



**GJK FACILITY SERVICES**  
MODERN SLAVERY AND  
HUMAN TRAFFICKING  
STATEMENT  
1 July 2023 - 30 June 2024



FACILITY SERVICES



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# INTRODUCTION

This is G.J. and K Cleaning Services Pty Ltd (“GJK Facility Services”) fourth Modern Slavery Statement, in accordance with the Australian Modern Slavery Act of 2018 (Cth) (“Act”). GJK Facility Services is the reporting entity under the Act and is reporting for and on behalf of its subsidiaries, controlled entities and managed JV partners: GJK Facility Services NZ Limited, Systemcare Australia Pty Ltd, Australian Retail Group Pty Ltd. As GJK Facility Services only has a 49% interest in Netronix Pty Ltd (trading as Killara Services), they are not covered in this Statement.

The purpose of this statement is to delineate the progression of our strategy in ensuring that GJK Facility Services maintains robust frameworks and procedures to mitigate the potential occurrence of modern slavery within our business operations and supply chain.

We acknowledge that slavery and human trafficking manifests in various forms, encompassing slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruitment for labour or services. Our unwavering dedication is to operate ethically, contributing to the global effort to eradicate modern slavery. Our commitment to upholding and promoting human rights aligns with the United Nations’ Guiding Principles for Business and Human Rights, as well as Goal 8 of the United Nations Sustainable Development Goals, which focuses on decent work and economic growth.

We are acutely aware that addressing the risks associated with modern slavery is a multifaceted and formidable undertaking, and our response will continue to evolve. We remain dedicated to enhancements through our vigilant due diligence and remediation processes, taking action as identified in our ongoing pursuit of eradicating modern slavery.

# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

## OUR STRUCTURE

GJK Facility Services originated in 1985 as a privately-held commercial cleaning enterprise. Today, we have evolved into experts in the cleaning sector, catering to Commercial, Government, Educational, Transport, and Healthcare facilities, extending our cleaning and related support services to clients across Australia and New Zealand.

Our primary suite of facility services encompasses Cleaning, Restoration, Grounds and General Maintenance, complemented by ancillary services such as Waste Management, Pest Control, Hygiene, and Consumable Supply. These services are delivered through our in-house workforce and service partners.

In the reporting period, GJK Facility Services ventured into a 50/50 joint partnership with The Australian Retail Group Pty Ltd and Systemcare Australia Pty Ltd. Additionally, we maintain full ownership of GJK Facility Services NZ Limited and 49% stake in Netronix Pty Ltd (trading as Killara Services)

While this statement pertains specifically to GJK Facility Services, we recognise our responsibility to identify potential modern slavery risks within the entities mentioned above and to report on the measures taken to address these risks.

### G.J. and K Cleaning Services Pty Ltd ACN 006 418 908

Reporting entity under the Act.



#### GJK Facility Services NZ Limited NZBN 9429046340313

100% Ownership

Our business in New Zealand delivering cleaning, waste and hygiene services to our customers.



#### Australian Retail Group Pty Ltd ACN 667 055 094

50% Joint Venture

The Australian Retail Group deliver retail cleaning, infection control and hygiene, waste management, specialised cleaning and pest control services to retail and commercial industries.

*\*\* Established but dormant during reporting period*



#### Systemcare Australia Pty Ltd ACN 668 891 138

50% Joint Venture

Systemcare Australia deliver critical environment cleaning and technical cleaning services.

*\*\* Established but dormant during reporting period*



#### Netronix Pty Ltd (trading as Killara Services) ACN 619 661 960 49% Joint Venture

Killara Services is a Supply Nation accredited Indigenous business delivering cleaning services and indigenous advice; cultural awareness training and development of Indigenous peoples in the community to their customers.

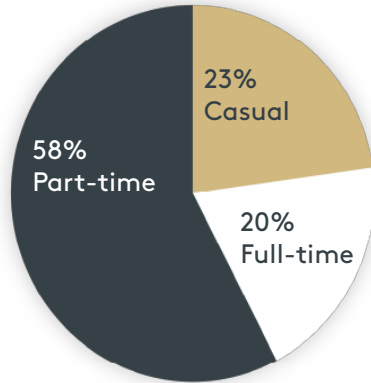
*\*\* Not reporting on Killara in this Statement*

## OUR OPERATIONS

GJK Facility Services remains a privately owned Australian company, headquartered in Melbourne. We boast a workforce of 2,325 individuals spread across Australia and New Zealand.



