



QUAD SERVICES

MODERN SLAVERY STATEMENT 2022

Quad Services Pty Ltd
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Quad Services Pty Ltd (Quad) provides cleaning, security and building maintenance services across Australia and New Zealand. This Modern Slavery statement has been prepared per the Australian Modern Slavery Act 2018 (MSA) for the financial year ending 30 June 2022. This statement describes our actions to identify and address supply chain modern slavery risks during the period under review.

MODERN SLAVERY – THE PERSPECTIVE

Modern slavery involves the most severe forms of exploitation. It includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. Our approach is to identify and assess the risk and to take action to minimise these risks within our operations and supply chains.

OUR POSITION

At Quad Services, we foster an organisational culture that supports all internationally recognised human rights and ethical sourcing practices and seeks 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.

Quad is committed to developing and maintaining systems and processes to avoid involvement in modern slavery or human trafficking. Quad opposes any human rights violation. We recognise that our corporate and social responsibilities apply to our activities and those within our supply chain.

As part of our commitment to continuous improvement of our processes, we continue to invest time and resources to reduce the risk of modern slavery in our operations and supply chain, develop appropriate controls, and take appropriate action if modern slavery is identified within our operations or supply chain.

Our approach to addressing modern slavery risks in FY2021-22 has focused on:

- Continuing with awareness training for Management and staff,
- implementation of software to assist with identifying our risks
- undertaking risk assessment,
- reviewing Quad's policies, and
- engaging with suppliers.

Mandatory Criteria One and Two:

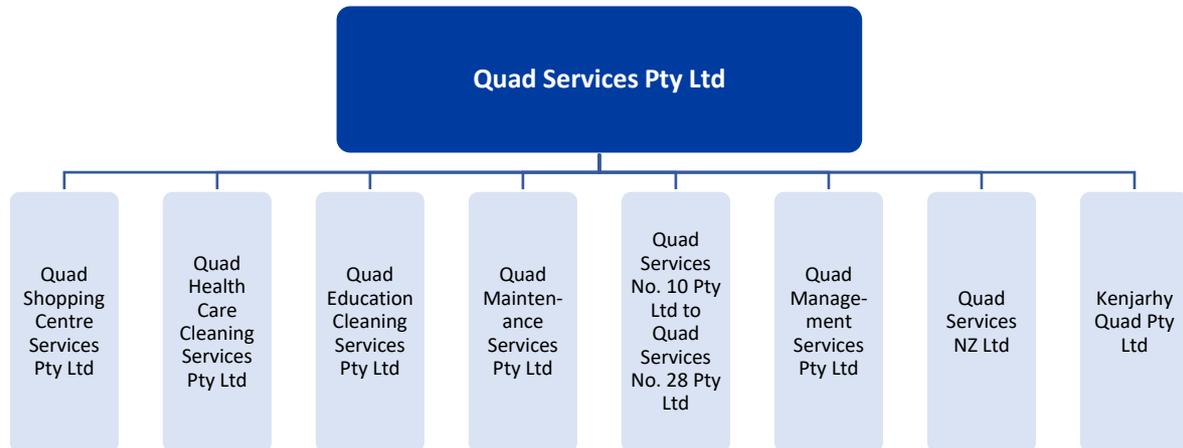
Identify the reporting entity and describe its structure, operations, and supply chains

THE QUAD COMPANY STRUCTURE

Quad Services Pty Ltd, ABN 58 000 308 592, is a privately owned Australian Company registered in New South Wales. Our Head Office is located at 12 Carlotta Street, ARTARMON NSW 2064.

Quad owns and controls several other entities for employment, administrative, and financial purposes. Quad operates services in New Zealand and is part of a joint venture indigenous entity, Kenjarhy Quad Pty Ltd.

Across the group, a standard set of policies, procedures, and systems is in place and tailored to local requirements (where required).



Quad is a member of the following organisations:

- Australian Property Council
- Building Service Contractors Association of Australia
- Building Service Contractors of New Zealand
- Australian Security Industry Association Ltd
- Facilities Management Association
- Green Building Council of Australia
- Clubs NSW
- Supply Nation

ABOUT QUAD

Formed in Australia in 1972, Quad initially provided cleaning services in the North Shore area of Sydney. By the 1980s, Quad had developed into a significant provider of cleaning services in the Sydney Metropolitan area. Since then, we have become a leading provider of cleaning and associated building services in Australia and New Zealand, with \$100M+ in turnover, 2200+ skilled, trained, and

vetted cleaning, security, and maintenance personnel, more than 50 experienced field-based management staff, 700+ contracts, and offices in all Australian states and territories and New Zealand.

