



Springmount Services

Modern Slavery Statement

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Overview

This document is Springmount Services Company’s first annual Modern Slavery Statement, covering the period 1 July 2022 and 30 June 2023.

Context

In 2019, the Commonwealth Modern Slavery Act 2018 (Cth) (Commonwealth Act) came into force, introducing a statutory modern slavery reporting requirement for larger companies operating in Australia. Under the Commonwealth Act, entities are required to lodge a modern slavery statement if they are an Australian entity or carry on business in Australia, with a minimum annual consolidated revenue of \$100 million. Other entities may volunteer to comply with the Act by notifying the Minister for Home Affairs.

Statements must be approved by the Board (or relevant governing body) of the reporting entity and signed by a director. Directors must also ensure that their entity’s statement is lodged on the Government’s online register.

The Commonwealth Act requires reporting entities to lodge statements that include a description of:

- the risks of modern slavery practices in the reporting entity’s operations and supply chains (including those relevant to its owned and controlled entities);
- the actions taken by the reporting entity during the reporting period to assess and address those risks; and
- how the reporting entity measures the effectiveness of actions to assess and address modern slavery

What is Modern Slavery?

Modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

The Australian Government estimates that there are approximately 1500 victims of modern slavery in Australia at any time. The United Nations estimates that at least 40 million people around the globe are in modern-day slavery. Those most at risk include women and children who may have little or no capacity to protect themselves.

Australia has agreed with the United Nations to attempt to abolish modern slavery by 2030.

Serious Exploitation

There are eight types of serious exploitation which combined make up modern slavery:

- 1. Trafficking in persons** – the recruitment, harbouring and movement of a person for exploitation through modern slavery.
- 2. Slavery** - situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
- 3. Servitude** – situations where the victim personal freedom is significantly restricted and they are not free to stop working or leave their workplace.
- 4. Forced marriage** – situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the marriage ceremony's nature and effect.
- 5. Forced labour** - situations where victims are either not free to stop work or not free to leave their workplace.
- 6. Debt bondage** – situations where the victims services are pledged as a security for a debt and the debt is manifestly excessive of the victims' services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
- 7. Deceptive recruiting for labour or services** - situations where the victim is deceived about whether they will be exploited through a type of modern services.
- 8. Serious exploitation of children and child labour** – situations including enslavement, sexual exploitation, used to produce or traffic drugs or exposure to dangerous work. (the "worst forms").

Freedom from slavery is a fundamental human right. Under the Australian Government endorsed United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles), entities have a responsibility to respect human rights in their operations and supply chains. This responsibility includes taking action to prevent, mitigate and, where appropriate, remedy modern slavery in your entity's operations and supply chains.

Other illegal and harmful practices may be present within the supply chain but are not considered modern slavery. Practices like substandard working conditions or underpayment of workers may indicate more severe exploitation, corruption, and practices that impact human rights.

Modern Slavery Act 2018

The Australian Government’s Modern Slavery Act 2018 (the Act) came into force on 1 January 2019. The Act establishes a mandatory reporting regime for entities:

- with consolidated revenue of at least a \$100 million in the reporting period, and
- who is either an Australian entity or a foreign entity carrying on business in Australia.

The Act requires reporting of an Annual Modern Slavery Statement. The Statement must identify and address the risks of modern slavery in Springmount Services Company’s operations and supply chains and actions taken to address those risks.

Mandatory Requirements

There are seven mandatory criteria required to be addressed in the Statement:

1. Identify the reporting entity.
2. Describe the reporting entity’s structure, operations and supply chains.
3. Describe the risks of modern slavery practices in the reporting entity’s operations and supply chains and any entities it owns or controls.
4. 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.
5. Describe how the reporting entity assesses the effectiveness of these actions.
6. Describe the consultation process with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the Statement).
7. Any other relevant information.

Reporting Period (2022-2023) and Timelines

The first Australian Government Modern Slavery Statement covers the 2019-20 Australian financial year (reporting period). This statement covers the period 1 July 2022 to 30 June 2023.