**GJK EMPLOYEES**  
breakdown



Executive	6
Management	86
Support Staff Cleaners	49
<b>Total</b>	<b>2184</b>

**51%**

of our employees identify as female

**49%**

of our employees identify as male

**21**

of our employees identify as Aboriginal and Torres Strait Islander people

## OUR SUPPLY CHAIN

### MAIN CATEGORIES OF SPEND



### TOP 5 CATEGORIES OF SPEND

1. Subcontractors
2. Waste removal
3. Consumables
4. Grounds and garden services
5. Hygiene services

**74%**

of total FY24 spend

**1217**

active suppliers and service partners in our supply chain

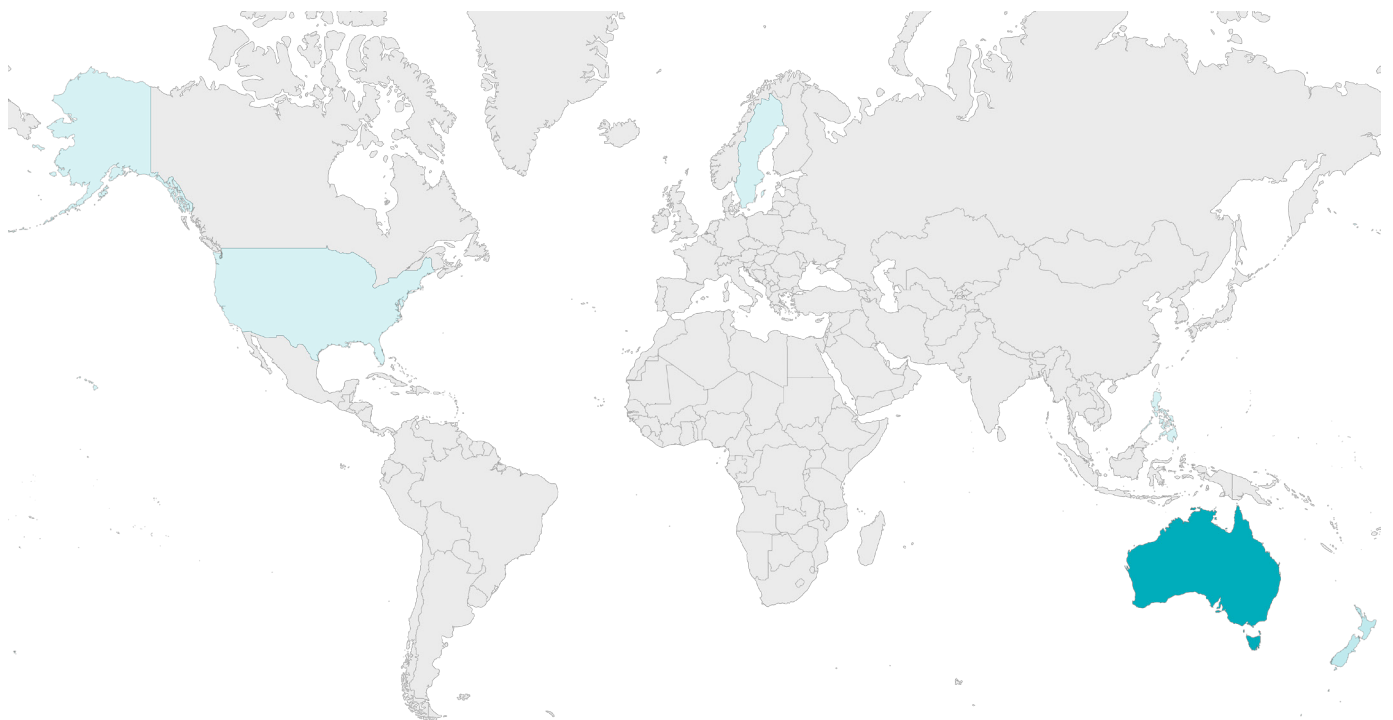


### TIER 1 SUPPLIERS - COUNTRIES OF OPERATION



### TIER 2 SUPPLIERS - COUNTRIES OF OPERATION

The map shading below highlights the volume of suppliers operating across the different countries. The darker the colour, the more suppliers operating in that country.



# IDENTIFYING OUR MODERN SLAVERY RISKS

## MODERN SLAVERY

- Worker cannot refuse or cease work because of coercion, threats or deception. Worker may also be deprived of personal freedom.

## DANGEROUS OR SUBSTANDARD WORKING CONDITIONS

- Worker can refuse or cease work but doing so may lead to detriment.
- Worker is not paid fairly and does not receive some or all entitlements.
- Worker may be required to work excessive hours.
- Workplace is unsafe.

## DECENT WORK

- Workers' rights respected.
- Worker free to refuse or cease work.
- Worker paid fairly (at least minimum wage).
- Workplace is safe.

Source: The Commonwealth Modern Slavery Act 2018  
Guidance for Reporting Entities

GJK Facility Services recognises addressing modern slavery and human rights cannot be treated in isolation; they are interconnected issues that demand a comprehensive approach. Modern slavery, in alignment with the Australian Government's definition, is a form of serious exploitation that involves coercion, threats, or deception to undermine and deprive individuals of their freedoms. We acknowledge that the severity of modern slavery exists at the severe end of the spectrum, but we also understand the less severe forms of exploitation, especially those related to dangerous or substandard working conditions, should not be dismissed, as the two can coexist (and are often related), and can serve as red flags for potential modern slavery.

To address modern slavery, we have adopted an inclusive approach, recognising the continuum between different forms of exploitation. By understanding the connections between severe exploitation and less severe working conditions, we are better equipped to evaluate and address modern slavery risks. This approach again underscores the importance of not isolating the issue of modern slavery but instead considering it in the broader context of human rights concerns.

This reflects a dedication to combating exploitation at various levels and fostering a workplace environment that upholds and respects human rights.

## UNDERSTANDING OUR RISK PROFILE

GJK Facility Services acknowledges our modern slavery risk profile is dynamic and will undergo ongoing changes over time as we evolve our response to modern slavery.

We evaluate the risks of modern slavery within both our operations and supply chain by employing a diverse range of tools and resources, including the Global Slavery Index. Our assessment takes into account specific risk factors related to geography, industry, product, and individual suppliers.

Using the above, and our own ongoing internal review of our operations and supply chain, has helped us understand our potential modern slavery risks and the control mechanisms we need to have in place to reduce these potential risks in our operations.

## POTENTIAL RISKS IN OUR SUPPLY CHAIN

SECTOR AND INDUSTRY RISKS	PRODUCT AND SERVICES RISKS	GEOGRAPHICAL RISKS
Cleaning, Security, Textiles, Property, Building	Services procurement - outsourcing Uniforms - textiles Offshore outsourcing	China, Asia, Philippines
MODERN SLAVERY RISKS	MODERN SLAVERY RISKS	MODERN SLAVERY RISKS
Non-compliance with labour standards, including health and safety, working hours, wages, forced labour, child labour and freedom of association	Non-compliance with labour standards, including health and safety, working hours, wages, forced labour, child labour and freedom of association	Forced labour / child labour and human trafficking



## OUR MODERN SLAVERY RISKS

We understand our modern slavery risk profile is dynamic, and can change over time. This evolution will occur as we expand our business, collaborate with different suppliers, or as our suppliers or business partners change their suppliers and where their products are manufactured or sourced from.

Additionally, external influences, such as inflation, the geographic location of our service partners, labour shortages and modifications in visa regulations, can significantly impact our risk profile. For instance, recent restrictions imposed on student visa holders might heighten the risks of exploitation, through underpayment or no payment of long service leave entitlements.

In certain scenarios, like our operations in remote regions, our capacity to select alternative service partners or closely monitor their practices may be limited. On a broader scale, global factors, such as the laws of various countries or conflicts, can also affect our modern slavery risk profile.

To mitigate these risks, we employ a comprehensive approach that includes our iPro<sup>1</sup> pre-qualification assessment, an annual iPro Modern Slavery Questionnaire, and third-party audits. To-date, these mechanisms have enabled us to proactively identify and address potential modern slavery risks in our operations and supply chain. More information on how we mitigate these risks is outlined in the section on "Managing Our Modern Slavery Risks".

## IDENTIFIED RISK FACTORS

When assessing human right or modern slavery risks within business operations and supply chain, we identified the following risk factors.

