



Modern Slavery Statement

2023 - 2024

Better than you expect



Introduction

As part of our commitment to ethical and responsible business practices, Tradeflex is proud to present our inaugural Modern Slavery Statement in accordance with the Australian Modern Slavery Act 2018 (Cth).

Our Statement outlines the measures we have taken throughout the financial year ending on 30 June 2024 (FY24) to mitigate the risk of modern slavery in our operations and supply chain. We have restated relevant information from our previous Statements where our approach and business structure have remained consistent. In addition, we have included reference to initiatives undertaken in the previous reporting period for context, and highlighted notable progress achieved post FY23, up to the time of publishing this Statement.

We value your input and welcome any feedback or questions you may have regarding our Modern Slavery Statement and Framework.





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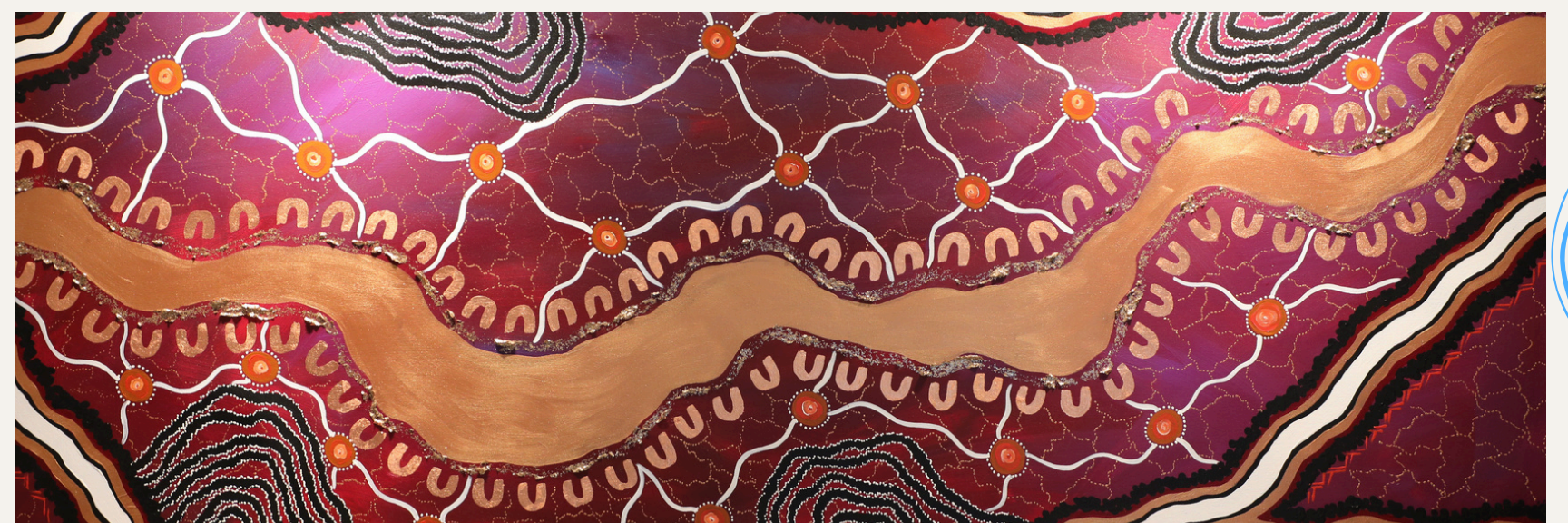
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Acknowledgement of Country

Tradeflex recognises Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation. We respectfully acknowledge the Traditional Custodians of Country throughout Australia and their deep and continued connection to land, waters and community, built over tens of thousands of years. We pay our respects to Elders past and present who have shared the importance of community and the enduring responsibility we have to others through generations of culture, language and wisdom.

Commissioned Artwork by Simone Thomson
www.simonethomsonart.com





Managing Director's Opening Statement

Tradelex's vision is to be the most respected commercial cleaning and facilities management company in Australia in the eyes of our people, customers, and communities.

As a leading industry player, we recognise and acknowledge our responsibility to all stakeholders to adhere to high ethical standards in our business operations and decision-making. Upholding the human rights of all individuals we engage with, directly or indirectly, is a crucial aspect of this responsibility. We hold in high esteem the dedicated personnel working within our organisation and those we collaborate with. We strongly condemn all forms of human rights violations, including slavery and human trafficking. Guided by these strong values, we have taken a proactive approach to implementing policies, procedures, and systems across our business to tackle these issues.

Tradelex has voluntarily produced a Modern Slavery Statement outlining the measures we have implemented to address modern slavery risks and drive change across our extensive supplier network. We take pride in the progress we have made and the initiatives we have undertaken, including our affiliation with the Cleaning Accountability Framework (CAF), Supplier Code of Conduct, and Supply Chain Risk Assessment processes, which form a robust foundation for our program.

We recognise the importance of collaboration and coordination in safeguarding the rights of vulnerable workers. As such, we are committed to working closely with our peers and industry partners to continually improve our business practices and join our extended communities in taking a firm stance on human rights.



John Borg

Managing Director & Founder
Tradelex



Reporting Entities

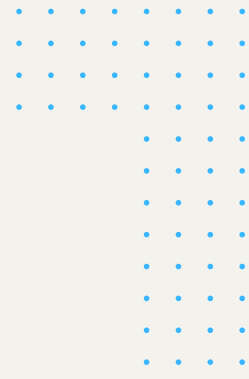
The reporting entities for this Modern Slavery Statement are:

Tradeflex Facility Services Pty Ltd as trustee for the Tradeflex Facility Services Trust & Tradeflex Services Group Pty Ltd as trustee for the Delina Trust.

Tradeflex demonstrates our leadership and commitment in human rights through the considered preparation and release of this statement ahead of formal reporting obligations.

The Statement reports our actions from 1 July 2023 to 30 June 2024. It also includes reference to actions which have occurred after 30 June 2024. Where such actions have been included, the timing has been noted.

Tradeflex has produced a voluntary Modern Slavery Statement that sets out the actions we have taken to both address modern slavery risks and to actively influence change across our broad supplier network.