Statements are to be provided to the Modern Slavery Business Engagement unit; Australian Border Force, Department of Home Affairs. Entities who fail to comply with the reporting requirements will be publicly named and may be subject to remedial action to ensure future compliance.

The Modern Slavery Business Engagement Unit expects entities to use a continuous improvement approach to implement the requirements and see demonstrable improvements in the quality of information and the understanding of modern slavery over time.

Our Statement

Reporting Period 1 July 2022 – 30 June 2023

Springmount Services opposes slavery in all its forms and seeks to minimise the risk of modern slavery occurring in our business and supply chains. At Springmount Services we acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices. We also recognise that human rights is an area of growing importance to our employees, customers, stakeholders and the communities where we operate. Springmount Services strong management capability ensures that we continue to promote best practice through all levels of our operation. Our integrated management systems provide a strong governance framework to monitor and implement our business practices.



General Structure

Executive Structure

The Executive Committee consists of;

- Managing Director,
- Chief Executive Officer
- Chief Financial Officer,
- Chief Corporate Officer
- Regional General Managers

Operational and Service Areas

- Commercial Cleaning,
- Security
- Maintenance
- Concierge

Australian Business Number

61 101 763 179

Owned/Controlled Entities

Springmount Services Pty Ltd – 61 101 763 179

Springmount Property Services Pty Ltd – 68 133 096 830

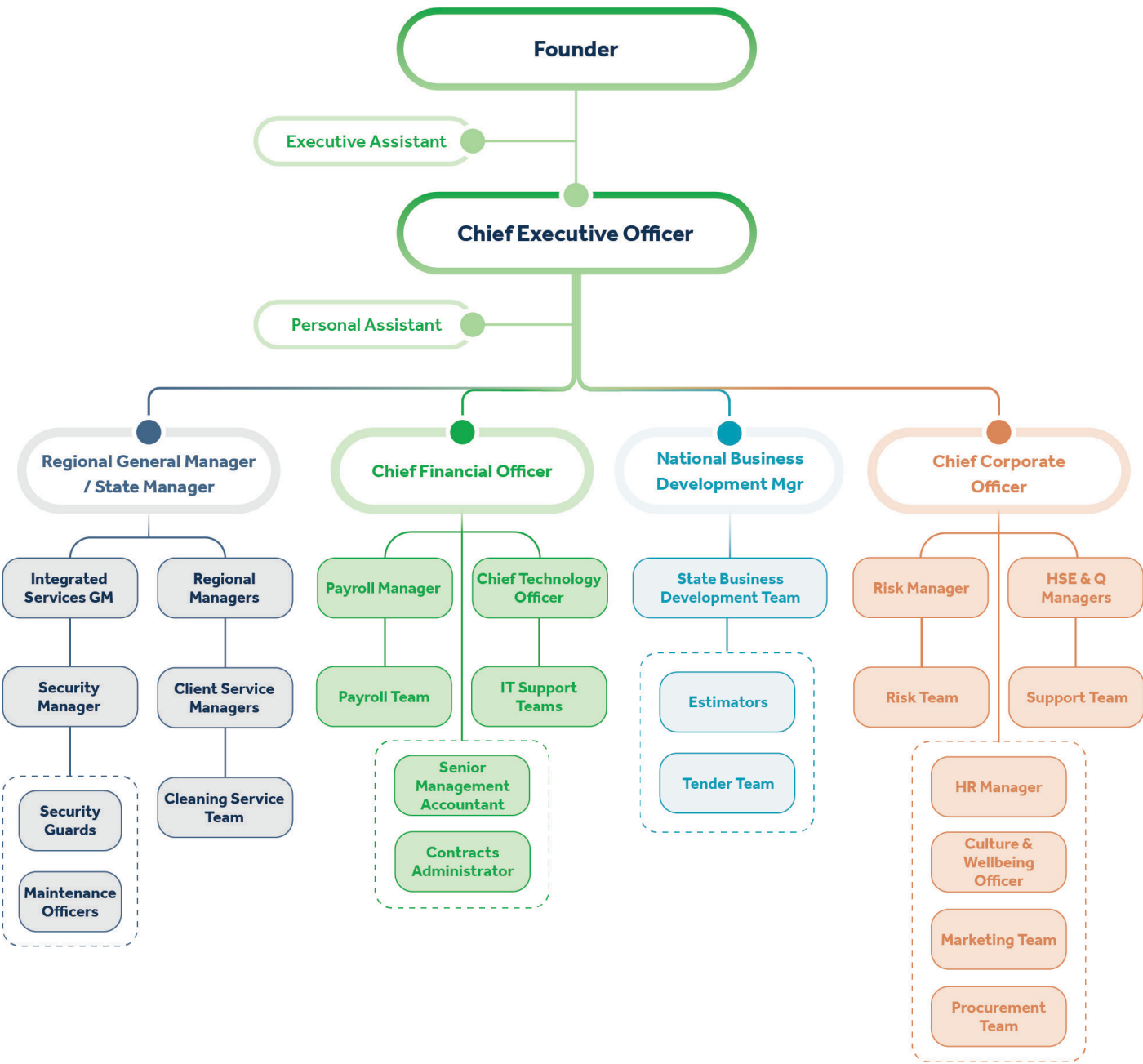
Property Management Holdings Pty Ltd – 71 637 255 451

