

Bayton Group Modern Slavery Statement

This voluntary statement, under the Australian Commonwealth Modern Slavery Act 2018, outlines the risks of modern slavery in the Bayton Group's operations and supply chains and the actions adopted to address those risks. The Bayton Group refers to all entities highlighted in Appendix 1.

The Bayton Group has been developing and improving cleaning solutions to help its clients succeed since 1965. Wholly Australian-owned and operated, the Bayton Group provides services nationally with offices in New South Wales, Queensland, and Victoria. The portfolio of clients includes over 550 sites Australia-wide, covering a variety of industries, including Health and Aged Care, Retail, Commercial, Hospitality, and Industrial. Bayton has approximately 150 directly employed employees and utilises the services of labour-hire providers and suppliers to fulfil our service obligations.

From small to large businesses, multi-story office complexes to age care facilities, Bayton Group offers services that include:

- General Cleaning,
- Public Area Cleaning,
- Tenancy Cleaning,
- Home care services,
- Outbreak management,
- Pressure washing,
- Strip and seal,
- Kitchen deep cleans,
- Carpet steam cleaning,
- Waste management,
- Garden Maintenance
- Street and Car Park Sweeping,
- Testing and Tagging
- Graffiti removal and more.

Our goal is to establish enduring partnerships, underpinned by our unwavering commitment to superior service, expertise, communication, and continuous improvement. This approach ensures our clients' needs are met with the highest standards of service excellence.

At Bayton, we are dedicated to fostering a diverse and inclusive workforce. We are proud to be an equal opportunity (EEO) employer, and our commitment to these values is unwavering. Our core values of excellence, transparency, teamwork, continuous improvement, and fun are the foundation of our positive work environment.

Bayton is unwavering in its commitment to maintaining and continually improving our systems and processes to prevent any involuntary involvement in human rights violations. We are dedicated to ensuring that our operations, supply chain, and services uphold the highest ethical standards. While

using externally produced cleaning products, equipment, or services, including those provided by labour-hire providers or subcontractors, poses a risk, we are constantly working to mitigate these risks. Additionally, we are vigilant against the threats of bribery and corruption in our service delivery operations.

In the event of a suspected breach, employees can report personal work-related complaints as per Bayton's Grievance Policy and/or report observed or potential misconduct by individuals who are or have been related to Bayton as per the Whistle-blower Policy. Both policies can be accessed at Bayton's intranet, myBayton, and in the Bayton Group's Handbook.

Bayton currently has several documents and processes that support our efforts to ensure *Modern Slavery* does not exist within our supply chain, including:

- Supplier code of conduct via Subcontractor Agreement issued to all labour-hire providers and specialised service providers
- Employee Code of Conduct via Bayton Group Handbook
- Anti-Fraud and Corruption Policy
- Anti-Sham Contracting Policy
- Anti-Slavery Policy
- Conflict of Interest Policy
- Consultation Policy
- Whistle-blower Policy
- Industrial Relations Policy
- Workplace Discrimination and Harassment Policy
- Equal Employment Opportunity Policy
- Gender Equality Policy
- Family and Domestic Violence Policy
- Privacy Policy
- Right to Disconnect
- Grievance Policy
- Quality, Environment and Health and Safety Policy
- Corporate Social Responsibility Policy
- Sustainable Procurement Policy
- Information Security Policy
- Return to Work Program
- Supplier Modern Slavery Questionnaire issued to all suppliers of goods and services
- Scheduled Supplier Audits conducted by Bayton QEHS Manager
- Annual National Subcontractor Toolbox Talk facilitated by the QEHS Manager
- Annual Employee Satisfaction Survey
- Annual Financial Audit conducted by external auditor
- Annual external accreditation against ISO Standards ISO 45001:2018 Occupational Health and Safety, ISO 9001:2015 Quality and ISO 14001:2015 Environment
- Supplier Audit conducted by external auditor on demand.