Our Structure, Operations & Supply Chain

Company Overview

Tradelex is a privately owned business that originated as Supa Clean in 1988. In 1989, the company was incorporated as Tradelex Pty Ltd, and in September 1993, the name was changed to Tradelex Services Group Pty Ltd, operating under the trading name of Tradelex in the cleaning industry. We work collaboratively with clients from various industry sectors, providing commercial cleaning services and facilities services. Our presence spans Australia-wide, with our headquarters located in South Yarra, Melbourne, Victoria. We recognise our business responsibilities and strive to be an industry leader in delivering smart, sustainable solutions that benefit not only our business and clients but also support greater health, wellbeing, and sustainability for people, workplaces, and communities.

Commercial Cleaning Services

Our cleaning services operate under the umbrella of Tradelex Services Group, adopting a direct-employment model. As a leader in the cleaning industry, we take pride in delivering innovative, high-quality cleaning, hygiene, and waste services across various facilities, including government facilities, commercial office buildings, educational facilities, and high-rise apartment towers. Our use of subcontractors is limited to specialised services such as linen service, waste management, sanitary services, and high-level window cleaning. These subcontractors and consumables make up less than 5% of our service provision, with the majority of the cost relating to direct employment expenses.

Facilities Services

Tradelex Facility Services is our facilities management arm, operating separately from our cleaning business. This business unit engages a 99% subcontractor model for the provision of services, with our National Operations Centre team being directly employed.

More information about Tradelex can be found on our website: www.tradelex.com.au

Statistics

1000+

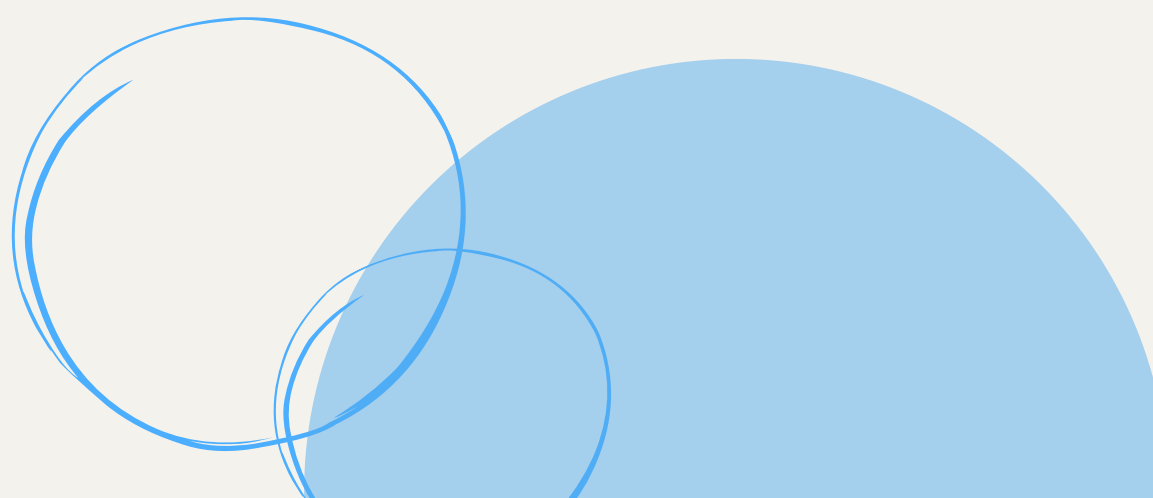
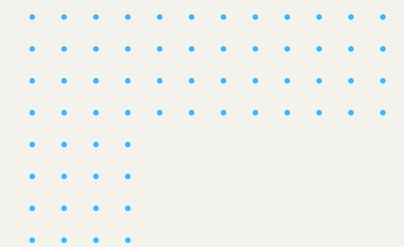
Employees