### AREAS OF RISK AND VULNERABILITIES



Reliance on temporary/international students



Subcontracting of services



Isolation of workers



Reliance on lower skilled labour

### TYPES OF POSSIBLE EXPLOITATION



Underpayment



Excessive working hours



Dangerous/substandard living or working conditions



Retention of identity documents

1. iPro Software is an Australian-based company specialising in assessment and management solutions for Modern Slavery, ESG, CSR, risk and compliance. GJK Facility Services uses iPro for vendor compliance and modern slavery.

**GEOGRAPHICAL RISKS**

Modern slavery can occur in any country, including Australia, but it is more prevalent in specific countries, as highlighted by the Global Slavery Index. These disparities in prevalence can be attributed to a range of risk factors, including the effectiveness of labour rights protection, socio-economic factors like poverty, weak rule of law, corruption, displacement, the presence of a significant migrant workforce, and the consequences of conflicts and natural disasters.

Assessing modern slavery risks based on geographical factors is complex as some suppliers operating in high-risk countries may have more robust risk management protocols in place compared to their counterparts in lower-risk countries. This can mitigate their overall risk profile. Additionally, suppliers in one country might rely on inputs or services from another country, which can alter their risk profile.

To enhance our understanding of the companies from which our suppliers source their products in these high-risk geographic areas, we will be collaborating closely with them in FY25 to undertake a thorough review by product to understand where the product is being manufactured, where raw material is being sourced and the treatment of their workers.

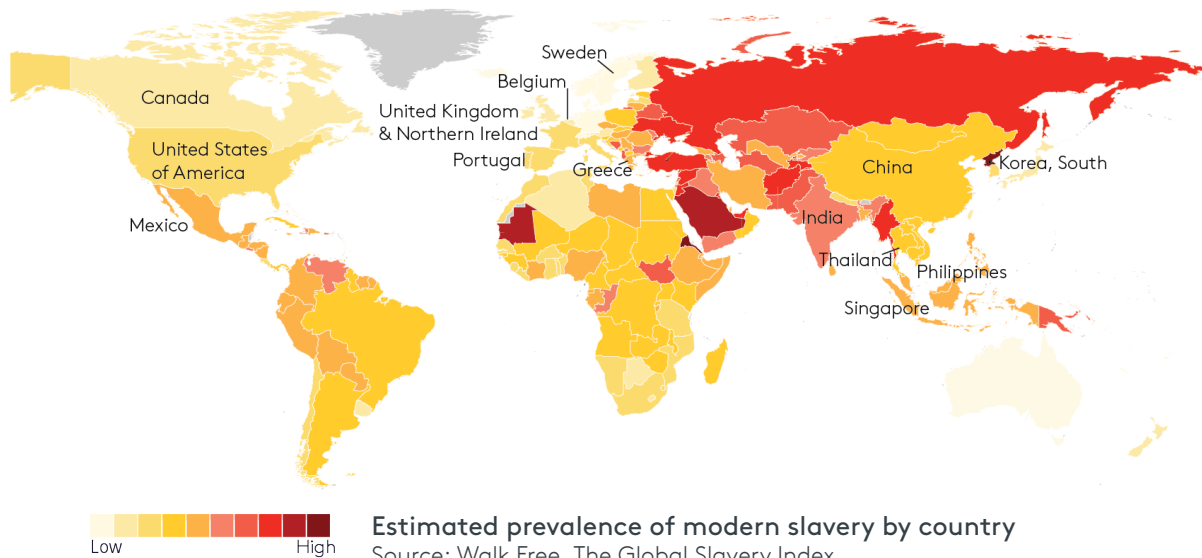
For instance, we’ve identified that our cleaning supplier in Australia sources their supplies from China, Italy, Germany, Asia, and the USA. Notably, both China and Asia are considered high-risk regions for modern slavery and human trafficking. Operating in the wholesale and trade sector in China exposes our supplier to the following potential risks:

- Pronounced exposure to forced labour, Modern Slavery, and other human rights abuses.
- Weak disclosure requirements and norms, which fail to capture or enable firms to hide environmental degradation and substandard sustainability practices.
- Insufficient intellectual property protections.
- Overzealous pursuit of central and provincial government policy targets, which can undermine product quality, lead to non-existent or non-viable “white elephant” entities, or furnish “green” designation for undeserving projects.
- Domestic political risks, including improper awarding of licenses; politically exposed or vulnerable partners; misalignment with local, provincial, central government aims.
- Geopolitical risks, including supply of sensitive or prescribed goods; affiliation with sanctioned parties; exposure to US-China decoupling efforts; “home country” relations with China.

The below map illustrates the inherent risks associated with each country, encompassing factors such as forced labour, national labour laws, freedom of association, workplace safety, child labour, wages, working hours, discrimination, gender equality, employment stability, labour standards and ethical business practices. This map visually shows the countries where our suppliers are sourcing their products. It also highlights our offshore shared services employees who are based in the Philippines.

This consequently exposes GJK Facility Services to the potential risk of being associated with and inadvertently contributing to instances of modern slavery in these areas.

**GEOGRAPHIC RISK FOR GJK SUPPLIERS BEYOND TIER 1**



### UNITED NATIONS GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS (UNGPs)

Within The Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities, the government recommends that businesses draw on the UNGPs to explain their modern slavery risks.

The UNGPs represent the worldwide benchmark for averting and managing the potential harm to human rights associated with business operations. It offers guidance on how a company should respond depending on its level of involvement in the harm - whether it has caused, contributed to or is directly associated with the harm.

- **Cause:** This pertains to situations where a businesses’ own activities directly lead to the occurrence of modern slavery practices.
- **Contribute:** This category encompasses scenarios in which a businesses’ operations or actions within its supply chain have the potential to contribute to modern slavery. This contribution can occur through acts or omissions that either enable or encourage slavery.
- **Directly Linked:** This refers to instances in which a company’s operations, products, or services may have a connection to modern slavery through the activities of another entity with which it maintains a business relationship.

