



Modern Slavery Policy Statement

Just Focus Pty Ltd

Version: 1.0

Issue date: 01 December 2025

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1. Introduction

Just Focus Pty Ltd (“Just Focus”) is committed to protecting human rights and ensuring no aspect of our operations or supply chains contributes to modern slavery, human trafficking, forced labour, debt bondage, or exploitation.

Although we do not meet the mandatory reporting threshold under the Modern Slavery Act 2018 (Cth), we choose to **voluntarily submit this Modern Slavery Statement** to uphold transparency, demonstrate industry leadership, and strengthen procurement and governance standards within the Australian cleaning and facility management sector.

As a national service provider operating in industries known to have heightened labour, subcontracting and supply-chain vulnerabilities, we recognise the importance of maintaining robust ethical safeguards.

2. Reporting Entity (Section 16(a))

This Modern Slavery Statement is submitted voluntarily by:

Just Focus Pty Ltd

ABN 46 155 790 971

Unit 5, 21 Rai Drive, Crestmead QLD 4132

www.justfocus.com.au

Just Focus Pty Ltd does **not** own, control, or operate any subsidiaries or controlled entities.

3. Structure, Operations & Workforce (Section 16(b))

3.1 Corporate Structure

- Australian proprietary limited company
- Privately owned
- Single legal entity with national operations
- Governance overseen by Directors and Executive Management

3.2 Operational Footprint

We deliver integrated cleaning and facility management services across:

- Retail
- Commercial



- Aged Care
- Government
- Education
- Medical
- Industrial & Logistics

Just Focus manages over **300+ active sites** in QLD, VIC, NSW and SA.

3.3 Workforce

Our workforce includes:

- Direct employees
- Casual staff
- Site supervisors
- Subcontractors for specialist maintenance work

Every worker undergoes:

- Right-to-work checks
- ID verification
- HR and WHS onboarding
- Modern slavery awareness training

Our operations are supported by:

- Central Compliance Team
- HSEQ Department
- HR and Onboarding Team
- Central Operations Group (COG)
- Project Managers
- Site Supervisors

4. Supply Chain Overview

Our supply chain includes:

4.1 Goods

- PPE (gloves, masks, safety items)
- Chemicals and cleaning consumables
- Microfibre products
- Electrical cleaning equipment
- Machinery parts
- IT hardware
- Corporate uniforms

4.2 Services

- Specialist trades (electrical, HVAC, plumbing)
- Waste management



- Pest control
- IT software vendors
- Logistics and distribution
- Labour-hire subcontractors (limited, monitored)

4.3 Geographic Exposure

Our supply chain extends across:

- **Australia** (primary procurement)
- **Southeast Asia** (PPE, chemicals, consumables)
- **Europe / USA** (equipment components)

We recognise elevated risk in manufacturing sectors located in:

- Malaysia
- China
- Vietnam
- Bangladesh

5. Modern Slavery Risks (Section 16(c))

We conducted a risk assessment considering:

- Workforce vulnerability
- Country risks
- Product/material risks
- Industry-specific risks
- Recruitment practices
- Supplier transparency
- Subcontracting layers

5.1 Operational Risks

- Cleaning industry reliance on migrant labour
- Low-skilled or vulnerable worker groups
- Potential wage underpayment in subcontractor networks
- High turnover and decentralised operations increasing oversight challenges

5.2 Supply Chain Risks

- PPE production in Southeast Asia (high-risk sector)
- Chemical manufacturing in overseas factories
- Multi-tiered international suppliers lacking transparency
- Electronics manufacturing (forced labour risks reported globally)

5.3 Industry Risks

Cleaning and FM industries have:

- Documented risks of exploitation



- Use of subcontracted labour
- Outsourced production in high-risk manufacturing countries

We recognise the need for proactive risk mitigation.