Actions and Progress between Financial Years 2019-2024

- Reviewed and updated the Bayton policies on discrimination and harassment, grievance and anti-fraud and corruption.
- Created and issued the Bayton policies on Conflict of Interest, Whistle-blower, Corporate Social Responsibility, Sustainable Procurement, Information Security, Anti-Sham Contracting, Anti-Slavery, Privacy, and Right to Disconnect Policies.
- Reviewed and updated the Bayton QEHS Procedures Manual and the Bayton Subcontract Agreement to include supplier code of conduct.
- Introduce Statutory Declarations for Queensland and Victorian labour-hire providers or subcontractors.
- Renew Statutory Declarations annually for all labour-hire providers or subcontractors nationally.
- Bi-annual supplier audits in Queensland and Victoria.
- Quarterly supplier audits conducted in NSW
- Annual audit of Bayton employees conducted by Bayton QEHS Manager or external auditor alternatively.
- Supplier and Bayton Employee Audit conducted by ISO Safe Australia.
- Compliance Agreement executed with HSU NSW Branch.
- Financial Audit conducted by an external auditor annually.
- Maintained certification to ISO 9001, 14001 and 45001.
- ISO surveillance and re-certification audit conducted by SAI Global.
- Enhanced Bayton employee induction to include modern slavery awareness.
- Employee toolbox talks held on modern slavery, racism, workplace violence and aggression, Bayton Code of Conduct, R U OK? Day and Safety.
- Mandatory training for all senior leaders, those in procurement and account managers in modern slavery, sustainability, sustainable procurement, cybersecurity, bribery, and corruption.
- Bayton Group Supplier Modern Slavery Questionnaire introduced and deemed mandatory for all Bayton Suppliers.
- Updated Subcontractor Agreement to include Compliance with Legal Requirements such as Modern Slavery, Fair Work Standards, Anti-Sham Contracting and a questionnaire on Compliance with Workplace Laws.
- Subcontractor Toolbox Talks on Modern Slavery, Service Requirements, Supplier Audit Requirements and Compliance to Workplace Laws.
- The annual National Subcontractor Toolbox Talk facilitated by the QEHS Manager is done online.
- Enhanced Supplier Audit criteria to include verification of Compliance with Workplace Laws.
- Undergo Annual Sustainability Assessment, including social compliance via EcoVadis and SEDEX platforms.
- Australian Human Rights Commission e-learning on Anti Racism participated by members of Bayton Senior Management
- Participated in the United Nations Global Compact and its Australian Network.

The QEHS Manager analyses the effectiveness of the above actions at different stages throughout the year. The actions and their effectiveness are reviewed at the Bayton Management Review Meeting.

The Bayton Executive Leadership Team, led by CEO Con Katsinas, will consult with the Bayton Board of Directors, who oversee all Bayton Group entities, at the scheduled Bayton Group board meeting.

Signed by:



Con Katsinas, Bayton Group CEO

Dated: 17 September 2024

Appendix 1

Company	ABN	Company	ABN
Bayton Group Holdings Pty Ltd	42 000 769 880	Bayton Property Services Pty Ltd	58 010 647 006
Bayton Cleaning Co. Pty Ltd	13 000 586 247	Bayton Property Services (VIC) Pty Ltd	87 079 412 114
Bayton Cleaning Employment Co Pty Ltd	79 083 052 644	International Hotel Services Pty Ltd	53 080 511 557

Review History

Revision No.	Details	Revision Date
00	Document creation	19/07/2019
01	Grammatical and 2020 actions updates and additions	23/07/2020
02	2020 actions updates and additions	12/08/2020
03	2021 actions additions	22/09/2021
04	Updates on related documents and additional actions	04/01/2022
05	2022 actions updates and additions	04/10/2022
06	2023 actions updates and additions	10/10/2023
07	Additional 2023 actions and change in Bayton entities in Appendix 1	01/11/2023
08	2024 actions updates and additions	17/09/2024

Bayton Group Anti-Slavery Policy

Bayton Group is committed to upholding workers' human rights and treating them with dignity and respect. It is also committed to paying employees and providing conditions of employment in accordance with an applicable and lawful industrial instrument approved by the Fair Work Commission and to the standards set in the Fair Work Act 2009.

Purpose of this policy

The policy defines the Bayton Group's commitment to contribute to ending all forms of modern slavery. It outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.

Scope of this policy

This policy applies to all Bayton Group employees and any subcontractors within the Bayton Group supply chain, including full-time, part-time, casual, and contracted workers.

