



Quad Services

**MODERN SLAVERY
STATEMENT 2020**

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 is our first Modern Slavery Statement (MSS), prepared in accordance with the Australian Modern Slavery Act 2018 (Cth) (MSA). The Quad MSS covers our actions to identify and address modern slavery risks for the year ending 30 June 2020 (FY2019-20).

ABOUT QUAD

Formed in Australia in 1972, Quad initially provided cleaning services in the North Shore area of Sydney. By the 1980's 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, 50 experienced management staff, 700+ contracts, and offices in all Australian states and territories and in New Zealand.

Quad is certified to Quality Management System ISO9001, Environmental Management System ISO14001 and Occupational Health and Management System AS/NZS 4801.

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

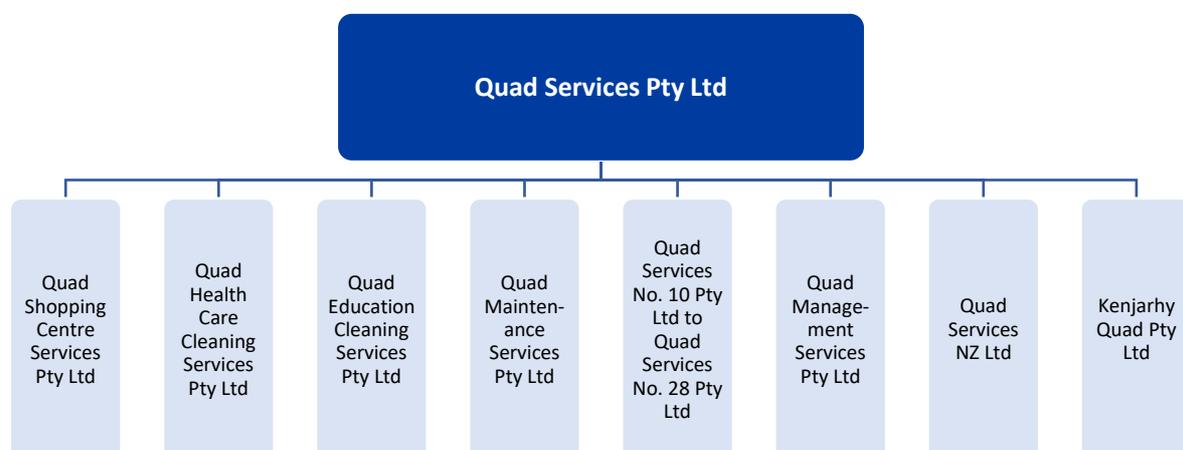
THE QUAD COMPANY STRUCTURE

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 also operates services in New Zealand and operates a joint venture indigenous entity, Kenjarhy Quad Pty Ltd.

Across the organisation, 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
- Australian Security Industry Association Ltd
- Facilities Management Association
- Green Building Council of Australia
- Clubs NSW
- Supply Nation

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. Quad's approach and actions recognise and address these risks within the Quad 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 not only to our own activities but also to those within our supply chain.

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

Our approach to addressing modern slavery risks in FY2019-20 has focused on:

- conducting awareness training for Management and staff,
- undertaking a risk assessment,
- reviewing all Quad's policies, and
- engaging with suppliers.

KEY AREAS OF ACTION IN FY2019-20

Like many other businesses in 2020, Quad Services continues to be impacted by the effects of COVID-19.

We took the following critical actions in FY2019-20:

- Raising 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.
- Increasing our understanding of modern slavery risks across our operations and Level One suppliers

- Mapping our supply chains
- Embedding considerations of modern slavery risks in our processes
- Engaging with high-risk suppliers
- Updated our standard processes and policies and updated our onboarding due-diligence arrangements to include modern slavery considerations
- Participated in the Australian Property Council's Modern Slavery Assessment
- Responded to and participated in client-initiated modern slavery reviews/assessment projects
- Engaged with subject matter experts such as Anti-Slavery Australia and Informed 365
- Reinforced our whistleblowing arrangements which allow employees and third parties to report any concerns regarding unethical or illegal conduct, including modern slavery. Employees can report problems to their manager, or if they wish to remain anonymous, employees and third parties can notify us via our whistleblowing processes

OUR SUPPLY CHAIN

Quad suppliers have been split into two groups:

- Level One >\$500,000 annual expenditure
- Level Two <\$500,000 annual expenditure

Suppliers – Services

All service suppliers are located in Australia.

Category	Description
Bio-hazard waste services	Feminine hygiene, biohazard waste, sharps disposal
Equipment hire	Plant and equipment hire companies for short term equipment needs
General cleaning services	Cleaning services contractors
Maintenance and repairs	Breakdown, preventative maintenance and repairs of Quad owned equipment
Professional services	Legal, insurance, finance, marketing, HR + WHS, software support, consultants, and travel
Specialist cleaning services	Technical cleaning services, carpet cleaning, confined space and working at heights
Uniforms/linen	Uniform and laundry services
Waste collection	General waste and recycling services

Suppliers – Products

Suppliers of products are located in Australia, but some products are sourced from overseas.

Category	Description
General cleaning supplies	Cleaning chemicals, rubbish bags, cloths, mops, brooms, buckets, trolleys,
Washroom supplies	Toilet paper, hand towel paper, soap, sanitiser
Uniforms and PPE	Shirts, trousers, hats, vests, cold and hot weather gear
Equipment and plant	Vacuum cleaners, scrubbers, foggers
Vehicles	Cars, vans, motorised sweepers

ITC supplies	Computers, phones, tablets, radios, photocopiers, printers
Office supplies	General office stationery, furniture, food and beverage

POTENTIAL RISKS OF MODERN SLAVERY

The risks of Modern Slavery mean that Quad can cause, contribute to, or be directly linked to modern slavery through our operations and supply chain.