<p><b>CAUSE</b></p>	<p>A business may cause modern slavery or human rights harm where its own business activities directly result in modern slavery occurring.</p>	<p>Facility service companies could <b>cause</b> modern slavery in limited circumstances.</p> <p>GJK Facility Services consider we have taken steps to mitigate any potential risks that we could cause through our work practices and applied minimum working standards.</p>
<p><b>CONTRIBUTE</b></p>	<p>A business may contribute to modern slavery or human rights harm where its businesses’ operations or actions within its supply chain have the potential to contribute through acts or omissions that either enable or encourage modern slavery.</p>	<p>Facility service companies may play a role in <b>contributing</b> to modern slavery through various means. This might involve setting unrealistic service delivery expectations or implementing cost-cutting measures that encourage suppliers to engage in modern slavery. Additionally, when a facility services company overlooks evidence or purposefully ignores the fact that a supplier is involved in modern slavery, it further contributes to this unethical practice.</p> <p>At GJK Facility Services, we have put in place an extensive array of processes aimed at effectively managing the risks associated with modern slavery in our supply chain, such as our iPro pre-qualification assessment, an annual iPro Modern Slavery Questionnaire, and third-party audits. We firmly believe that these measures are instrumental in reducing the possibility of our unintentional contribution to modern slavery.</p>
<p><b>DIRECTLY LINKED</b></p>	<p>A business may be directly linked to modern slavery through its operations, products or services having a connection through the activities of another entity of which it maintains a business relationship with.</p>	<p>GJK Facility Services believes our greatest exposure to modern slavery is being <b>directly linked</b> to modern slavery. This could potentially be through our use of third-party contractors to deliver our services and working in known high risk sectors: cleaning and property and construction. Both sectors are known for exploitative people practices such as forced or unpaid work, unsafe conditions and work conditions, due to the use of low skilled, migrant workers and/or international students on working visas. Additionally, our supply chain, where we are procuring products manufactured overseas (tier 2,3 and below) due to being in geographical risk areas; China, Asia.</p> <p>To mitigate this risk, through FY24, we will work in partnership with the Australian Retail Group, Systemcare Australia, Killara and our third party contractors to ensure they have the necessary mechanisms to mitigate potential modern slavery risk within their operations and supply chain. For our suppliers, we will work with them to gain a greater understanding of the companies they are sourcing their goods from and what processes they have in place to manage the risk of modern slavery.</p>

## MODERN SLAVERY RISKS LINKED WITH THE CLEANING SECTOR

As in our previous Statements, GJK Facility Services recognises the cleaning sector as having our highest modern slavery risks due to the use of low-skilled labour and outsourcing to third-party contractors, where there is reduced visibility and oversight of their practices.

To address this risk in FY24, we have been reducing the percentage of outsourcing of our cleaning labour by increasing our direct labour workforce, with the aim of consistently having 70% direct to 30% outsourcing. We are currently 65/35.

Additionally, the cleaning sectors reliance on international students which increased workers' vulnerability to exploitation. This has been further escalated with the governments introduction of work restrictions for student visa holders which restricts students to 48 hours of work a fortnight. These restrictions became effective in 1 July 2023 and therefore have fallen into our FY24 reporting period.

The introduction of this restriction increases the modern slavery risks of students being exploited by being paid off the books and below the minimum wage, losing the protection of industry award entitlements, such as leave and workers' compensation, putting them at personal risk. Through audits we have undertaken, we are already seeing student visa holders trying to circumvent these new restrictions by setting up ABN's, leaving themselves open to being potential exploited.

Financial pressures have also escalated as a result of the cost of living with increased costs in supplies /products and taxes, whilst customers are wanting same service at reduced costs. These pressures increase the risk of potentially being linked or contributing to modern slavery via our service partners through impractical service delivery expectations which may incentivise improper behaviour.

These identified risks will also be of concern for our joint venture partnership businesses since they are also involved in the cleaning sector.

We continue to recognise these and our business having an increased risk of potentially being linked to or contributing to modern slavery.

## MODERN SLAVERY RISKS LINKED WITH THE PROPERTY AND CONSTRUCTION SECTOR

In our previous statement, we noted the diversification of our service offering through our 50/50 joint venture with The Pro1 Group Pty Ltd (Pro1). This joint venture ended 1 July 2023 and GJK will no longer provide updates regarding the operations or performance of Pro1.

# MANAGING OUR MODERN SLAVERY RISKS

## OUR GOVERNANCE STRUCTURE, POLICIES AND MODERN SLAVERY FRAMEWORK

Our governance structure, policies, and modern slavery risk framework serve as the cornerstone of our approach to addressing modern slavery and wider human rights concerns. These frameworks establish clear lines of responsibility for managing modern slavery risks throughout our company, promoting a uniform and controlled response. Throughout the reporting period, our Risk Committee diligently monitored our efforts to combat modern slavery through quarterly meetings.

We continue to support and provide guidance to all our owned and controlled subsidiaries and JV partners as they continue to improve their controls around modern slavery.

## GOVERNANCE STRUCTURE

We have established a robust governance structure to oversee the management of our modern slavery risks across our operations and supply chain.

### FOUNDER AND MANAGING DIRECTOR

Responsible for the review and approval of our modern slavery statement. They receive monthly updates from the National HSEQ Manager via the CEO Report and provide governance over our modern slavery risks.

### RISK COMMITTEE

Responsible for overseeing the businesses' management of risk, compliance to legislation, and management of incidents. This also includes monitoring and reviewing our performance against our modern slavery risk framework, internal risk controls and reviewing our modern slavery statement prior to being submitted to the Managing Director.