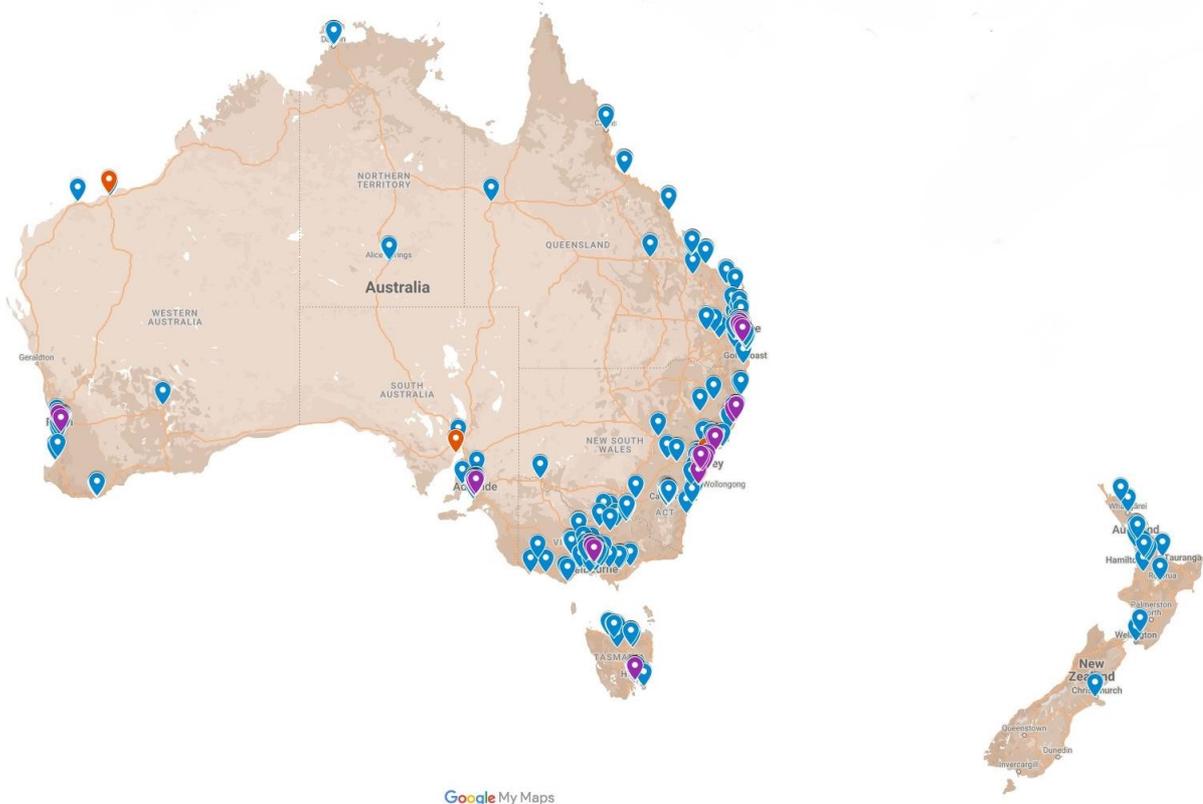
Quad is certified against the following standards:

- Quality Management System ISO9001
- Environmental Management System ISO14001
- Occupational Health and Safety Management System ISO45001

Our mission is to help our clients improve their facilities' safety and environment quality by delivering world-class security, cleaning, and associated services.

Operations and Supply Chain Map

Australia and New Zealand



OPERATIONS AND SUPPLY CHAIN

The Quad operations structure consists of operations teams responsible for designated geographical areas. By having a limited area to cover, our operations teams can more closely monitor activities on the ground and facilitate the application of Quad policies at the coalface of our operations. As the team managing our services at the site level, they play an important role in identifying and responding to potential instances of Modern Slavery practices in our service delivery.