In FY2019-20, Quad assessed our operations and supply chain. We have determined our potential risk as follows:

- Cause modern slavery – low potential
- Contribute to modern slavery – low to high potential
- Directly linked to modern slavery – low to high potential

The assessment identified the inherent risk of modern slavery across our operations and supply chain using a combination of industry-related risk factors, including sector, product, services-related risks, and geographic risk factors.

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

ADDRESSING MODERN SLAVERY RISKS

Quad requires our suppliers and contractors to abide by the requirements of the Modern Slavery Act 2018, per appropriate service agreements.

As part of their contractual obligations, Suppliers and Contractors provide information (as required) so that Quad can gauge the supplier's and contractor's ongoing commitment to eradicating modern slavery within their own business and those of their own suppliers and contractors.

In 2020 Quad engaged with our Level One suppliers, and as part of our due diligence, issued a Quad Modern Slavery Questionnaire for them to complete. The feedback from those questionnaires helped us identify where modern slavery risks may exist within our supply chain.

Our Operations

Our risk assessment identified our operations as a low risk, given its nature and our location in Australia.

However, Australia's cleaning services sector is potentially at high risk of modern slavery, as is the cleaning industry globally. Before the introduction of the Modern Slavery Act, Quad already had a strong focus on compliance with Australian employment laws and social and ethical decision-making in our employment practices and when choosing suppliers and products.

Quad recognises that it is vital that our current practices are strengthened and continually improved to ensure that the potential risk of modern slavery in the cleaning industry is reduced as much as is practically possible.

Our Supply Chain

Our risk assessment identified our supply chain ranging from low to high risk. While we have engaged with our Level 1 suppliers, we have not yet undertaken a comprehensive review of our Level 2 suppliers. As a result, our risk level varies from low to high.

Further, Quad does not have visibility over sections of our supply chain. Product suppliers are based here in Australia, but some of those products are sourced from overseas. Quad does not yet have complete information on where and how those products are made.

Our risk assessment used external data and guidance, drew from the Modern Slavery Act guidance for reporting entities and Modern Slavery guidance notes from our membership bodies.

Because of the impact of COVID-19, we concentrated our attention on our Level One suppliers. We will continue to assess our supply chain and focus on our Level 2 suppliers in the coming year.

MEASURING EFFECTIVENESS

Our progress against our goals for the FY2019-20 is set out below:

Goals	Action/Status
Educate the senior leadership team on the requirements of the Modern Slavery Act.	<ul style="list-style-type: none"> Initial formal training provided to the senior leadership team Modern slavery included in an induction program for all employees
Assign responsibility and resources for the implementation of modern slavery strategy. The People and Culture Manager will be the project leader.	<ul style="list-style-type: none"> Responsibility assigned Goals for FY2020-21 established
Identify key internal and external stakeholders	<ul style="list-style-type: none"> Level 1 and Level 2 suppliers identified Key external stakeholders identified Provisions in place to annually review Level 1 and Level 2 suppliers
Set up an internal working group on human rights and modern slavery. Working group to include senior management, finance, procurement, tender and compliance teams.	<ul style="list-style-type: none"> Working group established Regular meetings undertaken
Map Quad's supply chains. Identify general sectors and industries, types of products and services, countries, and entities involved in Quad's operations. Identify the most severe risks.	<ul style="list-style-type: none"> Commenced mapping our supply chains Communication plan for Modern Slavery established requirements Prepared questionnaires for suppliers
Review existing policies and processes for identifying and addressing human rights and modern slavery risks. Conduct a gap analysis	<ul style="list-style-type: none"> Policies and procedures reviewed Modern slavery policy introduced Modern slavery provisions included in contractor and supplier compliance
Act on the findings of the gap analysis and update policies, procedures and contracts accordingly	<ul style="list-style-type: none"> A survey of Level 1 suppliers and contractors was undertaken. Survey of Level 2 suppliers and contractors to be undertaken in FY2020-21 Modern slavery requirements added to Quad procurement policies

Identify Quad's human rights and modern slavery risks in our direct operations teams and supply chains	<ul style="list-style-type: none"> • Level 1 supplier survey completed • Risk assessment for Level 1 complete • We engaged a third party to conduct a wage audit
Train our employees in Human Rights	<ul style="list-style-type: none"> • Commenced training our senior leaders in Modern Slavery concepts and requirements • Modern Slavery forms part of our employee's induction
Track our human rights and modern slavery progress and performance	<ul style="list-style-type: none"> • A baseline for Level 1 performance now established • A baseline for Level 2 underway
Document information from previous steps in modern slavery reporting statements	<ul style="list-style-type: none"> • Submission of FY2019-20 Modern Slavery statement • Completion of Modern Slavery questionnaires from suppliers when required

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

For FY2019-20 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 FY2020-21:

- Provide further training to staff and identified key stakeholders;
- Continue to refine our risk assessment as appropriate, particularly as new data and new tools become available;
- Continue to engage with suppliers and service providers identified from their questionnaire responses or exposure to high-risk industries, countries, or sectors;
- Undertake a review of policies and processes and update where necessary; and
- Develop a modern slavery contract clause and update contracts where appropriate.

APPROVAL

This Modern Slavery Statement is signed on behalf of the Board and is approved for publication by:



Andrew Yardley

Chief Executive Officer

23 February 2021