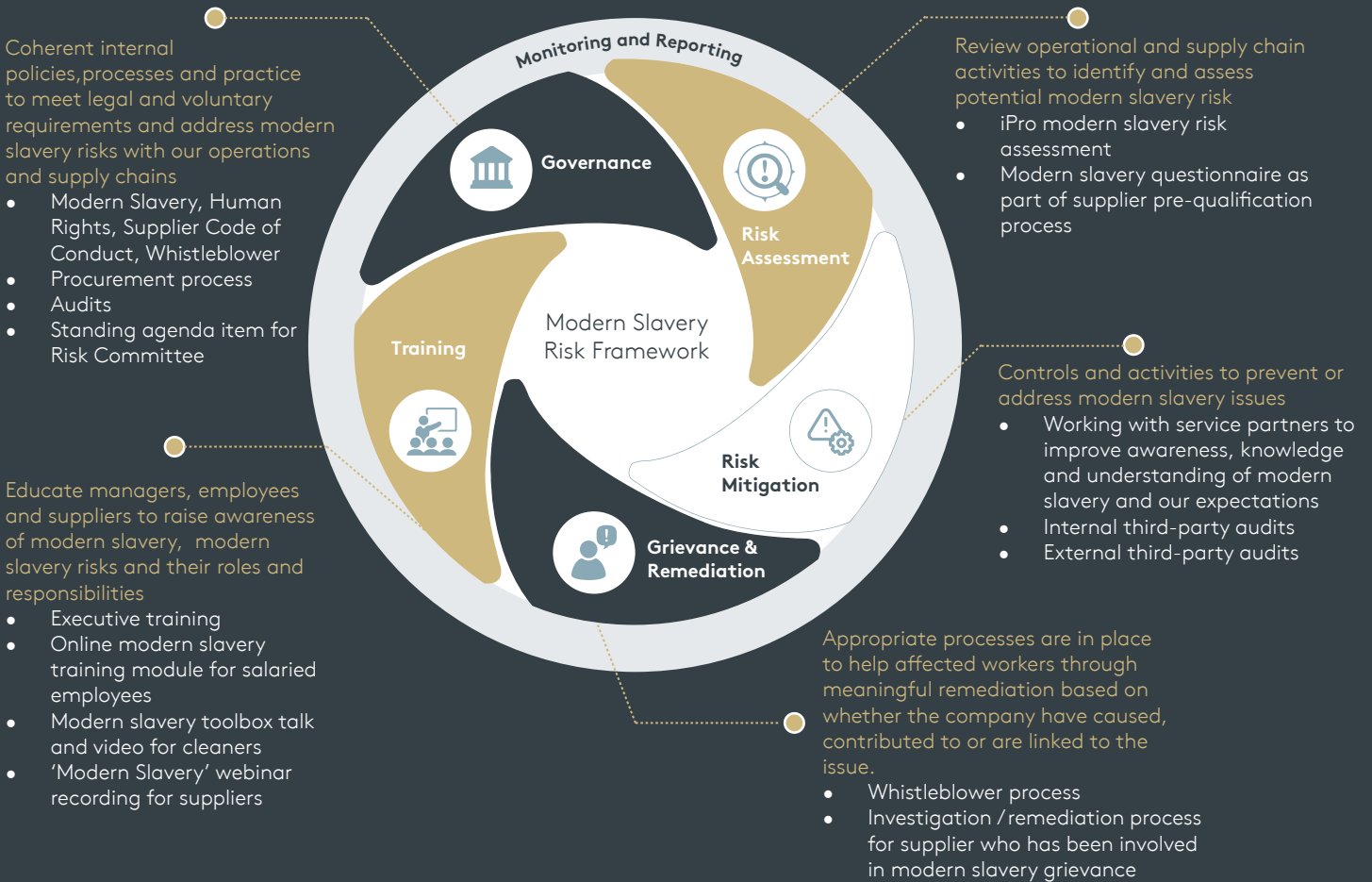
The Committee consists of the Chief Executive Officer, Chief Financial Officer, Director of Operations and Director People and Culture.

### CHIEF EXECUTIVE OFFICER AND EXECUTIVE TEAM

Responsible for overseeing the procurement of goods and services within their function area, ensuring their team members who manage relationships with suppliers adhere to the company's policies and processes.

## GJK FACILITY SERVICES MODERN SLAVERY RISK FRAMEWORK

We developed our modern slavery risk framework in FY22 and it provides a structured approach to identifying, managing and mitigating potential modern slavery risks within our operations and supply chain. The below diagram outlines the mechanisms we implemented in FY23 to do this.



## TRAINING

To ensure our employees and suppliers understand what modern slavery is, we have provided a range of training sessions.

### June 2023

Modern slavery training delivered to Executive Team to increase their understanding of Modern Slavery, the potential business risks, and the reporting requirements under the Act.

### June 2023

Online modern slavery module released to salaried employees via GJK Facility Services Learning Management System. Module covers, what modern slavery is, company's policies and processes to manage potential modern slavery risks, employee responsibilities to company's and reporting mechanisms.

This online module is now part of onboarding process for new salaried employees.

### September 2023

Two webinar sessions organised for suppliers to attend and learn what modern slavery is, why it is relevant to the cleaning sector, the red flags of Modern Slavery, steps for preventing harm, and our expectations when working with GJK Facility Services.

### November 2023

Training session organised for operational managers on what modern slavery is, why it is relevant to the cleaning sector, the red flags of Modern Slavery, steps for preventing harm. Session also covered discussion around findings from iPro risk assessment and reiterated GJK's expectations of suppliers regarding modern slavery.

### June 2024

Modern slavery training delivered to cleaners, including sub-contractor cleaners via online Toolbox Talk, video and quiz.

## OUR POLICIES AND PROCEDURES

Our accredited Integrated Management System remains equipped with policies and frameworks that underpin our everyday business activities, enabling us to adhere to the legal requirements governing our operations, including the Modern Slavery Act 2018 (Cth). Our policies and procedures apply to all subsidiaries and JV partners.

Our Supplier Code of Conduct, in conjunction with our Human Rights and Modern Slavery policies, has consistently fostered the ethical conduct we aspire to see throughout our operations and supply chains.

In line with our commitment to preventing human rights violations, we constantly review and enhance our processes and practices as part of our action plan.

Policy/ Procedure	Relevancy to modern slavery	Implementation and communication
<b>Modern Slavery Policy</b>	Our Modern Slavery Policy outlines our commitment to helping eradicate modern slavery and it also outlines the processes we have put in place to assess and mitigate modern slavery risks.	We publish this policy on our employee intranet. The policy is also included within our Modern Slavery training module, where employees are required to review and confirm their understanding of the policy when undertaking the mandated training.
<b>Human Rights Policy</b>	Our Human Rights Policy outlines our commitment to respecting and promoting human rights in accordance with the UN Guiding Principles on Business.	We make this policy available on our internal employee intranet.
<b>Code of Conduct</b>	Our Code of Conduct defines our business practices and establishes the expected standards of behaviour for our employees. The Code underscores our dedication to conducting business with ethics and integrity at the forefront.	We make this policy available on our internal employee intranet. Furthermore, as a standard procedure, we mandate all new employees to review and confirm their understanding of the Code of Conduct when they commence their employment with us. The duties and obligations outlined in the Code are restated in various other policies and training initiatives. In instances of significant violations of the Code of Conduct, these matters are promptly reported to our Risk Committee for further assessment.
<b>Supplier Code of Conduct</b>	Our Supplier Code of Conduct outlines expectations for suppliers, emphasising GJK Facility Services' commitment to combating modern slavery risks globally. We seek suppliers who share our dedication to transparency, ethics, and supporting corporate social and environmental responsibility.	The Supplier Code of Conduct is provided to all suppliers as part of our onboarding process. They are required to review and confirm their understanding of the Supplier Code of Conduct by signing a copy and returning a copy with their signed Contractor Agreement.
<b>Whistleblower Policy</b>	Our Whistleblower Policy outlines the procedures we've implemented to receive and handle reports concerning potential misconduct. This encompasses suspicions or instances of unethical, illegal, corrupt, fraudulent, or undesirable behavior, as well as concerns that may indicate a violation of our Code of Conduct. This policy also extends to complaints related to modern slavery.	We publish this policy on our employee intranet and it is also available on our external public website. The Whistleblower reporting channels are promoted within the Modern Slavery training material.