Springmount Cleaning Services Pty Ltd – 65 143 907 519

Registered office and locations

22 Vanessa Boulevard, Springwood QLD 4127

Organisational Structure



Primary Role

Partnering with clients providing outsourced support and services through long-term relationships by gaining a thorough understanding of their business requirements and cultural fit.

Contract and Specialist Cleaning

- General Cleaning
- Sanitisation and High-Touch-point cleaning
- Deep Hygiene Cleaning
- Carpark Cleaning
- Machine Floor Scrubbing
- High-Pressure Cleaning
- Window and Glass Cleaning
- Cleaning and Facilities Management Consulting
- Carpet and Upholstery Cleaning
- Amenities Supply
- Mould Treatment and Removal

Physical and Electronic Security

- Static and Physical Guards
- Event Security
- Concierge Services
- Mobile Security Patrols
- Alarm Monitoring and Control Room Response
- Gatehouse and Weighbridge Operations
- Customised Solutions

Maintenance Services

Preventative and reactive maintenance solutions throughout Australia. Delivered as part of an integrated package or individually, to suit client needs. Also includes the Maintenance Workflow system, to schedule, track and report any maintenance services carried out on clients' sites.

- Grounds Maintenance and Landscape Services
- Mowing and Trimming
- Tree Trimming
- Weed Control
- Ground Maintenance
- Green Litter Rubbish Removal

Concierge Services

We provide customer service personnel for:

- Shopping Centres
- Retail and Commercial Offices
- Information and Customer Services Desks
- Valet and Carparks
- Security

Employees and Representatives

Approximately 1800 staff are employed in full-time, part-time, and casual roles across Queensland, New South Wales, Victoria, South Australia, and Tasmania. All employees have Australian work rights with visas vetted by the Department of Immigration.

There are no representatives.

Countries of Operation

There are no overseas operations.

Investments

There are no significant investments.

Stakeholders

Springmount Services Company stakeholders include, but are not limited to:

- our client community,
- Federal, State and Territory governments and their agencies,
- our providers and partners,
- our shareholders,
- our employees and partners,
- our associates, and
- the Australian community

Primary Role

As a provider of integrated facility services, Springmount Services considers the risk of modern slavery within its direct internal operations to be low. However, we acknowledge that some of our supply chains are multi-tiered and it may mean it is directly or indirectly exposed to the risk of modern slavery. Springmount Services’ supply chain is diverse and multifaceted. It consists of suppliers serving diverse sites across Australia for cleaning materials and equipment, chemicals, machinery, training, uniforms, IT solutions, among others. These cover the expertise required to provide support to our clients and customers.