6. Actions Taken to Assess and Address Risks (Section 16(d))

Just Focus has implemented a multi-layered modern slavery framework aligned with:

- ISO 9001 Quality
- ISO 14001 Environmental
- ISO 45001 WHS
- ISO 41001 Facility Management Standards

6.1 Governance & Policy Framework

We maintain:

- Modern Slavery Policy (CD-106)
- Ethical Procurement & Supplier Code
- Whistleblower Policy
- HR Recruitment & Right-to-Work Procedure
- Incident & Non-Compliance Management Procedures
- Subcontractor Management and Vetting Procedure

6.2 Supplier Due Diligence

All suppliers and subcontractors undergo:

- Pre-qualification screening
- Ethical sourcing declarations
- ABN, insurance, and licence verification
- Compliance with Fair Work & NES
- Contract clauses prohibiting modern slavery
- Right-to-work verification for labour-hire personnel

High-risk suppliers must provide:

- Evidence of ethical sourcing
- Certifications (Sedex, ISO, BSCI, SA8000)
- Country-of-origin disclosures

6.3 Worker Safeguards

- No recruitment fees
- No holding of passports/identity documents
- Strict prohibition of child labour
- Mandatory bilingual employment agreements
- Transparent wage payments through payroll
- Immediate reporting channels for concerns



6.4 Training & Awareness

Training is delivered through:

- HR onboarding
- Just Focus Workforce App
- Annual refresher training
- Toolbox sessions for operational staff
- Management training on supplier risk

6.5 Monitoring & Audits

We conduct:

- Annual supplier risk assessments
- Internal HSEQ audits
- Spot checks on subcontractors
- Payroll compliance monitoring
- Incident investigations

6.6 Remediation

If modern slavery is suspected:

1. Investigate immediately
2. Suspend supplier or subcontractor
3. Provide worker support
4. Remove at-risk individuals from danger
5. Notify authorities if required
6. Terminate supplier if non-remediated
7. Strengthen controls to prevent recurrence

7. Effectiveness of Actions (Section 16(e))

Effectiveness is evaluated through:

7.1 Key Metrics

- % of suppliers completing due diligence
- % of staff trained
- % of subcontractors verified
- Number of non-conformances
- Incident reports
- Resolution timeframes

7.2 Monitoring Tools

- Compliance audits
- Supply chain mapping
- Procurement risk scoring
- Trend analysis



- Stakeholder feedback

7.3 Performance Indicators for This Period

- No identified or reported modern slavery incidents
- 100% right-to-work verification completion
- 94% staff training completion
- 87% supplier screening completion

8. Consultation (Section 16(f))

Just Focus Pty Ltd has **no controlled entities**.

This statement therefore does not require consultation with related entities.

Internal consultation occurred with:

- Directors
- Compliance Team
- HR Department
- Operations Management
- Procurement Officers

9. COVID-19, Economic & Emerging Risk Factors

We assessed external trends that may influence modern slavery risks:

- Increased demand for PPE during global supply disruption
- Labour shortages in cleaning industry
- Rising inflation pressures on subcontracted labour
- High-risk global manufacturing conditions
- Ongoing reports of forced labour in global electronics and PPE sectors

These factors reinforce the need for continued vigilance.

10. Future Commitments

Over the next reporting period, Just Focus will:

10.1 Strengthen Supplier Controls

- Expand supplier mapping across Tier 1 and Tier 2 suppliers
- Introduce an annual Supplier Self-Assessment Questionnaire
- Develop a supplier risk rating tool

10.2 Improve Worker Protections

- Enhance multilingual onboarding materials
- Increase frequency of ethical workforce checks
- Mandatory subcontractor compliance audits

10.3 Governance Enhancements



- Publish the Statement on our website
- Introduce dedicated Modern Slavery Officer role
- Increase reporting channels for workers

10.4 Industry Leadership

- Promote ethical procurement in the cleaning industry
- Participate in industry forums on modern slavery and human rights

11. Governing-Body Approval

This Modern Slavery Statement was approved by the Board of Directors of Just Focus Pty Ltd on:

Date: 1/12/2025

12. Signature

Signed



ZIHAAN ZIMZAR

Chief Business / Compliance Manager

Just Focus Pty Ltd

Date: 1/12/2025

