



**GJK FACILITY SERVICES**  
MODERN SLAVERY AND  
HUMAN TRAFFICKING  
STATEMENT  
**2019**



FACILITY SERVICES

# INTRODUCTION

This is the first Modern Slavery Statement for G.J. & K Cleaning Services Pty Limited (GJK Facility Services) and is made following the introduction of the Australian Modern Slavery Act 2018 (Cth).

The purpose of this statement is to outline our approach to ensure GJK Facility Services has robust frameworks and processes in place to minimise the risk of modern slavery occurring in our business operations and supply chain.

We recognise that slavery and human trafficking can occur in many forms including slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services. We are fully committed to operating responsibly to help eradicate modern slavery.

Our commitment to respecting and supporting human rights is aligned to the UN 10 Guiding Principles for Business and Human Rights and Goal 8; decent work and economic growth, of the United Nations Sustainable Development Goals.

# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

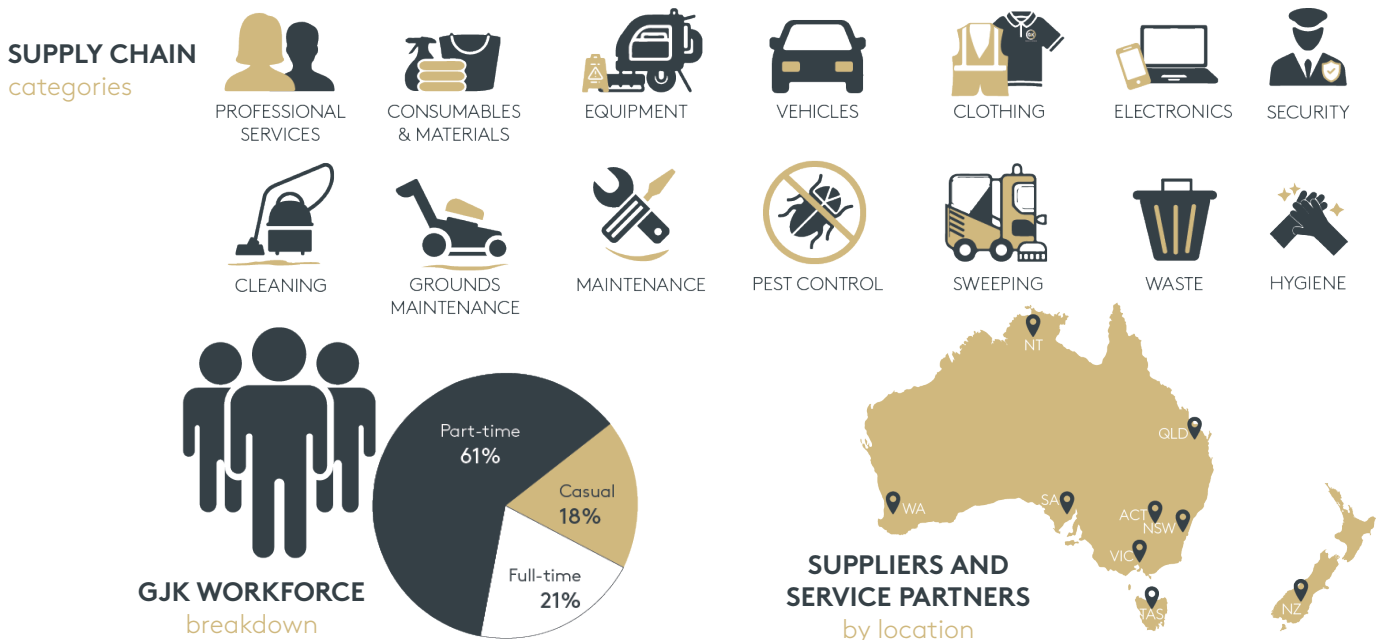
GJK Facility Services started as a small privately-owned commercial cleaning company in 1985.

Today we are specialists in cleaning Commercial, Government, Educational, Transport, and Healthcare facilities, providing cleaning and associated soft services to customers across Australia.

Our core facility service offering includes Cleaning, Restoration, Grounds & General Maintenance with support services including Waste Management, Pest Control, Hygiene, and Consumable Supply. These services are provided through our directly employed workforce and service partners.