The Quad supply chain consists of suppliers based within Australia. However, some of the items supplied to Quad are manufactured overseas. Our mapping process has already identified that some products are obtained from high-risk regions (according to the Global Slavery Index).

Quad suppliers must undertake a rigorous registration process at the commencement of the supply of services. Our compliance team coordinates this process. Service suppliers are required to provide regular updates.

Our actions in the FY2021-22 reporting period are covered later in this statement.

Our approach

At Quad, our Modern Slavery Committee guides and articulates our approach to modern slavery risks for our team members and stakeholders. Our Modern Slavery Committee is further supported by:

- Code of conduct
- Supplier code of conduct
- Policies and procedures, including Human Rights, Grievance and Modern Slavery
- Remediation processes
- Education and training for all our team members

Mandatory Criterion Three:

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls

POTENTIAL RISKS OF MODERN SLAVERY

Quad has continued to build on our previous years' risk assessments for our operations and supply chain. We understand and appreciate that through our business activities (our operations or supply chain), Quad may:

- Cause
- Contribute to, or
- Be directly linked to modern slavery

OUR OPERATIONS

In Quad's assessment, there is a greater risk of modern slavery in our supply chain than in our direct operations. Our formal employment processes within our operations lessen (but unfortunately do not eliminate) the risk of modern slavery practices in our employee engagement process.

From an employer perspective, our formal recruitment and onboarding process minimises the risk of modern slavery. However, as applicants for positions within Quad come from various sources, including referrals, there may be undesirable practices that are not identifiable, except by whistleblowing, confidential reporting, or independent third-party auditing. In this regard, Quad has a whistleblowing policy and a confidential reporting facility.

Some of the potential risks identified in our operations include:

- Maturity level of our service suppliers varies, as does their awareness of relevant industrial laws
- English as a second language in both our workforce and supplier workforce
- Risk of service suppliers not complying with applicable employment laws
- Awareness of the difference between independent contractors and employees
- Service suppliers not providing a safe workplace
- Placing expectations to deliver services that would place workers at risk

OUR SUPPLY CHAIN

During the reporting period, Quad partnered with Informed365 to improve our supply chain assessment and reporting. Quad recognises that additional support is needed concerning mapping our supply chain beyond the tier 1 level; this was the primary driver for the partnership.

While most of our tier 1 suppliers are in Australia, many other suppliers contribute to our supply chain by providing goods and services to our direct suppliers.

This multi-layered supply chain spans many countries, and we recognise the potential risk of labour exploitation across the globe, with risks higher in certain geographies and local contexts.

We are actively working with our suppliers to understand their approach and, where possible, influence their methodology to address the risks of modern slavery through our robust processes.

Building on the risks we have previously identified, risks in our supply chain include the following:

- Our suppliers are at different levels of maturity and understanding of the risks of modern slavery
- Suppliers believe that they are complying with industrial or safety laws, but gaps exist
- Placing expectations to deliver services that would place workers at risk
- Arrangements that may be dubious
- Suppliers not providing a safe workplace

We apply these risk factor considerations to our ongoing operations and to all our suppliers with whom we have a direct relationship.

Mandatory Criterion Four:

Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes

KEY AREAS OF ACTION IN FY2021-22

Like many other businesses, Quad Services continues to be impacted by the lingering effects of the pandemic. However, with the change in direction at all levels of the Government, we see this becoming of less concern over the short term.

During the reporting period, Quad took the following actions:

- Partnered with Informed365 to provide a platform to assist Quad in managing our supply chain and Modern Slavery Act compliance
- Joined the Supply Chain Sustainability School
- Updated our Human Rights policy to reflect the United Nations Universal Declaration of Human Rights and Declaration on the Rights of Indigenous Peoples
- Continuing to raise awareness about the Modern Slavery Act requirements with our people and suppliers to help them identify and manage modern slavery risks in our business operations and supply chains via:
 - Regularly communicating with our internal teams and suppliers
 - Providing training to our operational teams and leaders about the risks of Modern Slavery, our procedures to raise concerns and our actions to eliminate or remediate
 - Engaging with our suppliers about their requirements when partnering with Quad
 - Creating specific information posters raising awareness about Modern Slavery and our grievance processes
- Increasing our understanding of modern slavery risks across our operations and supply chain via:
 - Engaging with subject matter experts regarding Modern Slavery
 - Attending webinars and other educational activities about Modern Slavery
 - Regular Quad Modern Slavery committee meetings to discuss and consider Quad's actions to mitigate the risk of Modern Slavery
- Updating and embedding our other processes and policies to include references to Modern Slavery and Human Rights where appropriate
- We have also continued to:
 - Map our supply chains
 - Update our supplier onboarding due-diligence arrangements to include modern slavery considerations
 - Respond to and participate in client-initiated modern slavery reviews/assessment projects
 - Liaise with CAF (Cleaning Accountability Framework) to obtain pre-qualification