Related Policy Guidelines or Documents

- The Bayton Group Subcontractor Agreement include provisions requiring disclosure of modern slavery risks,
- Supplier Modern Slavery Questionnaire issued to goods and services suppliers as part of the pre-qualification and engagement processes.
- Supplier Audits and Assessments
 - Document reviews and audits must be conducted annually to comply with legislative requirements.

Definition and Examples of Modern Slavery

Modern Slavery is defined in the Modern Slavery Act (Cth) 2018 as conduct which would constitute:

1. an offence under Division 270 or 271 of the Criminal Code; or
2. an offence under either of those Divisions if the conduct took place in Australia or
3. trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
4. the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done in Geneva on 17 June 1999 ([2007] ATS 38).

More broadly, Modern Slavery may be defined as conduct which would constitute:

- any conduct constituting a modern slavery offence,
- any conduct involving the use of any form of slavery, servitude or forced labour to exploit children or other persons taking place in the supply chains of The Bayton Group.

Bayton Group Guidelines

As part of our hiring process, workers must be engaged locally where available, be entitled by law to work in Australia and hold all relevant licenses, certificates, visas, or authorisations to conduct the work for which they have been engaged.

All work must be voluntary and workers shall be free to leave work at any time or terminate their employment in accordance with the relevant employment legislation, regulations or workplace laws governing the employee's engagement.

The Bayton Group and/or any of their suppliers may not hold or otherwise destroy, conceal, confiscate, or deny employees access to their identity or immigration documents, such as government-issued identification, passports, or work permits, unless such holdings are required by law.

Workers shall not be required to pay employers' or agents' recruitment or other related fees for their employment. If any such fees are found to have been paid by workers, such costs shall be repaid to the worker.

Child or student labour is not to be engaged by the company or its suppliers.

In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, bargain collectively, engage in peaceful assembly, and refrain from such activities. Additionally, workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

Reporting Concerns

As required by law, the Bayton Group will report to the Minister on the actions it has taken to prevent Modern Slavery within its structure, supply chains, and organisation.

Reporting unethical or unlawful conduct

A crucial part of supporting ethical standards is enabling The Bayton Group and its subcontractors to feel free and safe to speak up when there are reasonable grounds to suspect that any person associated with The Bayton Group is not acting ethically or in accordance with laws and obligations.

Concerns about compliance or ethical issues or illegal or unethical activities are to be reported

to the Bayton QEHS Manager with email – gehs@bayton.com.au.

Actions The Bayton Group will take to eradicate Modern Slavery within its Supply Chains

The Bayton Group is committed to regularly reviewing supply agreements to ensure that it does not engage suppliers that breach Modern Slavery legislation.

The Bayton Group is committed to holding its suppliers accountable for their commitment to eradicating Modern Slavery. It will not knowingly engage suppliers who do not align with its position on enforcing basic human rights.

All The Bayton Group supply contracts will include a clause pertaining to Modern Slavery requiring the Supplier to:

1. Provide commitments to eradicating Modern Slavery within its own supply chains;
2. Warranting that it has not been convicted of a Modern Slavery offence; and
3. Have completed its own due diligence on its supply chain.

The Bayton Group will conduct risk assessments to determine which areas of its supply chain are most at risk of Modern Slavery offences and implement risk minimisation strategies.

The Bayton Group will review supplier contracts in conjunction with the Acts and ensure that the terms in supplier contracts are consistent with and address the Acts' requirements.

The Bayton Group will perform due diligence on its suppliers' supply chains.

Training

The Bayton Group will provide training to inform employees of this policy and what constitutes Modern Slavery.

Protections

The Bayton Group will protect individuals who report or identify Modern Slavery within the organisation and supply chains.

Policy dissemination

The policy is made available to all Bayton Group managers at myBayton and in any other way that ensures it is made available to persons to whom this Policy applies.

This policy works in conjunction with the other Bayton Group policies, specifically:

- Corporate Social Responsibility Policy
- Sustainable Procurement Policy
- Whistle-blower Policy
- Grievance Policy

Policy Governance

The policy will be reviewed annually. Adherence to the policy is monitored, measured, and reported in the bi-annual management review meeting. Objectives and targets are periodically reviewed for suitability and refined to ensure continual improvement.