GJK Facility Services is a privately owned Australian business with our Head Office based in Melbourne. We have a workforce of over 2,500 across Australia and New Zealand.

GJK Facility Services also controls GJK Facility Services NZ Limited with 100% ownership, controls GJK Window Cleaning Services with 75% ownership and owns 49% shareholding of Netronix Pty Ltd. All three noted businesses fall below the threshold requirements to provide a modern slavery statement and as such are not reporting entities.



STRUCTURE	MAIN OPERATIONS	SUPPLY CHAIN
 <p><b>G.J. &amp; K Cleaning Services Pty Ltd</b>                      ACN 006 418 908                      Registered Office:                      135 Cromwell Street, Collingwood,                      VIC, 3066                      Business Address:                      As above                      100% ownership</p>	<ul style="list-style-type: none"> <li>• Delivering cleaning, grounds, restoration, maintenance and facility support services to our customers</li> <li>• Sales and marketing</li> <li>• Finance and commercial</li> <li>• Technology</li> <li>• People and Culture</li> <li>• Safety</li> </ul>	<ul style="list-style-type: none"> <li>• Consumables &amp; materials: cleaning chemicals &amp; consumables, hygiene consumables, office supplies</li> <li>• Equipment</li> <li>• Vehicles</li> <li>• Clothing: uniforms and Personal Protective Equipment clothing</li> <li>• Electronics (hardware, software)</li> <li>• Security</li> <li>• Service Partners for cleaning, grounds maintenance, maintenance, pest control, industrial sweeping services</li> </ul>
 <p><b>GJK Facility Services NZ Limited</b>                      NZBN 9429046340313                      Registered Office:                      Chester Grey Chartered Accountants Limited, Level 2 Van Den Brink House, 652 Great South Road, Manukau City, Auckland, NZ, 2104                      Business Address:                      As above                      100% ownership</p>	<ul style="list-style-type: none"> <li>• Delivering cleaning, waste and hygiene services to our customers</li> </ul>	<ul style="list-style-type: none"> <li>• Consumables &amp; materials: cleaning chemicals &amp; consumables, hygiene consumables, office supplies</li> <li>• Service Partners for cleaning, waste and hygiene services</li> </ul>
<p><b>GJK Window Cleaning Services</b>                      ACN 614 451 802                      Registered Office:                      255 Port Road, Hindmarsh, SA, 5007                      Business Address:                      135 Cromwell Street, Collingwood,                      VIC, 3066                      75% ownership</p>	<p>GJK Window Cleaning Services is a dormant company and not trading.</p>	
 <p><b>Netronix Pty Ltd</b>                      Trading as GJK Indigenous Solutions                      ACN 619 661 960                      Registered Office:                      255 Port Road, Hindmarsh, SA, 5007                      Business Address:                      3/629 Gardeners Road, Mascot, NSW, 5007                      49% Joint Venture</p>	<ul style="list-style-type: none"> <li>• Delivering cleaning services and indigenous advice; cultural awareness training and development of indigenous people in the community, to their customers</li> <li>• Sales and marketing</li> <li>• Finance and commercial</li> <li>• Technology</li> <li>• People and Culture</li> <li>• Safety</li> </ul>	<ul style="list-style-type: none"> <li>• Consumables &amp; materials: cleaning chemicals &amp; consumables, hygiene consumables, office supplies</li> <li>• Equipment</li> <li>• Vehicles</li> <li>• Clothing: uniforms and Personal Protective Equipment clothing</li> <li>• Electronics (hardware, software)</li> <li>• Security</li> <li>• Service Partners for cleaning</li> </ul>

Although this Statement is for GJK Facility Services, we understand we have an obligation to identify the potential modern slavery risks within the abovementioned entities as well as report on any actions taken in response to those risks.

# OUR APPROACH

To manage operational and business risk, GJK Facility Services has a Risk Management Committee. Part of the committee’s responsibilities is to monitor our service partners, suppliers, and our business practices to ensure there are no forms of slavery-like practices occurring.

This committee was established in 2019 and meet every 12 months to review the company’s Business Risk Matrix. The Committee consists of the Business Management Team; executives representing each function within the business. They review existing business risks across our operations and supply chain and determine if the processes and systems that have been put in place to manage or mitigate these risks are working or if further actions are required. They also review and identify any potentially new risks, the potential impact on the business and actions required to mitigate these risks.

