ways in which we can provide cleaners with job security at a change of contract.

BIC is committed to maintaining its prequalification status and to continue to educate its clients, employees and supply chain on the benefits of continuous improvement in labour standards.

## OUR POLICIES & POLICY REVIEW

### OUR POLICIES

BIC has a strong set of policies to support human rights in its own business and supply chain in accordance with the International Bill of Human Rights and as a Signatory to the United Nations Global Compact (UNGC), we are committed to implementing its Ten Principles on human rights, labour, environment and anti-corruption. We require direct suppliers to comply with all applicable laws and regulations and with our [Human Rights Policy](#), Modern Slavery Framework and Code of Conduct. Suppliers are expected to maintain fundamental human rights standards and adopt similar policies in their own businesses. Our Human Rights Policy also sets out requirements and expectations of our employees.

The policy notes that BIC is strongly opposed to all human rights violations and prohibits the use of forced labour or modern forms of slavery. It prohibits the hiring of individuals that are under 18 years of age for positions in which hazardous work is required and notes that BIC will not knowingly do business with suppliers that illegally or improperly employ underage workers.

Our Code of Conduct defines how BIC employees should act on a day-to-day basis, reflecting the company's daily operations, core values and overall company culture. The code also outlines our expectations regarding employees' standards of behaviour when interacting with clients, colleagues, and the company. It begins with compliance with the law, explicitly including employment laws. It also emphasises the importance of following BIC's expressed core values, one of which is our Commitment to Employees, whereby BIC strives to achieve a harmonious workplace and higher incomes for our employees.



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# Our Actions

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## POLICY REVIEW

In preparation for meeting our reporting obligations for the Modern Slavery Act, BIC conducted a review of all policies and procedures in 2020 to ensure that these were consistent and effective in responding to the Act. A further review in 2021 including a client audit of our modern slavery response, saw recommendations for additional minor revisions which have been made. We are strengthening and improving our operational practices to enable us to identify vulnerable people more readily in our business. These are subject to ongoing reviews during our monthly executive team meetings. We are also improving our systems through our certified Integrated Management System to ensure the principles of BIC's Human Rights Policy are faithfully enacted across the business. In 2021 this also saw modern slavery risks being added to our risk register.

## TRAINING & AWARENESS RAISING

### MODERN SLAVERY TRAINING FOR OUR LEADERSHIP

All of our existing managers have completed the [Anti-Slavery Australia Modern Slavery eLearning](#) course, a comprehensive program which covers all forms of slavery and human trafficking, including international conventions, Australian legislation and specific content on trafficking, slavery, servitude, forced labour, forced marriage, debt bondage, child labour and organ trafficking. This training is a standard part of induction for all new management staff.

We also participated in the Global Compact Network of Australia's 2021 Australian Dialogue on Business and Human Rights spotlight series. This included representatives from business, civil society and government discussing how we can work collectively to navigate a new path that embeds respect for people and the planet.

### BIC TRAINING ACADEMY

BIC has developed its own Training Academy of Excellence to induct, train and continually educate our employees. The Academy is an industry-first and an innovative solution to ensuring best-in-class training for our cleaning teams. Modern slavery is now a core component of the training our employees receive. Among other aspects, the Academy helps raise awareness for detecting and preventing human trafficking by training employees in modern slavery risk indicators.

**There is still work to do to ensure our position and direction on actions to take is clearly understood; and employees feel confident in knowing what to look for and steps they can take if they have a concern.**

## MODERN SLAVERY AWARENESS RAISING AND COMMUNICATIONS

As part of our responsibility to combat modern slavery we ensure that employees, clients, partners and other stakeholders are aware of our commitments. We do this through all available channels, including our newsletters, blog and LinkedIn, as well as our CEO updates, trade show presentations and InClean magazine articles. Our intention is simple: to send a clear message that BIC will not tolerate any form of exploitation in our business or supply chain, nor the wider industry.

In 2021 we have had one-to-one engagements with several clients to share responses and key learnings from experiences to date. We welcomed an audit by one of our key clients and are currently awaiting their consultant's report and recommendations.