1988

Operating Since

750+

Properties



Organisational Structure

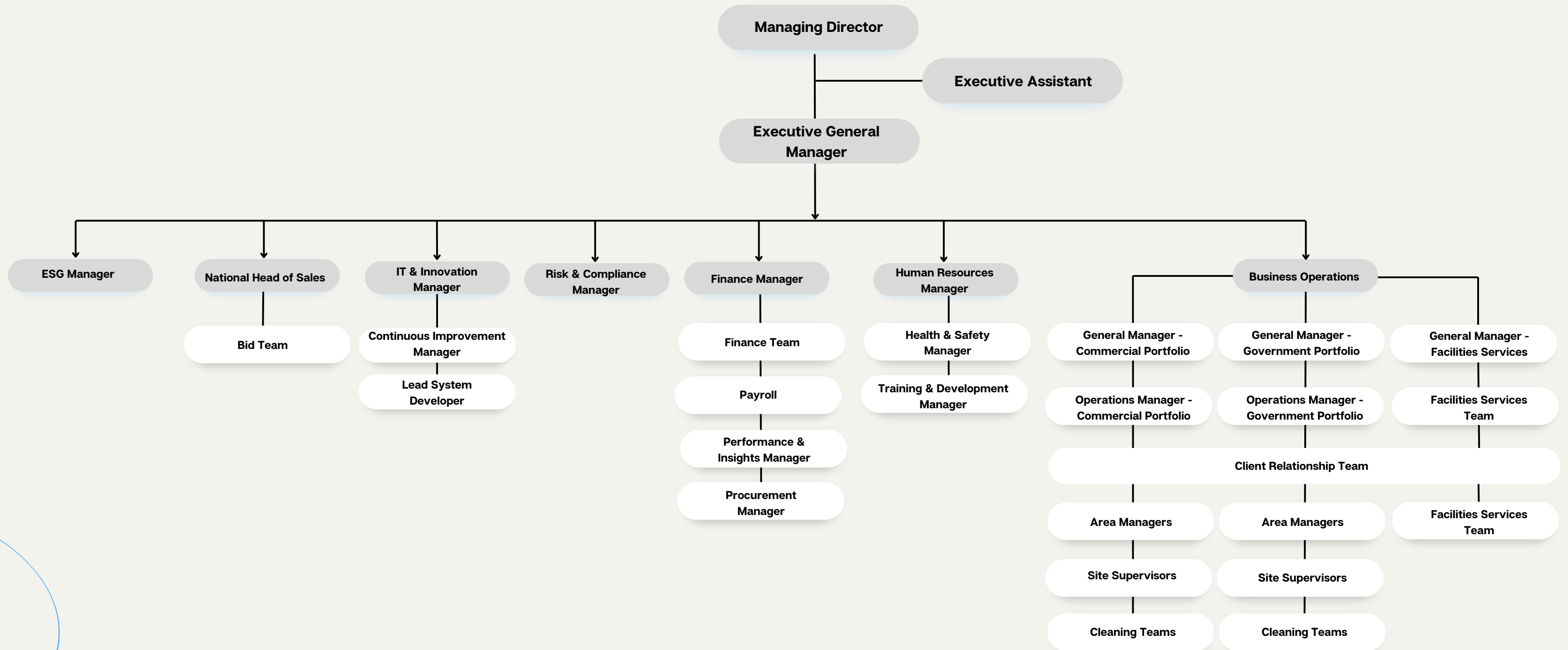


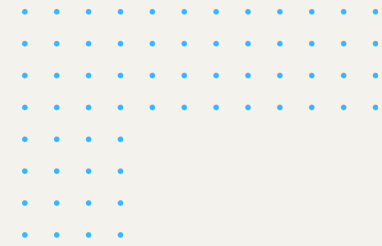
"Our biggest asset is our people." - John Borg

TradeFlex focuses on investing in the continued development of our teams and capabilities. Our key leadership roles are supported by centralised administrative staff, subject matter experts, and dedicated specialists. To ensure clear oversight, support, and structure for our frontline teams, our cleaning area managers, site managers, and cleaning staff report to our Portfolio Leadership Team, ensuring quality, continuity, and high client satisfaction.



Organisational Structure





Supply Chain

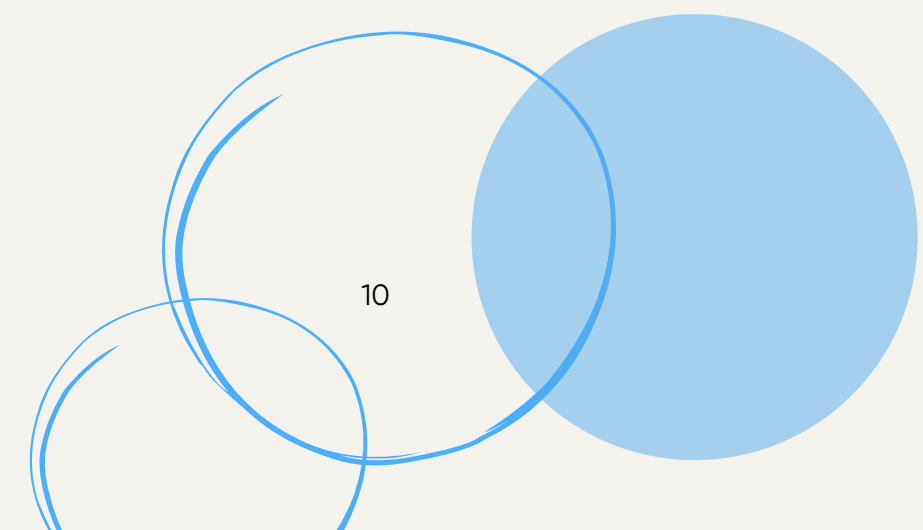
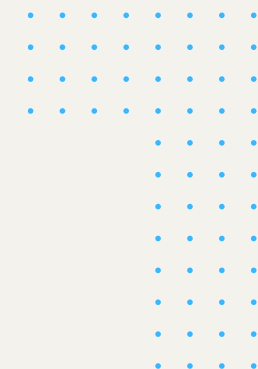
Tradeflex operates a mature supplier management process and proactively engages with our suppliers upon appointment and throughout our partnerships to ensure that our high ethical standards are reflected in those we work with. Our selection and pre-qualification processes include clear expectations detailed in our Supplier Code of Conduct, contractual commitments regarding both the environment and human rights, regular performance management, and processes that encourage suppliers to identify, assess, and manage potential human rights issues in their business practices.

Within our cleaning business, primary services are provided by directly employed cleaning staff. Outside of this, the main goods and services procured frequently within our cleaning supply chain include consumables (cleaning cloths and wipes, toilet paper, gloves, hand towels, bin liners, cleaning chemicals); cleaning equipment (mops, window cleaning accessories, dusters); and cleaning machinery (buffing machines, scrubbing machines, vacuum cleaners). Within our Facilities Services division, our supply chain arises through contractual appointments for property and/or facilities services on behalf of our clients, which includes the facilitation, procurement, and management of services. This supply chain consists of approximately 435 suppliers nationally, providing a range of services including, but not limited to, cleaning, waste and recycling services, security, grounds maintenance, pest control, sanitary services, building maintenance, plumbing, fire maintenance, and equipment hire.

Our total spend for the reporting period was \$50.09m, across a total of 622 suppliers. Of these, Tradeflex enjoy long standing partnerships with our Tier 1 providers, with the introduction of new suppliers managed through our procurement team and in adherence with our procurement and compliance policies and undergo supply chain mapping to confirm the source of goods. Our largest providers across both our Cleaning and Facilities Services divisions are Australian based companies, all operating primarily or exclusively within Australia.

Tradeflex's spend by category for the 12 months ending 30 June 2024:

Cleaning	47.27 %
Security	10.05 %
Waste	9.43 %
Site Maintenance	8.66 %
Electrical	2.41 %
Capital Equipment	2.32 %
Essential Services	3.17 %
Warehouse Maintenance	1.54 %
Consumables	1.11 %
Mechanical Services	1.59 %
All other expenses	12.45 %



Identifying our Modern Slavery Risk

The cleaning and facilities services industry can be susceptible to modern slavery risks via common practices such as subcontracting vulnerable employment groups. Tradeflex has considered the risks within our operations and supply chain that may directly or indirectly cause or contribute to the instance of modern slavery and human rights abuse.

Tradeflex Workforce

Tradeflex consider the risk of modern slavery and exploitative labour practices within its direct workforce to be low. The Fair Work Ombudsman have identified risks within the cleaning and facilities services businesses including the breach of workplace laws, unethical subcontracting arrangements, below minimum wage payments and poor job security.