Policy/ Procedure	Relevancy to modern slavery	Implementation and communication
<b>Whistleblower Procedure</b>	Our Whistleblower procedure details the steps to follow to declare and manage reported incidents of potential modern slavery and protect the person reporting.	We publish this procedure on our employee intranet. Procedures and related documents are also referenced in on our Whistleblower Policy, with the expectation employees will review these in conjunction with the Policy.
<b>Response and Remediation Framework</b>	We have adopted Walk Free’s Response and Remediation Framework For Actual or Potential Cases of Modern Slavery to assist our Whistleblower Protection Officers when an actual or potential case of modern slavery or related labour exploitation has been identified.	We make this document available on our employee intranet. This document is also communicated and discussed during Whistleblower Protection Officers training.
<b>Procurement Policy</b>	Our Procurement Policy sets out our procurement principles concerning the acquisition of goods, services and/or works. One of these principles is ensuring sustainable procurement practices are considered from an environmental, social and economic perspective when procuring any goods, services and/or works.	We make this policy available on our internal employee intranet for managers responsible for purchasing to access.
<b>Procurement Procedure</b>	Our Procurement Procedure outlines our procurement process and considerations to be taken when assessing potential suppliers, including human rights and modern slavery.	We make this procedure available on our internal employee intranet for managers responsible for purchasing to access.



	ISSUES IN FY23	ACTIONS IN FY24
<p>Collaborate with associated entities of GJK Facility Services to identify and better understand potential modern slavery risks</p>	<p>In our FY23 Statement, we noted the ongoing risks linked to our 50/50 partnership with The Pro1 Group Pty Ltd, particularly because they operate within the property and construction sector, a field known for high risks of exploitative practices such as forced or unpaid labor, unsafe working conditions, and debt bondage. We also pointed out additional risks arising from the overseas sourcing of raw materials and Pro1's dependence on third-party contractors to deliver services to their customers</p>	<p>Effective 1st July 2023, GJK has sold its 50% share in The Pro1 Group Pty Ltd. As a result, GJK will no longer report or provide updates regarding the operations or performance of Pro1.</p>
<p>Robust assessment of suppliers /service partners we work with</p>	<p>In our FY23 Statement, GJK continued its decision to offshore several shared service roles to the Philippines through the staff outsourcing provider Satellite Office Solutions. Given the distance and our limited visibility into the working conditions, this presented a potential modern slavery risk to the business.</p>	<p>In FY24, we completed an ethical audit of Satellite Office Solutions' employment agreements with our offshore employees to ensure compliance with Philippine labor laws and that they were receiving the correct pay and entitlements. A representative from our business will visit our offshore employees in the Philippines in FY25 to review their working conditions. We will continue to work closely with Satellite Office Solutions and our offshore employees to prioritise their safety and well-being.</p>
<p>Collaborate, educate and raise awareness of modern slavery with our service partners</p>	<p>In our FY23 Statement, we recognised that our service partners had differing levels of understanding of modern slavery, with many being small to medium-sized cleaning businesses that fall below the \$100m reporting threshold for Modern Slavery. The iPro assessment highlighted the need for significant efforts to improve awareness, knowledge, and understanding of modern slavery among our service partners, as well as to ensure our expectations are clearly communicated and supported.</p>	<p>GJK continued its collaboration with a consulting firm with expertise in human rights, which delivered a training session covering the definition of modern slavery, its relevance to the cleaning sector, key red flags, prevention steps, and our expectations when working with GJK Facility Services. We then worked with the consulting team to host two webinar sessions based on this training, inviting our service partners to attend one of them. We are committed to continuing our efforts in partnership with our service providers to increase their awareness, knowledge, and understanding of modern slavery.</p>