### THE BIC SCHOLARSHIP PROGRAM

In 2020, we introduced our BIC Scholarship Program to ensure ongoing and committed investment in our people. The BIC Scholarship Program is awarded annually and designed to provide financial support to employees and to some of the most vulnerable people in our community to further their studies in Australia. In 2021, we also established an education partnership with Pymble Ladies College, which will see BIC provide scholarships to support Aboriginal and Torres Strait Islander youth, from kindergarten through to matriculation, including full board.

For more information go to LinkedIn:

[Article 1 - BIC are proud to announce The BIC Scholarship Program](#)

[Article 2 - This year's John Balbi Scholarship.](#)

## OUR SUPPLY CHAIN

### PROCUREMENT REVIEW, INCLUDING SUPPLIER AGREEMENTS, KPIS & SUPPLIER COMPLIANCE PORTAL

A review of our supply chain in 2019 led us to consolidate our supplier base, shift from high-risk countries to Australian and Indigenous suppliers where possible and reduce the number of our suppliers from 57 to 37, now 44 as of FY21. We introduced and continue to use a Cm3 supplier management portal with prequalifications, service agreements and corresponding KPIS, and supplier audits to ensure transparency and consistency throughout the chain.

BIC aims to source goods and services efficiently and fairly, engaging suppliers who share BIC's beliefs in responsible supply chain management and core values. We ensure due diligence is undertaken before entering into any supplier relationship and in-line with BIC's rules of engagement for suppliers. When looking at engaging a supplier, we ensure they are reputable and Cm3 pre-qualified as a minimum.

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## Our Actions

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Suppliers are expected to maintain fundamental labour and human rights standards and comply with all applicable laws and regulations of the jurisdictions in which the suppliers are doing business, including employment laws, maintain just and decent working conditions, share BIC's respect for the environment and implement sound security measures. In 2020, BIC completed a register of approved suppliers using the Cm3 platform. Suppliers were required to complete and upload BIC's Modern Slavery Survey into Cm3. We have continued our supplier prequalification process with only three suppliers requiring follow up due to incomplete responses to our initial supplier modern slavery survey. Of our surveyed respondents, 94 percent are businesses whose annual revenue is less than the Australian Modern Slavery Act (Cth) reporting threshold of \$100 million, and 79 percent have annual revenue less \$50 million.

**While not required to produce a statement, 54 percent advised they intend to produce a voluntary statement and 42 percent indicated they have started taking action to increase visibility and transparency of their supply chain.**

We are committed to improving our supply chain monitoring and assessment processes and beyond tier one. In 2021 we engaged with our uniform supplier, RWW Group, to better understand the rigor of their supply chain management processes. It was reassuring to see their process in detail and examples of third party audit reports on overseas factories. These audit reports provide evidence on key ethical and sustainable operations including living conditions, child labour and working hours. Reports are requested from the factories every 12 months and subsequent audits by RWW's own audit partners are used, when they feel further assurance is required of a suppliers practices.

We recently upgraded our Cm3 licence to leverage its modern slavery module and online survey. This move will eliminate some of the reporting burden on our supply chain as they can respond to the module and survey once and make it accessible to multiple clients via Cm3. It will more effectively help us capture modern slavery insights alongside broader aspects of our suppliers' governance practices, including health and safety and environmental considerations via the one platform and assist us in prioritising and focusing our ongoing engagement with suppliers. In the case of identified breaches of BIC's Human Rights Policy, suppliers will be required to exercise remedial actions. Where necessary, depending on the severity of the breach, BIC will establish corrective action plans to support suppliers in developing their capabilities and improving their practices.

BIC is committed to working in partnership with its suppliers to build awareness and strengthen their response to modern slavery risks. In the event a supplier is unwilling or unable to demonstrate continuous improvement and remediation measures if required, the trading agreement between BIC and the supplier will be terminated.