With an unwavering focus on our people, Tradeflex is able to demonstrate structured and strategic workforce design initiatives that not only address these potential risks, but that actively ensure that our staff have the greatest opportunity to develop and thrive within our organisation, regardless of their background.

Tradeflex operates a direct employment model across our head office and cleaning services, engaging our own direct employees to undertake the cleaning services work, engaging subcontractors for specialised cleaning services only. This business model enables direct oversight of our cleaning teams and provides our team with access to our internal support and safeguard mechanisms. Our leadership teams are structured and trained to provide staff with ongoing support.



Our workforce is made up of approximately 1,013 staff, located exclusively within Victoria in an environment of strong employment, health, and wellbeing standards, regulations and law. All staff are confirmed to have Australian work rights, and all are inducted with information that includes a clear view of our ethical standards and values, our policies and procedures and the employment and workplace rights that they are entitled to.

Tradeflex are able to demonstrate and assure that we are providing leading employment conditions and opportunities to our staff through multiple externally accredited proof points, including our proud support of the Cleaning Accountability Framework (CAF). Tradeflex has been involved in and has passed a CAF certification audit, with CAF being recognised as a leading anti-slavery initiative within supply chains and is at the cutting edge of human rights due diligence to address modern slavery risk.

Further, we maintain certification in ISO 45001:2018 (Occupational Health & Safety) ensuring that our safety practices are of the highest standard. Tradeflex's service processes are performed according to safe work methods, procedures and instructions that have been subject to a risk assessment. Each job function complies with all relevant Workplace Health and Safety legislation, codes of practice and appropriate standards. The company provides and maintains specific safety and health systems that are designed to identify, assess and control hazards and risks associated with company activities.





Tradeflex ensures that all job functions are well designed and make certain that they are inherently safer and healthier because hazards and risks are eliminated before they enter the workplace. In relation to fair reward, Tradeflex is able to demonstrate its stringent compliance with the Fair Work Act, national employment standards and relevant awards at all times. Tradeflex has robust management systems in place to provide correct wages and conditions and superannuation, including appropriate record keeping systems. We actively educate our cleaning staff about their workplace rights and conditions of employment, and systems to verify and monitor visa holders' right to work in Australia.

Beyond compliance, Tradeflex also ensures that men and women are paid equally for work of equal or comparable value.

Pay and conditions are assessed in a non-discriminatory way in that the company values the skills, responsibilities and working conditions in each job. Our structure and processes allow all staff equal access to training, promotions or flexible working arrangements. The outcomes of these processes are made clear in our solid gender equality balance, sitting at 50/50 across all role types, including management.

Tradeflex is also committed to providing a work environment that is free of verbal or physical harassment. Discrimination, harassment or bullying based on race, colour, religion, gender, age, marital status, disability or other factors unrelated to legitimate business interests is not tolerated. The expectations and responsibilities of our team are detailed throughout our policy suite and provided to staff through regular training and development opportunities at and beyond induction.

Employees are also offered access to an Employee Assistance Program, and also wellbeing leave to support mental health and wellbeing across our team.

Tradeflex is an equal opportunity employer and provides equality in employment for all people employed or seeking employment. Every person will be given a fair and equitable chance when undertaking the duties within their position, to compete for appointment (internal or external), promotion or transfer, and to pursue their career as effectively as others. Tradeflex's Equal Employment Opportunity and Affirmative Action Policy is designed to ensure that Tradeflex complies with all of its obligations under relevant acts and legislations.

Tradeflex is committed to ensuring that all employees are treated with respect. The company's Staff Complaint & Dispute Resolution procedure allows Tradeflex to address complaints from staff regarding the behaviour of other staff members or matters that adversely affect their ability to work productively in a positive work environment. Tradeflex recognises its legal responsibility to ensure that staff are not subjected to unlawful discrimination, harassment, victimisation, or bullying. The Complaint & Dispute Resolution procedure aims to resolve complaints fairly, with the goal of resolving conflict and improving working relations.





Supply Chains

Supply chains can, by their multifarious nature, represent more of a risk as the procuring organisation may not always have full visibility of control over the supply chain. Tradeflex has therefore undertaken a baseline risk assessment of its key suppliers, aware of the key risk factors of modern slavery:

- Vulnerable populations;
- Business models structured around high-risk work practices;
- High-risk product and service categories, often sector specific; and
- High-risk geographies.

Tradeflex uses a range of suppliers for the provision of cleaning chemicals, equipment, machinery, specialised services and waste management within our cleaning services division. These suppliers make up a small percentage of the activity and spend in this area, and we engage closely with our four primary providers; all of whom have demonstrated awareness of modern slavery risk and have provided details of their supply chains and modern slavery commitments. Our review of these providers has confirmed that the modern slavery risk is low.

Within our Facilities Services business, we have engaged over 600 suppliers in the delivery of facilities services on behalf of our clients. We adopt a risk-based approach to the procurement and onboarding of suppliers, as well as during the engagement. Tradeflex emphasises the importance of transparency and demonstrates a willingness to work with suppliers to address any issues.

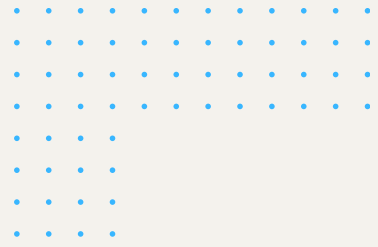
From the outset, Tradeflex's service offering has been developed, delivered, and continually enhanced by the strength of our supplier partnerships. The Tradeflex Partnership Program represents an ongoing investment in our service provider network, and a commitment to working closely with all valued suppliers to ensure that our clients are provided the highest quality of service in an ethical manner and ensuring human rights are at the forefront.

The Tradeflex Partnership Strategy includes the selection and retention of the best suppliers, those that are aligned to our high-quality ethos and high integrity value set in the Tradeflex Partnership Program, which forms the foundation for our best-in-class service delivery performance profile, passed on to our clients. Tradeflex continually reviews the existing supplier base and re-procures our contracted services, to identify, attract, and retain the most appropriate organisations for our clients. Suppliers are selected by service category and organised into a three-tier profile of first, second and third choice, governed by our quality and capability measurement tool. As well as using this supplier approach, Tradeflex's Supplier Code of Conduct articulates the behaviour and conduct expected of suppliers and contractors that we engage. All suppliers participate in a comprehensive Supplier Pre-qualification Questionnaire and ongoing compliance monitoring and improvement, particularly around ethics and human rights. Tradeflex has clear expectations in our Supplier Code of Conduct and related processes that encourage suppliers to identify, assess and manage potential human rights issues in their business practices.