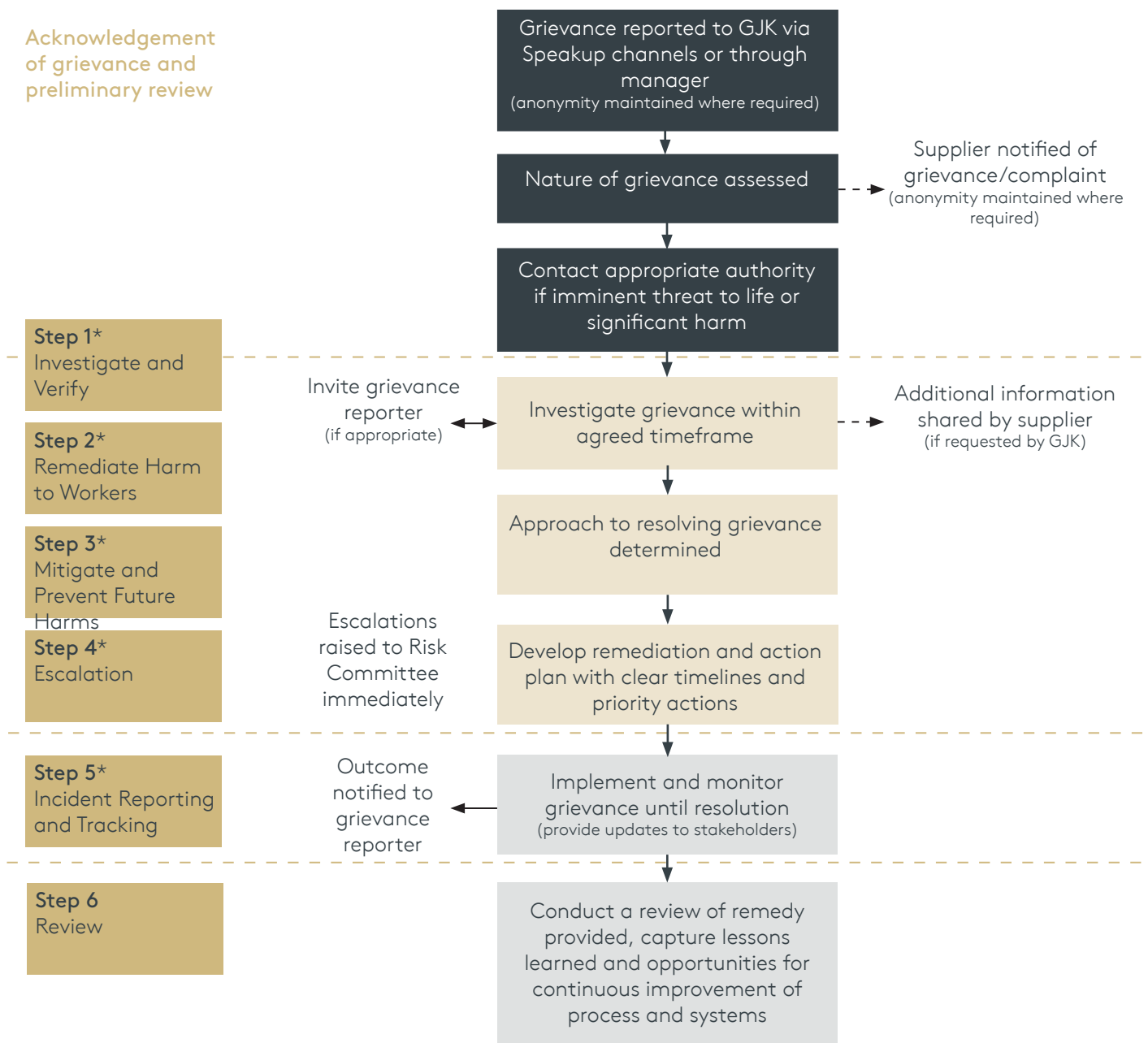
## MODERN SLAVERY GRIEVANCE MECHANISM AND REMEDIATION

Our modern slavery grievance mechanism is aimed at identifying modern slavery and other human rights abuses, allowing for their proper resolution. This mechanism is accessible by all affected parties, including our employees, contractors, suppliers, and supply chain workers - who are able to report incidents.

In line with our previous modern slavery statement, we've enhanced our grievance and reporting systems in FY24, introducing an additional procedure specifically addressing modern slavery grievances affecting suppliers. These enhancements align with the UN Global Compact's Implementing 'Effective Modern Slavery Grievance Mechanisms - A Guidance Note for Business'.

Additionally, we have adopted Walk Free's Response and Remediation Framework as a guide to follow when an actual or potential case of modern slavery or related labour exploitation occurs. The steps within this framework should be consulted during the modern slavery grievance and remediation process.

No modern slavery incidents were reported for FY24 reporting period.



\* Refers to the steps within Walk Free's Response and Remediation Framework that GJK Facility Services has adopted



## SPEAK UP

**P:** 03 9418 6938

**E:** [speakup@gjkfacilityservices.com.au](mailto:speakup@gjkfacilityservices.com.au)

A confidential email and phone channel, open to anyone covered by GJK's Whistleblower Policy where anonymity can be requested and personal details will not be shared.

## OUR APPROACH TO MODERN SLAVERY GRIEVANCE MANAGEMENT

We have amended our Whistleblower process in FY22 to include our modern slavery grievance mechanism. This is accessible to all potentially impacted stakeholders, including employees, contractors, suppliers, supplier workers, officers, and affected communities. Additionally, we may become aware of potential modern slavery incidents through various channels, including audits, supplier self-reporting, and information shared by third parties, such as unions or media reports.

How to report potential modern slavery incidents and other human right abuses is also detailed in our modern slavery training modules.

Our whistleblowing channel, *Speakup*, is accessible to affected individuals and stakeholders for reporting concerns regarding potential modern slavery or other human rights violations within our operations or supply chain. This channel offers anonymous reporting options. Any complaints received through this channel would be thoroughly evaluate and investigate for validity, before striving for a swift resolution, whilst keeping complainants informed throughout the process. This grievance mechanism is communicated via our training modules for employees, cleaners and service partners.

Should we identify a need for a remedy in accordance with the UNGPs, we may either offer it directly or collaborate with third parties such as medical support, counseling, temporary accommodation, specialist agencies, etc. In such cases, this would be discussed and agreed upon with the affected individual(s) or their representative to ensure assistance aligns with their specific needs.

## REVIEWING THE EFFECTIVENESS

GJK Facility Services understands an effective grievance mechanisms should be trusted, easily accessible, well-communicated, fair, transparent, and a source of ongoing learning and engagement. As such, we are continuously evaluating the effectiveness of our modern slavery grievance mechanism.

As part of this assessment, we have implemented actions, such as testing our own processes through the submission of test complaints. So far, our review has identified various areas warranting further attention. These include the need for enhanced promotion and education about available channels, as well as opportunities to further refine our processes.

# ASSESSING OUR EFFECTIVENESS

Effectiveness to GJK Facility Services means our processes and systems are functioning efficiently and effectively to prevent and address modern slavery within our operations and supply chain, and remediation is being delivered to victims where incidents are identified.

Evaluating our approach’s effectiveness involves assessing the various policies, processes and systems we have implemented. This includes evaluating the thoroughness of our modern slavery risk management framework, risk assessments to identify modern slavery vulnerabilities, supply chain traceability, monitoring and auditing effectiveness for ethical and labour standard compliance, reporting and grievance mechanisms, and training programs to enhance understanding and awareness.

Additionally, we assess our effectiveness through the modern slavery assessments and ethical audits our customers request from us and the number of corrective actions that may result from these audits.

For the reporting period, GJK undertook 4 customer requested Modern Slavery Questionnaires and 13 customer requested ethical audits, passing all 13 without any non-conformances.