Bayton Group reserves the right to vary, replace or terminate this policy from time to time.

More information

If you have a query about this policy or need more information, please contact gehs@bayton.com.au.



Con Katsinas
Chief Executive Officer
24 July 2024

Review details

This policy is adopted by Bayton on 24/07/2024

This policy was reviewed on 24/07/2024.

Addendum – Modern Slavery Action Plan

Supply Chain Mapping and Risk Assessment

The Bayton Group maintained a supplier base of **381** during the reporting period 2023-2024. The Bayton Group is committed to engaging suppliers of goods and services locally, with 100% of Suppliers located within Australia, where the risk of modern slavery is low.

During 2023-2024, The Bayton Group’s payments to suppliers totalled **\$41M**. Below is a breakdown of this expenditure by sector:

Sector	Function/Operations	Total % of Supplier Expenditure
Information Communication and Technology	Telecommunications, Computing and Software license costs	0.67
Building Occupancy Services	Infrastructure rental and maintenance costs	0.72
Waste Collection Services	Waste removal costs	0.52
Logistics Services	Courier, Freight, Postage and Transport costs	0.14
Equipment	Office and Cleaning Equipment purchase, rental and maintenance costs	0.34
Utilities	Electricity and Water bills	0.05
Materials and Consumables	Office supplies, Uniforms, Cleaning Materials and Chemicals	3.10
Professional Services	Consultancy, Audit, Subscriptions, Legal and Financial Advisor costs	0.67
Specialised Services	Cleaning and Maintenance Services	3.06
Labour Hire Services	Cleaning Services	90.74

We also analysed our expenditure by location, as recommended by the globally recognised modern slavery risk assessment approach employed by the Global Slavery Index.

Location of Expenditure	Total % of Supplier Expenditure
NSW	66.82
QLD	9.07
TAS	0.84
ACT	2.01
WA	0.45
SA	0.74
VIC	20.07
NT	0.00
TOTAL	100%

Supplier Risk Mitigation and Monitoring

As we are directly involved in corporate cleaning and maintenance of office (and other commercial) buildings, we recognise that these are all sectors with known modern slavery risks. We have identified cleaning and maintenance services as our highest risk and have focused our investigation on this area in this Plan.

We plan to:

- Continue to assess risks within our operation and supply chains,
- Engage closely with high-risk suppliers to assess their modern slavery practices and,
- Follow-up response to any findings and implement contractual controls to prevent Modern Slavery Risks. In a severe breach, we may terminate a Supplier's Agreement and source goods or services from others within the market.

Our Controls to reduce Supplier Risks include:

- Supplier Agreements that include Modern Slavery clauses and declarations,
- Revising our policies and procedures to include modern slavery compliance requirements,
- Evaluating Modern Slavery compliance during Supplier onboarding and
- Conducting Supplier assessments that consider Modern Slavery risks.

Risk Criteria	Expectation
Supplier onboarding	New suppliers are required to complete a Supplier declaration that incorporates an evaluation of their Modern Slavery Risks. Supplier Agreements contain appropriate modern slavery clauses.
Supply Chain Mapping and Risk Assessment	Supply chains have been mapped. Modern Slavery risks in operations and supply chains have been assessed.
Supplier Risk Mitigation and Monitoring	Supplier performance is monitored to confirm ongoing compliance.
Supplier Reporting	Providing transparency to Stakeholders to ensure accountability and improvement.

Supplier Reporting

We recognise that reviewing and assessing our actions to identify and address modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continuing to build upon. To this end, we set annual goals to reach so we can look back, assess the effectiveness of our approach and inform our path forward.

We will monitor the effectiveness of our Controls by regularly consulting with and reporting to the Commission and other stakeholders to achieve transparency. Our annual Supply Chain Reporting will summarise the results of our Assessments, Risk Mitigations and Monitoring results.

Consultation

We consulted the relevant companies we own or control in developing this Plan.

This Addendum was approved by the principal governing body of The Bayton Group on 17 September 2024. This statement shall be reviewed yearly, with the following review date being 17 September 2025.

Record of Authorisation from principal governing body Members:



Con Katsinas, CEO
17 September 2024