Suppliers are required to achieve and maintain the minimum standards outlined in the Supplier Code of Conduct and must train employees and contracted parties on their rights and responsibilities. Suppliers must be able to demonstrate that they are committed to developing and maintaining systems and processes to avoid involvement in modern slavery or human trafficking. Tradeflex opposes any human rights violation, and we recognise that our corporate and social responsibilities apply not only to our own activities, but also to those within our supply chain.

Tradeflex acknowledges that our lower tier, or infrequently used suppliers are harder to assess and monitor for modern slavery risk. We commit to implementing enhanced processes, communication and expectation clarity across our supplier network, ensuring that these providers are made more aware of the risks and required to demonstrate how they prevent human rights abuse within their own business.





Our Actions

At Tradeflex, we foster an organisational culture that supports all internationally recognised human rights and ethical sourcing practices, seeking to avoid complicity in human rights abuses, including modern slavery. We aim to identify, assess, and manage modern slavery impacts within our spheres of influence and activities. Tradeflex is committed to developing and maintaining systems and processes to avoid involvement in modern slavery or human trafficking. Tradeflex opposes any human rights violations. We recognise that our corporate and social responsibilities apply not only to our own activities but also to those within our supply chain.

With over 600 suppliers across our business, Tradeflex recognises the need for an organised, coordinated, and well measured business response to the risks of modern slavery. Our actions are reinforced through our comprehensive corporate responsibility program and represent an ongoing commitment to ethical business and a priority on people.

Corporate Responsibility Plan

Tradeflex understands that it has an important role to play in delivering services with a social impact to support a better, cleaner, more sustainable place for our clients and communities. We are committed to being an industry leader in smart, sustainable solutions that provide benefits beyond our business, and are passionate about our Corporate Responsibility commitments.

Our Corporate Responsibility Plan is made up of **four key pillars**. These pillars provide a guiding light for decision-making within the business as we seek to deliver the best outcome for all. These pillars are:

- **Environment:** Commitment to sustainable initiatives through our own FutureGreen™ Program
- **Ethical Procurement:** Commitment to sourcing ethically produced products and suppliers
- **Community/Social Impact:** Commitment to diversity and inclusion in person and digitally
- **Leading People Practice:** ISO accredited, and CAF certified, committed to providing a best practice workforce

01

Environment

Commitment to sustainable initiatives through our own FutureGreen™ Program



02

Ethical Procurement

Commitment to sourcing ethically produced products including suppliers



03

Social Impact

A commitment to serving beyond ourselves to provide benefits beyond business

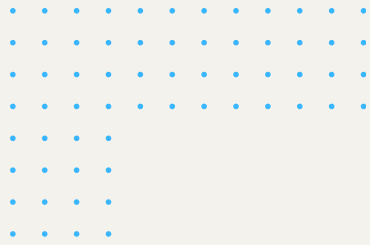


04

People First

Leading the way in working with people, with best practice initiatives to drive diversity, inclusion and equality and a commitment to opportunities for all





Governance

We operate with a Strategic Risk Management Plan and Risk Management Policy and Procedure to ensure organisational risk awareness and proactive control. These frameworks are overseen by Tradeflex's Senior Leadership Team and articulate processes for identifying, assessing, managing, mitigating, and reporting on all material risks, including risks related to human rights. As part of our commitment to compliance and continuous improvement, we employ a dedicated Risk and Compliance Manager, who works independently of our Operations teams to ensure that our people, processes and documentation align not just to a compliant standard, but best practice.

We also employ a highly experienced and dedicated Procurement Manager to oversee the continued development of our procurement frameworks; including those components that ensure a high level of ethical advocacy and supplier assurance. This role is also responsible for seeking diversity within our supplier networks and targeting a greater representation of Aboriginal or Torres Strait Islander owned businesses. Further supporting our drive for better business, we leverage industry accreditation, membership and industry guidelines in the delivery of our service to drive leading, ethical business practice. These include our Cleaning Accountability Framework (CAF) alignment, our Property Council of Australia (PCA) membership and our annual report on actions we are taking to identify risks and remediate instances of modern slavery in our operations and supply chains via the **Modern Slavery Supplier Assessment via the PCA Platform**.

Importantly, Tradeflex Services Group holds triple ISO Accreditation for Management Systems in Quality: 9001:2015; OHS ISO45001:2018 and Environment ISO14001:2015, in cleaning services and is independently audited.



Our Policies

Tradeflex's commitment to human rights applies to our operations, our engagement with third parties, and is embedded in our policies, systems and processes. This commitment is relevant to all areas of our business, in particular our people, our supply chain and procurement practices, compliance and risk management, and our community engagement.

We commit to the following in respect of our key stakeholders:



Transparent policies, processes and reporting practices to communicate our approach and response to human rights in our business practices. A culture that reflects our organisational values that fosters speaking up about things that matter, professional development and learning, and equal opportunity and diversity.



A safe workplace that promotes health and well-being, and is free from discrimination, harassment and bullying.



Fair wages and benefits, and the right to privacy.



Clear expectations in our Supplier Code of Conduct and related processes that encourage suppliers to identify, assess and manage potential human rights issues in their business practices.



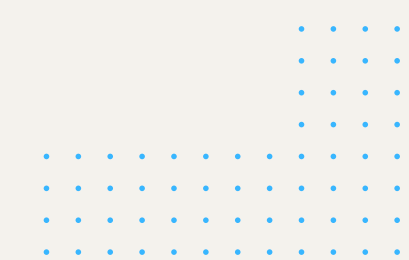
Environments and experiences that promote health and well-being, and social inclusion.



A workplace free from slavery as defined by the Modern Slavery Act 2018, including forced, bonded, involuntary or child labour.



A commitment to communicating and mitigating any potential impacts on human rights.