	HOW WE ASSESS OUR EFFECTIVENESS	KEY OUTCOMES
<b>Our policy and governance framework</b>	<ul style="list-style-type: none"> <li>We routinely assess the suitability of our key policies, including conducting an annual evaluation of our Modern Slavery Risk Management Framework.</li> <li>Our policy and governance framework’s efficient execution is tracked through quarterly reports provided to the Risk Committee.</li> </ul>	<ul style="list-style-type: none"> <li>We reviewed our Contractor Agreement and identified the existing modern slavery clause needed to be more prescriptive.</li> <li>Re-training of Sourcing Team of supplier onboarding process after review of supplier onboarding identified Supplier Code of Conduct wasn’t being returned signed with Contractor Agreement.</li> </ul>
<b>Our risk assessment process</b>	<ul style="list-style-type: none"> <li>We continually monitor our modern slavery risk profile to ensure our understanding of modern slavery risk is fit for purpose.</li> </ul>	<ul style="list-style-type: none"> <li>Refined our understanding of potential modern slavery risks within our supply chain and also the level of maturity each of our suppliers is at with regards to modern slavery. This will help us identify who we need to work with and SME’s we may potential need to assist.</li> </ul>
<b>Our supplier due diligence</b>	<ul style="list-style-type: none"> <li>We continually monitor our modern slavery risk profile to ensure our understanding of modern slavery risk is fit for purpose.</li> </ul>	<ul style="list-style-type: none"> <li>23 new suppliers completed modern slavery risk assessment as part of onboarding processes.</li> </ul>
<b>Our grievance and remediation process</b>	<ul style="list-style-type: none"> <li>We assess the effectiveness of our grievances mechanism and remediation processes against the criteria set out in the UNGPs.</li> <li>Submission of test complaints to ensure their proper identification and handling.</li> </ul>	<ul style="list-style-type: none"> <li>Of the several tests undertaken during the reporting period, one found the mailbox to the Speakup channel had dropped out of the Whistleblower Protection Officer’s email box and another found the Speakup telephone number hadn’t been diverted to new Whistleblower Protection Officer after previous left the company.</li> </ul>
<b>Training</b>	<ul style="list-style-type: none"> <li>We assess the effectiveness of our training through employee engagement and completion of training.</li> </ul>	<ul style="list-style-type: none"> <li>Targeted training provided to our cleaners and service partner workers through Toolbox Talk format.</li> <li>38 new salaried employees undertook online training module with 77% completion rate.</li> </ul>

# FOCUS AREAS FOR FY24 AND CONTINUAL IMPROVEMENT

GJK Facility Services is committed to continual improvement as we evolve our response to modern slavery. We will achieve this from our own learnings and from external sources.

To-date our focus areas have been on identifying and addressing potential modern slavery risks, raising awareness through education and mitigating future modern slavery risks. We will be continuing this focus and expand to build stronger relationships with our service partners and suppliers.

FOCUS AREA	ACTIVITIES
 <p data-bbox="140 797 601 860">Identifying and addressing potential modern slavery risks</p>	<ul data-bbox="671 577 1473 943" style="list-style-type: none"> <li>• Continue undertaking yearly Modern Slavery Assessment of Service Partners, validating their control mechanisms to identify, assess and manage potential modern slavery risks.</li> <li>• Implement necessary steps to address any identified modern slavery risks.</li> <li>• Provide guidance and support to entities that we have ownership in to ensure they have the necessary control mechanisms in place to identify, assess, manage and mitigate modern slavery risks.</li> <li>• Implement an Ethical Audit Program.</li> </ul>
 <p data-bbox="173 1193 564 1256">Collaborate, educate and raise awareness of modern slavery</p>	<ul data-bbox="671 981 1477 1317" style="list-style-type: none"> <li>• Provide ongoing Modern Slavery training to our employees.</li> <li>• Engage with Service Partners to better understand how they are engaging with their employees and how we could potential support them.</li> <li>• Approach GJK customers to form partnerships to support increased knowledge and learnings for complex issues such as engaging very small SME's.</li> <li>• Collaborate in the sector more broadly to gain understanding, knowledge of modern slavery.</li> </ul>
 <p data-bbox="127 1637 609 1671">Mitigating future modern slavery risks</p>	<ul data-bbox="671 1332 1482 1839" style="list-style-type: none"> <li>• Undertake a deeper dive with our suppliers into their supply chain to gain a greater understanding of where products are being sourced and manufactured.</li> <li>• Continually review effectiveness of Modern Slavery Risk Management Framework and associated policies and procedures.</li> <li>• Engage with Service Partners and Suppliers to better understand.</li> <li>• Implement Modern Slavery Steering Committee with representatives from each of GJK's joint venture entities to meet quarterly and report quarterly to the Risk Committee.</li> <li>• Improve collaboration with vulnerable workers in our own operations and service partners to involve their voice/feedback in improving our systems, policies and grievance mechanisms.</li> </ul>
 <p data-bbox="145 2125 595 2188">Building stronger relationships with our service partners and suppliers</p>	<ul data-bbox="671 1971 1474 2145" style="list-style-type: none"> <li>• Engage with small SME Service Partners to better understand how we could potential support them through our own modern slavery control mechanisms.</li> <li>• Incorporate modern slavery as agenda item on Service Partner monthly meetings.</li> </ul>

## CONSULTATION PROCESS

We employ a coordinated approach to address the risks associated with modern slavery within our business. This involves close consultation and collaboration with various key functions within our business and other business entities we own or control in preparing this statement.

Draft versions of the statement underwent thorough review and final approval by members of the Risk Committee, GJK Facility Services' executive team and CEOs of our subsidiaries and the joint venture entities noted in this statement.

Our statement was also reviewed by an expert independent human rights consultant who also provided input into evolving our response to modern slavery in FY24. This process plays a crucial role in enhancing GJK Facility Service's procedures for managing and reporting on modern slavery risks.

In accordance with the requirements of the Act, this statement was approved by the Sole Director of G. J. and K Cleaning Services Pty Limited on 18th December 2024, and is signed by the Founder and Managing Director.



**George Stamas**  
**Founder and Managing Director**

18th December 2024

# APPENDIX A: COMPLIANCE WITH MODERN SLAVERY ACT REQUIREMENTS

This statement was prepared in accordance with the mandatory criteria set out in Section 16 of the Modern Slavery Act.

The following table indicates where mandatory reporting criteria can be located in this statement.

MANDATORY CRITERIA FOR MODERN SLAVERY STATEMENT	LOCATION OF INFORMATION
Identify the reporting entity.	Introduction - page 4 Our structure, operations and supply chains - page 5
Describe the reporting entity's structure, operations and supply chain.	Our structure, operations and supply chains - page 5-7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Identifying our modern slavery risks - page 8-12
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Managing our modern slavery risks - page 13-19
Describe how the reporting entity assesses the effectiveness of these actions.	Assessing our effectiveness - page 20
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	Consultation process - page 22



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