### **WHISTLEBLOWING PROTECTION, REMEDIATION & VICTIM SUPPORT**

BIC has established a Whistleblowing Policy to encourage and protect those reporting possible human rights or modern slavery abuses within the business. We are committed to working closely with law enforcement to respond to any reported modern slavery instances, though to date this has not been required. We are also committed to providing ongoing assistance and support for any victims of modern slavery relating to our business.





## Assessing Effectiveness

Many of the steps initially identified in our Modern Slavery Framework (MSF) have been successfully implemented. These include establishing our Modern Slavery Steering Committee, achieving CAF contractor prequalification status, conducting a procurement investigation and robust tendering process, and conducting a review of all policies relevant to modern slavery.

In assessing the effectiveness of our approach to modern slavery, the following performance indicators will be used. Where possible, we have included our performance against these indicators to date.

Action	Performance Indicator	Our performance to date
Modern Slavery Steering Committee	<ul style="list-style-type: none"> <li>Meeting frequency</li> <li>MSF reviewed annually</li> </ul>	Moved to quarterly meetings in FY21 Annual review of MSF
CAF Contractor Prequalification	<ul style="list-style-type: none"> <li>Annual recertification</li> </ul>	Last renewed February 2021
Suppliers	<ul style="list-style-type: none"> <li>Percentage (%) of suppliers accepted to BIC's register of approved suppliers, including conformance with BIC's human rights policy and Cm3 prequalification</li> </ul>	100%
Supplier breaches	<ul style="list-style-type: none"> <li>Number of identified breaches of BIC's Human Rights Policy and supplier expectations</li> <li>Number of corrective action plans agreed (and progress)</li> </ul>	0 0
Training	<ul style="list-style-type: none"> <li>Percentage (%) of BIC's management team trained to recognise and safeguard against modern slavery risks</li> <li>Percentage (%) of BIC's workforce trained to recognise and safeguard against modern slavery risks</li> </ul>	100% 100%
Modern slavery instances	<ul style="list-style-type: none"> <li>Instances detected</li> <li>Instances remedied (and how)</li> </ul>	0 0





## The Way Forward

Our Modern Slavery Framework (MSF) was developed to ensure a consistent all-of-business response to the risk of modern slavery within our business and industry. A crucial action was establishing BIC's Modern Slavery Steering Committee, to provide ongoing oversight of our efforts. The MSF is subject to review by the Steering Committee, to ensure it remains fit for purpose in an evolving business and regulatory environment.

Our MSF is detailed in full below. Most of the actions set out here have been enacted, however they will undergo periodic review.

### BIC Services Modern Slavery Response Framework

Aspect	Deliverable	Responsibility	Status
<b>Establish robust governance of modern slavery response</b>	Cross-functional Modern Slavery Steering Committee established and meet regularly to lead implementation, monitor and review progress against framework.	CEO	
	Signatory to the United Nations Global Compact and support the Ten Principles on human rights, labour, environment and anti-corruption.	CEO	
	Human rights policy developed and reference to human rights integrated into related policies and codes of conduct.  All policies and codes of conduct to be reviewed bi-annually or more often as required.	GM – People & Culture	Last reviewed June 2021.  
	Incorporate modern slavery risks on our risk register.	Quality Assurance Manager	Incorporated in 2021.  
	Maintain register of approved suppliers through Cm3 platform to ensure high risk suppliers are prequalified in ethical, health and safety and environmental standards, have read and commit to BIC Human Rights policy and expectations and completed our supplier modern slavery prequalification survey.	GM – Sustainability & Procurement	Upgrading Cm3 platform to include modern slavery module and online survey.  