Tradeflex has various mechanisms in place, including policies, procedures, frameworks and strategies, which underpin how we work and how we engage with our stakeholders. As Tradeflex's operations are Australian based, these mechanisms reflect Australian legislation with regard to human rights, examples of which include privacy, anti-discrimination, and labour laws. In addition to maintaining legal and regulatory compliance, our approach reflects and embeds fundamental human rights in how we operate.

Tradeflex's commitment to human rights is evidenced and supported by the following:



Diversity and Inclusion Policies

At Tradeflex we harness a diverse and inclusive workforce where we value each person's uniqueness. We embrace diverse life experiences and the perspectives of our employees regardless of age, gender, ethnicity, religion, cultural background, disability, or sexual orientation. We also recognise that the strength of an organisations commitment to diversity and inclusion is a key foundation to the genuine advocacy of fair and equal labour practices for all.

Our 'Respect for Diversity Policy and Guidelines' solidifies our commitment to promoting equality and diversity in our workplace, particularly in areas like recruitment, training, and pay.

Tradeflex aim to create work opportunities and be an employer of choice for disadvantaged people through our attraction and recruitment initiatives and practices. Supporting equity and diversity means supporting opportunities for all candidates to find suitable employment. As an inclusive employer, Tradeflex recognises individual differences, embraces individual strengths and looks for opportunities for everyone to achieve their full potential.



Cultural Values and Code of Conduct

Our cultural values and Code of Conduct articulate a common framework around the standard of behaviour expected of all Tradeflex employees, and form part of our induction, as well as ongoing training and engagement activities. We also publicly disclose our priorities and approach to diversity and inclusion, which includes our actions to address gender equality, First Nations people, and mature age worker inclusion.



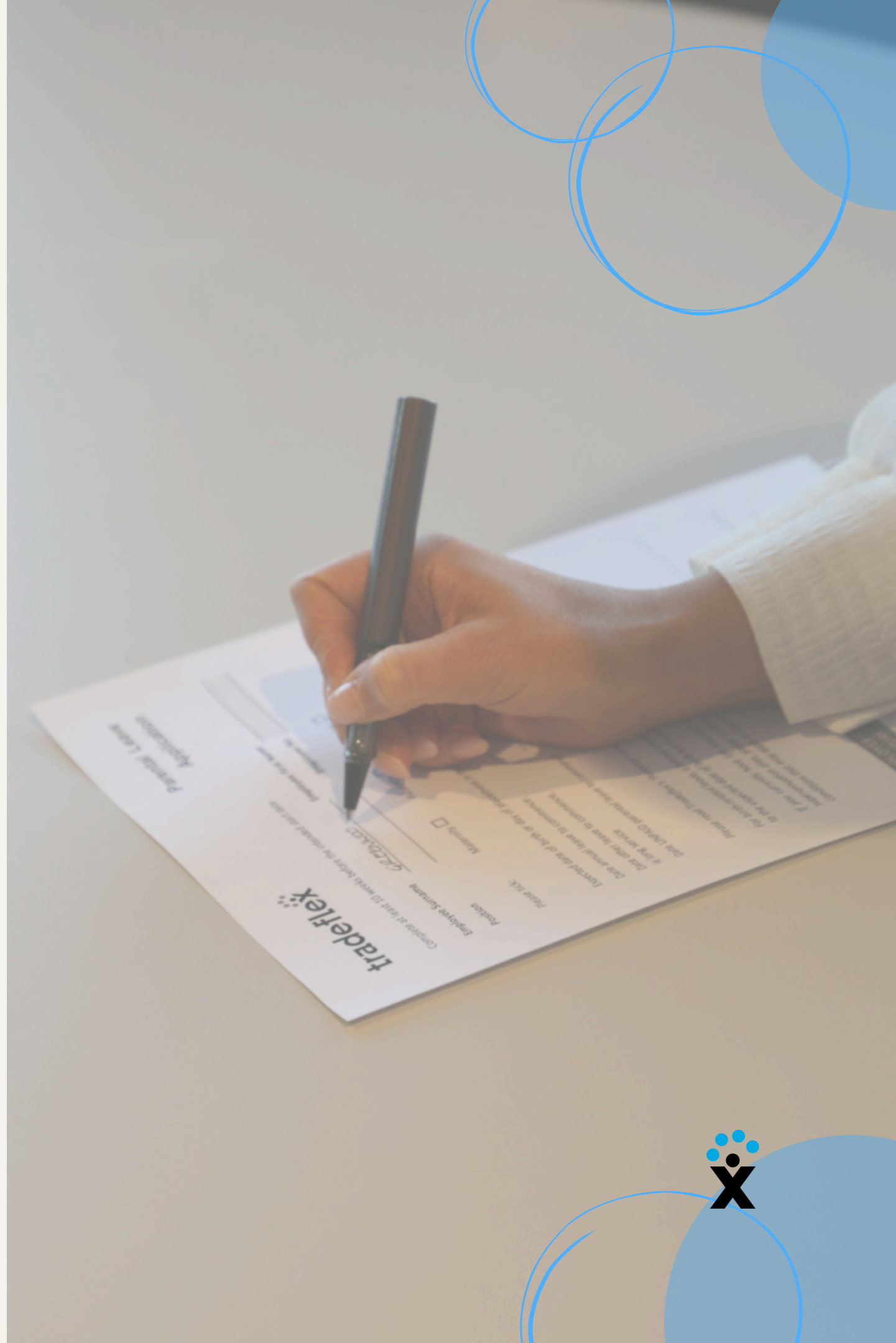
Modern Slavery Policy

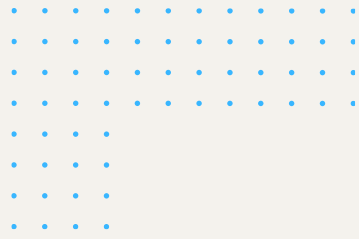
Tradeflex's Modern Slavery Policy outlines the company's commitment to ethical business practices. We respect human rights and take steps to ensure that human slavery or abuse do not knowingly enter our supply chain. Tradeflex complies with all employment laws and ethical labour policies.