All suppliers to Springmount Services Company are required to comply with any laws, statutes, regulations, bylaws, ordinances or subordinate legislation in force from time to time, including in particular but not limited to the:

- Crimes Act 1914
 - Criminal Code Act 1995
 - Disability Discrimination Act 1992
 - Freedom of Information Act 1982
 - Environment Protection and Biodiversity Conservation Act 1999
 - Privacy Act 1988
 - Racial Discrimination Act 1975
- Safety, Rehabilitation and Compensation Act 1988
 - Sex Discrimination Act 1984
 - Trade Practices Act 1974
 - Workplace Gender Equality Act 2012
 - Work Health and Safety Act 2011
 - Modern Slavery Act 2018
 - Corporations Act 2001 (Cth)

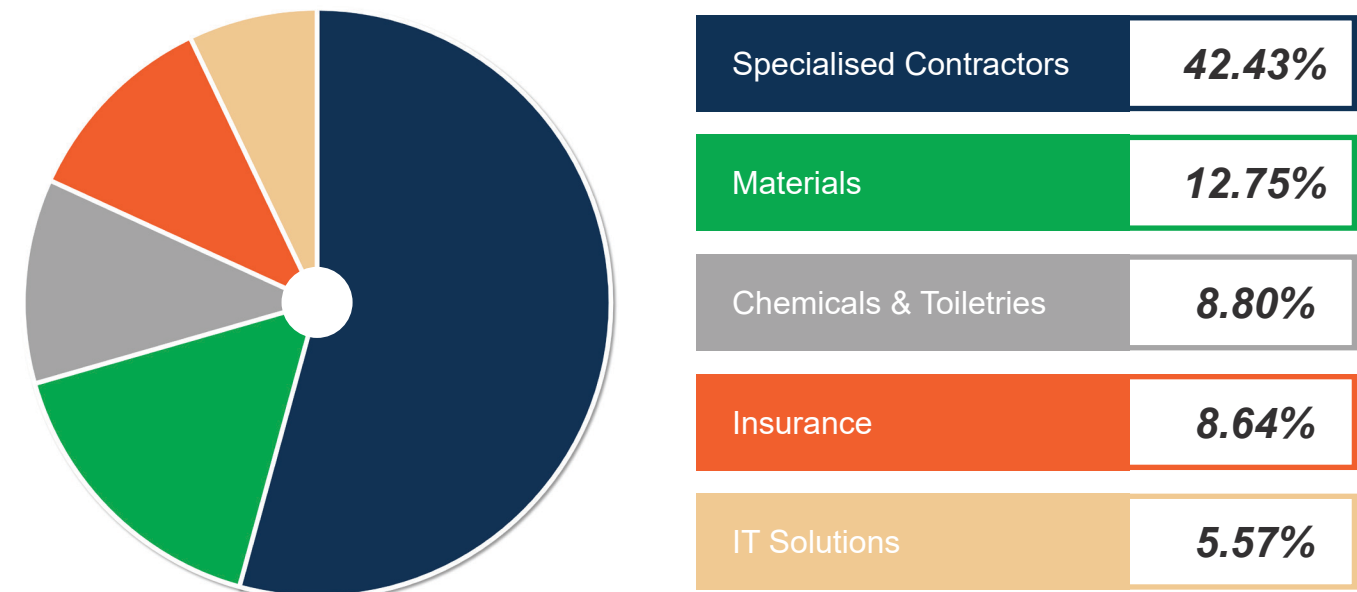
Statutes

All safety, legal and other legislative requirements applicable to the client’s workplace are identified by consulting with the client. Pertinent information is retained in the client file for future reference. A list of relevant legislation, regulations, codes of practice and standards pertinent to the Company are maintained on a Register.

All Standards, Codes of Practice and legislation/regulations that apply to the Company’s operations are registered with Quality House Watch to ensure the Company is advised whenever they are changed.

Major Suppliers

Springmount Services Tier 1 procurement supplier categories are listed below. These suppliers actively contribute to the Company’s commitment to ethical practices and are crucial in generating superior long-term performance.



Springmount Services Company's operations and supply chains across many industries and sectors are limited to Australian-based operations. All new suppliers undergo a comprehensive due diligence assessment that covers key areas, including Modern Slavery, Human Rights, Environment, Governance, Fair Operating Practices and Health and Safety. Our Tier 1 suppliers are annually mapped and audited to ensure they meet our sustainability standards.