## OUR POLICIES AND PROCEDURES

GJK Facility Services has an International Standardisation Organisation (ISO) Accredited Integrated Management System. The policies and frameworks within this system support the businesses day to day operations, to help ensure we comply with the laws and regulations in which our business operates, including the Modern Slavery Act 2018 (Cth).

Our Modern Slavery Supplier Code of Conduct, Human Rights, and Modern Slavery Policies promotes the ethical behaviours we want within our operations and supply chain. Within our procurement practices, we have several risk mitigation processes in place to help contribute to our commitment to preventing violations of human rights. Additionally, we use a third party to audit our service partners against the *Fair Work Act 2009* (Cth) and *Fair Work Regulations 2009* (Cth) to ensure various health and safety, working hours, and wage requirements within same are abided by.

GJK Facility Services understands that modern slavery is serious exploitation, rather than substandard working conditions or underpayment of workers, but we also know that the two can coexist (and are often related) and believe that monitoring working conditions and pay can assist in identifying and addressing modern slavery risks.



Modern Slavery, Human Rights and Supplier Code of Conduct Policies	Monitor and review potential modern slavery risks to business	Receives regular reporting
Procurement processes in place to identify human right risks, impacts and breaches	Provides governance over modern slavery risks	Provides governance over modern slavery risks
Audits undertaken of service partners and other high risk suppliers to ensure no human right violations occurring	Reviews and submits Modern Slavery Statement to Managing Director	Reviews and approves Modern Slavery Statement with Founder & Managing Director signature
Remediate or remove any suppliers found with critical breaches		

# POTENTIAL RISK TO OUR OPERATIONS AND SUPPLY CHAIN

GJK Facility Services is a facility services company that operates in Australia and New Zealand. GJK Facility Services understands that every entity has modern slavery risks in its operations and supply chains. We have completed our initial scoping exercise to identify the particular modern slavery risks that may be present within our operations and supply chain.

Cleaning is recognised as a high-risk sector and service. This is because it is often associated with lower wages and manual labour. Cleaning has also been linked to breaches of workplace laws, health and safety issues and more serious forms of exploitation such as modern slavery. Additionally, the workforce tends to be base-skilled workers who can be vulnerable, marginalised and from lower socio-economic backgrounds. The ASCI report<sup>1</sup> further identified services procured, such as cleaning, to be high risk. As such, we can immediately identify these things as modern slavery risks within our operations.

GJK Facility Services also outsources a percentage of services to third party contractors. This also increases the potential risk of being linked to modern slavery risks due to reduced visibility and oversight of our service partners' practices.

The operations and supply chain within the entities GJK Facility Services owns or controls is very similar, and we immediately identify these as potential modern slavery risks. We will have a better understanding of the differences and what modern slavery risks exist and actions required to reduce potential modern slavery risks once we undertake the mapping exercise of the entities we control.

Through our third party audits of our service partners, as previously mentioned, we identified some opportunities for improvement and are implementing steps to reduce our risk of potentially being linked and contributing to modern slavery.

In relation to our supply chain, we are currently completing a supplier scoping exercise in order to more clearly ascertain the particular modern slavery risks that may exist within the supply chains.

We have already identified that the business does not have enough information about the risk of some products such as our uniforms, which although sourced through an Australian provider, are made in countries like China, which has been identified as a high geographical risk. Furthermore, the uniforms are made from fabric and the textiles industry has been similarly linked to high risks of child labour, forced labour, and other forms of slavery.

We are continuing to scope the various risks that may be present within our supply chains and expect to continue our journey of understanding in this area.

SECTOR AND INDUSTRY RISKS	MODERN SLAVERY RISKS
Cleaning, Security, Textiles, Property	Non-compliance with labour standards, including health and safety, working hours, wages, forced labour, child labour and freed
PRODUCT AND SERVICES RISKS Services procurement - outsourcing Uniforms - textiles	labour standards, including health and safety, working hours, wages, forced labour, child labour and freedo
GEOGRAPHICAL RISK China	Forced labour / child labour

<sup>1</sup>ACSI Modern Slavery Risks, Rights and Responsibilities: A Guide for Companies and Investors 2019 research report

# ADDRESSING THE RISKS OF MODERN SLAVERY PRACTICES

Above, we have identified some general risks that are linked to our sector and services and therefore may be present within our operations. GJK Facility Services has good oversight of its operations and acknowledges that it does outsource a percentage of its services and that it therefore has less visibility over these areas.