Privacy Policy

Our Privacy Policy sets out our practices relating to privacy to ensure all personal information collected by Tradeflex is handled in line with legal and regulatory requirements. We recognise individuals have a right to understand these practices, and a right to have access to the personal information we hold about them. We also recognise some personal information is sensitive and only collect this with consent from the individual and in accordance with the Privacy Act.





Training and Awareness

Tradeflex are committed to the ongoing learning, development and career pathways for our team members. These commitments are detailed in our Learning and Development Policy and Education Support Policy. An overview of our key initiatives is provided below.



Employment Rights

As part of our annual training and development program, Tradeflex deliver mandatory training to all people leaders detailing the compliance obligations, fair work practice and leading ethical employment standards – including those related to diversity, inclusion, safety and human rights.



Learning Lab

We are committed to ensuring that all new and existing employees are appropriately skilled and trained. Whilst priority is placed on safety and job-related knowledge and skill, organisational knowledge and upholding our core values are also important parts of how Tradeflex continues to deliver a service that is 'better than you expect'. Tradeflex has a bespoke, online, interactive Learning Lab, which will allow our site teams to receive the most up-to-date training.



Remediation Processes

Tradeflex has long standing reporting and grievance frameworks, encouraging all stakeholders to report any concerns or feedback they may have regarding how we manage human rights in our operations and our supply chain. We will act quickly to investigate and resolve any suspected human rights violations and review our practices and policies regularly.





Supplier Management

Whilst subcontractor/suppliers make up a very small percentage of our cleaning business, our facilities services arm partners with hundreds of providers in the delivery of a national service.

The diligent engagement of suppliers, is foundational to our actions in supplier management, including the provision of a supplier code of conduct and related contractual commitments surrounding both environment and human rights. On engagement and throughout our partnerships, we require our suppliers to comply with all applicable laws and regulations and with our Human Rights Policy, Modern Slavery Policy and Supplier Code of Conduct. Suppliers are expected to maintain fundamental human rights standards, with Tradeflex applying a zero-tolerance approach to breaches or non-compliance.

Tradeflex's Supplier Code of Conduct articulates the behaviour and conduct expected of suppliers and contractors that we engage. All suppliers participate in a comprehensive supplier pre-qualification questionnaire and ongoing compliance monitoring and improvement, particularly around ethics and human rights. Tradeflex has clear expectations in our Supplier Code of Conduct and related processes that encourage suppliers to identify, assess and manage potential human rights issues in their business practices. Furthermore, we expect supplier to train employees and contracted parties on their rights and responsibilities and must be able to demonstrate that they are committed to developing and maintaining systems and processes to avoid involvement in modern slavery or human trafficking.

Tradeflex have commenced a detailed procurement review process, aimed at enhancing the foundations of our supplier engagement and management program to achieve three key outcomes:

- Review and assurance of all suppliers, with refreshed contractual obligations that include comprehensive reference to ethical obligations.
- Enhanced focus on both diversity (through the leverage of our supply nation membership) whilst simultaneously consolidating our supplier network to ensure that we have the best contractors in all locations.
- Improved advocacy of human rights in close partnership and collaboration with our suppliers and the broader industry.



Cleaning Accountability Framework

The Cleaning Accountability Framework exists to end exploitative labour practices across the property industry and improve labour standards through advocacy and targeted guidance on enhancements.

In 2021, Tradeflex achieved its first 3-star CAF certification, following an independent assessment of the procurement, management, and delivery of cleaning services at 447 Collins Street, Melbourne. Furthermore, employment practices relating to our cleaning services at this building, including a rigorous supply chain audit, and a worker engagement process was also completed. CAF's assessment of labour standards at a building or precinct is centered on identifying dangerous or substandard working conditions and implementing best practice employment practices. This audit and resulting pre-qualification shows Tradeflex is able to demonstrate its commitment to our employees and providing them with excellent working conditions.

Tradeflex work cooperatively with CAF to drive responsible employment standards, and leading practice in the ethical delivery of cleaning services. This cooperation and collaboration will continue as the certification is introduced across more buildings within our portfolio, driving ongoing independent assessment and continuous improvement opportunities for us.

To highlight our cooperation and transparency, **CAF Program Officer, Emma Conos**, states on their website that there was ***“Exemplary cooperation by all stakeholders, they were all really engaged. When you see this level of cooperation, it demonstrates that everyone is on board and is genuinely trying to achieve our mission and that this is not just another box ticking exercise for them.”***



Assessing Effectiveness



Tradelex has established a strong foundation and commitment to social responsibility, and the actions required to advocate for and prevent modern slavery and human rights abuse.

Our key actions throughout the reporting period include the baseline review and supply chain mapping of our Tier 1 providers and enhancement of our supplier engagement and management processes. We have also reviewed our policies and released revised Modern Slavery and Human Rights Statements to clearly signal our position and expectations to our team, our partners and as part of our industry.

As a leader in our field, we commit to continued review and improvement of all of our business practices, and to join our extended communities in taking a stand for human rights. We will continue to measure and monitor our progress against our target activities and engage the broader industry to continue learning and striving for best practice.

🏆 KPI 1 – MODERN SLAVERY TRAINING DELIVERED TO 100% STAFF, AND RISK IDENTIFICATION TRAINING DELIVERED FOR RISK MANAGEMENT TEAM

🏆 KPI 2 – MODERN SLAVERY QUESTIONNAIRE COMPLETED AND ASSESSED FOR 100% OF TRADEFLEX SUBCONTRACTOR AND PROVIDERS (ANNUALLY)

🏆 KPI 3 – COMPLETION OF THE ANNUAL SUPPLY CHAIN RISK ASSESSMENT AND RISK MITIGATION DELIVERY

	Performance Indicator	Progress & Performance
Modern Slavery Statement	<ul style="list-style-type: none"> Statement prepared with organisational consultation. Statement voluntarily lodged. 	Preliminary statement prepared for submission.
CAF Certification	<ul style="list-style-type: none"> Compliance to CAF Certification and Annual Health Check. 	Last reviewed as part of 447 Collins St Certification February 2024.
Supplier Onboarding	<ul style="list-style-type: none"> % of suppliers onboarded and assured to conformance with Tradelex's Human Rights Policy and Modern Slavery. 	Investment in dedicated Procurement Manager to drive onboarding compliance and assurance.
Supplier Management	<ul style="list-style-type: none"> Active performance management of all Tier 1 suppliers. Regular agenda item in performance meetings in reviewing addressing modern slavery risks. 	<p>Investment in dedicated Procurement Manager to establish regular performance meetings with Tier 1 providers.</p> <p>Review and update of Supplier Code of Conduct.</p>
Training & Awareness	<ul style="list-style-type: none"> All Tradelex managers trained to recognise and safeguard against modern slavery risks. % of staff trained to value diversity, equality and fairness in identifying and safeguarding against modern slavery risks. 	Delivery of mandatory training to all head office staff and people leaders regarding employment law and ethical practice.