#### Status key:








Operationalised

In progress

Ongoing

Planned

# The Way Forward

Aspect	Deliverable	Responsibility	Status
	<p>Maintain a robust procurement process to ensure due diligence is undertaken before entering into any supplier relationship and with ongoing review of supplier modern slavery responses.</p> <p>Suppliers to provide rectification actions of any breaches. Depending on the severity of the breach, where possible, BIC to establish corrective action plans to support suppliers in developing their capabilities and improving their performance. Termination of supplier relationship will occur when a supplier refuses or fails to implement rectification measures.</p>	GM – Sustainability & Procurement	<p>Plan to formalise a more rigorous process for supplier risk assessment and ongoing auditing and engagement in FY22.</p> <p>One supplier relationship was terminated in 2020 as they were unable to meet BIC requirements on transparency of their overseas supply chain.</p> 
	Develop and implement a strategic plan to engage and ensure employees understand their roles and responsibilities in combating modern slavery, from frontline cleaners to senior management across our operations.	GM – People & Culture	<p>To be developed in 2022.</p> 
	Maintain Cleaning Accountability Framework (CAF) contractor prequalification and site certifications.	GM – People & Culture	<p>Contractor prequalification certification renewed February 2021.</p> 
	Develop a measurement and evaluation process to determine the effectiveness and long-term impact of our modern slavery response.	GM – Sustainability & Procurement	<p>While we have metrics in place to monitor performance, we are yet to develop an effective measure of impacts from our response.</p> 
	Publish an annual Modern Slavery Statement (Statement) for the purpose of reporting under the Australian Modern Slavery Act 2018 (Cth).	GM – Sustainability & Procurement	<p>This is our second annual Modern Slavery Statement.</p> 
<b>Internal and external engagement to grow awareness, build capability and strengthen response</b>	Continue representation on CAF Steering Committee and engagement with multi-stakeholder partnerships to continuously improve cleaning and labour standards in the industry.	GM – People & Culture	<p>GM – People &amp; Culture has continued involvement in the CAF Steering Committee and related engagements.</p> 
	Engage with other like-minded organisations including clients, suppliers, government and civil society representatives to grow our understanding, raise awareness and identify solutions to mitigate and remediate modern slavery risks across our value chain.	CEO, GM – People & Culture, GM – Sustainability & Procurement, GM – Operations	<p>Commenced engagement with Global Compact Network and ongoing engagement with clients &amp; suppliers in 2021. Identify broader stakeholder engagement opportunities in 2022.</p> 

# The Way Forward

Aspect	Deliverable	Responsibility	Status
	Training and capability building of our people via multiple channels including employee induction program, Anti-Slavery Australia Modern Slavery in Australia eLearning course module for managers, BIC Training Academy and Toolbox Talks for cleaning teams, newsletters, blog and social media.	GM – People & Culture	New and improved BIC online learning module to be developed in 2022 to include measures of effectiveness that our position and direction on actions to take is understood; and employees feel confident in knowing what to look for and steps they can take if they have a concern. 
	Promote our commitments via face-to-face engagement with key stakeholders, publication of our annual Modern Slavery Statement, UNGC Communication on Progress, sustainability report and other communication activities via professional media, client newsletters, BIC website, blog, and social media.	Marketing Manager	
<b>Grievance and remediation</b>	Implement an effective operational-level grievance mechanism to identify and remediate modern slavery in business operations and supply chains.  BIC management take all reasonable steps to protect anyone from reprisals for making a disclosure and afford natural justice to people who are the subject of the disclosures.	GM – People & Culture, GM – Sustainability & Procurement	For employees we have a dispute resolution policy which explains the procedures for resolution of disputes and grievances.  Our whistleblowing channel is communicated in our human rights policy for suppliers and employees alike.   We are yet to establish a third-party anonymous channel. For review in 2022.
	Work closely with law enforcement to respond to reported modern slavery crimes.	GM – People & Culture, GM – Sustainability & Procurement, GM – Operations.	This has not been necessary to date as no instances related to our business have been reported. 
	Provide ongoing assistance and support to victims of modern slavery e.g. via employee assistance programs, financial support, mentoring and workplace support.	GM – People & Culture, GM – Sustainability & Procurement, GM – Operations.	This has not been necessary to date as no instances related to our business have been reported. 
	Work closely with government and civil society organisations to ensure victims receive the support and help they need.	GM – People & Culture, GM – Sustainability & Procurement	This has not been necessary to date as no instances related to our business have been reported. 