ADDRESSING MODERN SLAVERY RISKS

Quad has taken steps to mitigate the risk of modern slavery in our operations and supply chain. We continue to engage with our largest suppliers and educate our local suppliers, including those not required to report under the current Modern Slavery Act.

For this FY2021-22 reporting period, our actions and effectiveness are described below:

Consultation

We recognise that the cleaning industry is still a higher-risk sector with potential exposure to modern slavery practices. Consultation with our largest suppliers and clients continues. In line with the stringent requirements of our larger clients, the knock-on effect is that Quad is broadening its approach to consultation and methods used to collect information.

Partnering with Informed365 should enhance our ability to capture information.

Policies

Our supplier code of conduct has undergone further refinement during the reporting period.

Policies and procedures are regularly reviewed to ensure they comply with applicable legislation. Training for these policies and procedures is provided to all our employees.

During our review, we have concentrated on ensuring policies are written in plain English.

Contracting

Quad has included appropriate clauses in our supplier agreements. Our contractor onboarding documentation has been updated to reflect Quad's position on Modern Slavery and the contractors' requirements to comply.

All new suppliers are provided with our new onboarding details. We continue to bring our existing contracts up to this standard.

Training

Our current employee induction for our operational staff includes our actions to reduce the risk of Modern Slavery, processes to report and remediation steps.

Quad Services requires that all employees undertake training in awareness of modern slavery. Our leadership team undergoes further training on their responsibilities and how to mitigate the risk of modern slavery.

Our Compliance team continues to engage and deliver training to our suppliers, with Modern Slavery being part of that training. Our internal training program for our leaders is delivered through our eLearning partner, Sentrion.

Whistleblowing

Quad has a mechanism for employees, clients, and contractors to raise concerns. These concerns may be raised anonymously if required. Our dedicated confidential whistleblowing reporting facility is monitored by executive management daily.

An external third party is retained where concerns raised require external investigation or remediation.

Mandatory Criterion Five:

Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks

MEASURING EFFECTIVENESS

Quad regularly assesses conformity with all our policies and procedures, including checking compliance with our supply processes.

Quad's actions to mitigate the risk of modern slavery are subject to review by our Modern Slavery Committee.

For this reporting period, Quad did not identify any instances of modern slavery directly associated with our operations. No clients or suppliers raised modern slavery concerns.

Further, no modern slavery-related problems were submitted by our employees.

OUR NEXT STEPS

To continually improve our approach, we are planning to undertake the following actions in FY2022-23:

Policy	<ul style="list-style-type: none">• Continue to review and update• Invest in software to support our training and eLearning
Engagement	<ul style="list-style-type: none">• Consult/engage with our suppliers and our clients
Risk	<ul style="list-style-type: none">• Review the risk profile of our supply chain• Invest in software to support our consultation and risk assessment
Training	<ul style="list-style-type: none">• Act on findings to reduce/eliminate modern slavery risks
Communicate and report	<ul style="list-style-type: none">• Communicate with staff, clients, and suppliers; report on findings and progress
Remediate	<ul style="list-style-type: none">• Work with the relevant parties to remediate any incidence of modern slavery practice

Mandatory Criterion Six:

Describe the process of consultation with any entities the reporting entity owns or controls

Quad has a Modern Slavery Committee to guide and support our response to Modern Slavery. The Committee meets regularly throughout the year.

To prepare this joint statement, we engaged with each of the reporting entities covered by this statement and consulted the entities we own or control.

APPROVAL

This statement was approved by the principal governing body of Quad Services Pty Ltd on 12 December 2022.

A handwritten signature in black ink, appearing to read 'Andrew Yardley', with a long horizontal line extending to the right.

Andrew Yardley

Chief Executive Officer