Principal Governing Body Approval

On **19th July 2024**, this Modern Slavery Statement for FY2023-2024 was approved by the Board, acting as the principal governing body of Tradeflex Service Group, ABN 59 500 445 667, as defined by the Modern Slavery Act (Cth).

This modern slavery statement is signed by a responsible member of Board of Directors as defined by the Act 4:

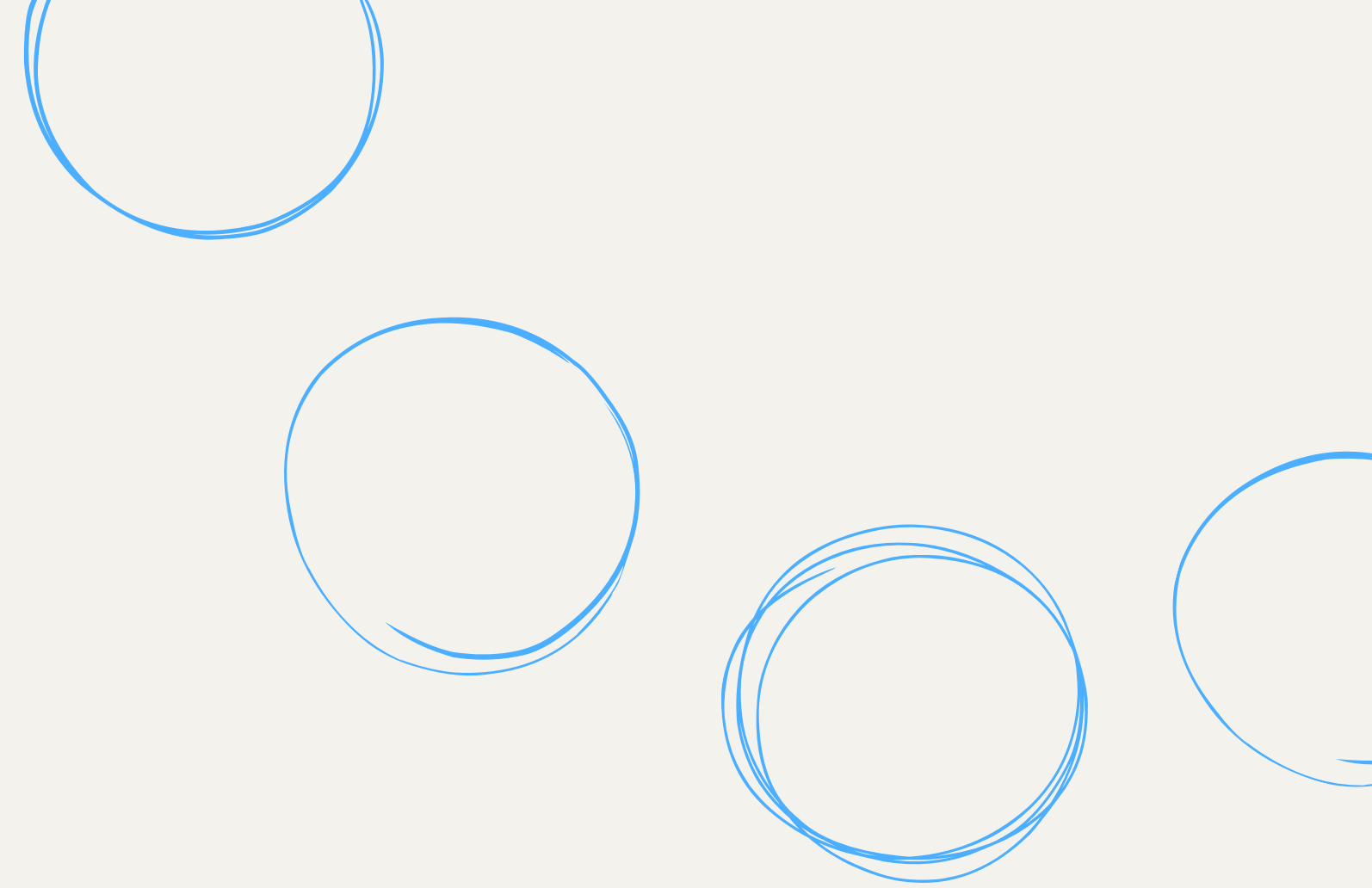
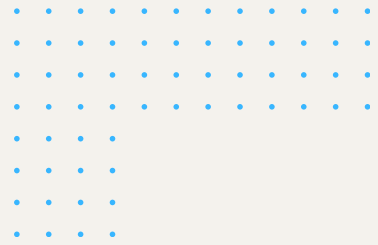
Managing Director

Our FutureGreen™ team meets bi-monthly to consult on and discuss, health, safety and environmental inspections, plans, projects, case studies, training completion rates and broader operational risks. The team includes various heads of business units and is reported back to senior management and managing director for approvals.

Mandatory Criteria	Page reference in Statement
Criteria 1 - Identify Reporting Entity	Page 6
Criteria 2 - Describe the entities structure, operations and supply chains	Page 8 - 10
Criteria 3 - Describe the risks of modern slavery in the operations and supply chains of the reporting entity and entities it owns or controls	Page 11 - 13
Criteria 4 - Describe the actions taken by the entity and entities it owns or controls to assess and address the risks (this includes due diligence and remediation)	Page 14 - 15
Criteria 5 - Describe how the reporting entity assess the effectiveness of the actions	Page 19
Criteria 6 - Describe the process of consultation with entities that the reporting entity owns or controls	Page 20
Criteria 7 - Provide any other relevant information	NA



tradeflex



Tradeflex

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