We are also still completing scoping exercises in order to better understand the risks of modern slavery within our supply chains, but once again have identified some general risks that may be present.

One of the steps we have taken over the past 12 months to reduce the potential risk of being linked to modern slavery risks due to reduced visibility and oversight of our service partners' practices was to reduce the outsourcing of labour and increase our direct labour force.

Below we provide the business's action plan in response to the risks already identified. As further risks are identified through the monitoring and assessment frameworks implemented, we intended to add to this plan.

Some actions have been completed, whilst others are still underway.

Actions completed will also be assessed through the monitoring and assessment frameworks to ensure they are fit-for-purpose and embedded within our business practices.

This continual review and improvement process is key to ensuring any risks to the business are addressed properly.

POTENTIAL MODERN SLAVERY RISK	ACTION
<p><b>Non-compliance with labour standards in the supply chain, including health and safety, working hours, wages, forced labour, child labour and freedom of association</b></p>	<p><b>Mapping our supply chain to understand modern slavery risks</b></p> <p>Undertake scoping exercise of supply chain to identify modern slavery risks to business using framework provided in the Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities:</p> <ul style="list-style-type: none"> <li>• Service partners - underway</li> <li>• Suppliers - underway</li> </ul> <p><b>Robust assessment of suppliers/ service partners we work with</b></p> <ul style="list-style-type: none"> <li>• Modern Slavery/Human Right questions to be incorporated into Pre-Qualification Assessment Questionnaire - underway</li> <li>• Regular internal/external audits of Service Partners and Suppliers to mitigate the risks of unethical practices in our supply chain - underway</li> </ul> <p><b>Reduce use of labour outsourcing model to gain greater oversight/control</b></p> <ul style="list-style-type: none"> <li>• Increasing direct labour force model into business - ongoing</li> </ul> <p><b>Implement modern slavery/human right elements into our processes and practices</b></p> <ul style="list-style-type: none"> <li>• <b>Develop and implement Modern Slavery Policy - completed</b></li> <li>• Review and update Procurement processes to reduce risk of identified modern slavery risks to the business - underway</li> <li>• <b>Incorporate identified modern slavery risks into Business Risk Matrix - completed</b></li> <li>• Develop and implement Service Partner and Supplier Code of Conduct - underway</li> <li>• Review and update existing Service Partner Induction process to capture the businesses stance and expectations around modern slavery and human rights</li> </ul>

# ADDRESSING THE RISKS OF MODERN SLAVERY PRACTICES

POTENTIAL MODERN SLAVERY RISK	ACTION
<p>Non-compliance with labour standards in the supply chain, including health and safety, working hours, wages, forced labour, child labour and freedom of association</p>	<p><b>Collaborate, educate and raise awareness of modern slavery</b></p> <ul style="list-style-type: none"> <li>• Provide modern slavery training to our people to raise awareness and understanding</li> <li>• Provide training on updated Procurement processes highlighting</li> <li>• Collaborate with our Service Partners and Suppliers to:                             <ul style="list-style-type: none"> <li>• help raise awareness of modern slavery/human rights</li> <li>• help them address any identified risks</li> </ul> </li> </ul>
<p>Non-compliance with labour standards within non reporting entities that GJK Facility Service owns or controls, including health and safety, working hours, wages, forced labour, child labour and freedom of association</p>	<p><b>Collaborate with associated entities of GJK Facility Services to identify and better understand potential modern slavery risks</b></p> <ul style="list-style-type: none"> <li>• Undertake mapping exercise of operations and supply chain with entities GJK Facility Services controls</li> <li>• Implement necessary steps to address any identified modern slavery risks</li> <li>• Provide guidance and support to entity that GJK Facility Services has ownership in to help them reduce potential modern slavery risks to their operations and supply chain</li> </ul>

This Statement was approved by the Sole Director of G.J. & K Cleaning Services Pty Limited on 9 December 2020.



**George Stamas**  
Founder and Managing Director