Risk Assessment

All risk assessments and analyses are consolidated into an automated reporting system. Regular and periodic management reviews are conducted and acted upon at the highest levels of management in the Company.

Risks and opportunities are well addressed at the Executive level through their responsibilities at the Head Office and each Branch at an operational level. They are often managed informally and monitored through monthly meetings; others are more formally organised through automated tracking and reporting systems, including Donesafe, Daelibs and JLB Track.

The risk assessment methodology is described in the Management Manual and is based on a Likelihood (4 criteria) x Consequence (4 measures) matrix resulting in 7 score levels. The same matrix applies to all risk assessments and is programmed into the tracking and reporting systems.

Therefore, it is unlikely that the currently known supply chain has risks that meet the threshold for serious exploitation as defined by the Modern Slavery Act 2018.

Key indicators considered in assessing supplier risk are;

- Sector and industry risk
- product and service risk
- geographic risk, and
- entity risk.

Control and mitigation measures are anchored on;

- degree caused by the Company itself
- risk contributor to fight the Company, and
- risks linked to the Company.

Nonetheless, Springmount Services Company understands that;

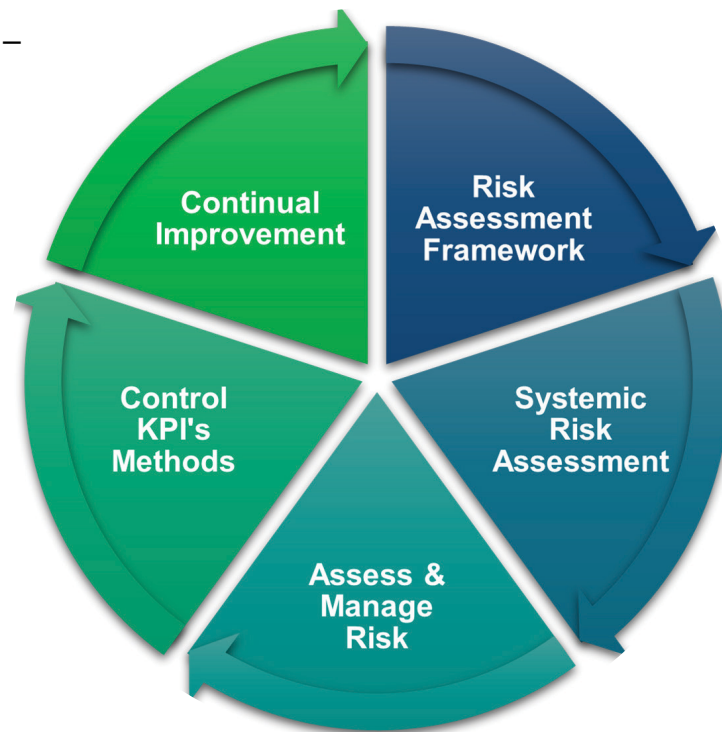
- There is a possibility that presently assessed contracts and supply chains may develop links to modern slavery further down the supply chain where they are outside of the Company's visibility and control.
- The Company also understands that our visibility of practices in our complete downstream supply chain may be limited in sourcing some goods. We also acknowledge that modern slavery risks may alter over time, requiring us to be attuned to broader developments.

However, as detailed above, we believe we have a very comprehensive and systemic approach towards doing everything possible to eliminate modern slavery risks and practices.

Controls

Springmount Services conducts the following to identify and control the risk;

- Scope and determine the Company's structure, businesses and supply chains utilising the existing risk assessment methodology.
- Formulate policies and procedures concerning modern slavery; including but not limited to;
 - ➔ collating current policies,
 - ➔ identifying gaps,
 - ➔ adapting existing policies and
 - ➔ formulating new policies as required.
- Systemic risk assessment – highlighting business operations and supply chains where there is a risk of modern slavery taking place;
- Assessing and managing identified risks – i.e., carrying out further due diligence in Company operations and supply chains and reviewing and adapting contract terms and codes of conduct with suppliers;
- Establishing processes and KPIs to monitor the effectiveness of the steps taken to ensure that modern slavery is not taking place in the business or supply chains;
- Implementing remedial steps where modern slavery is identified;



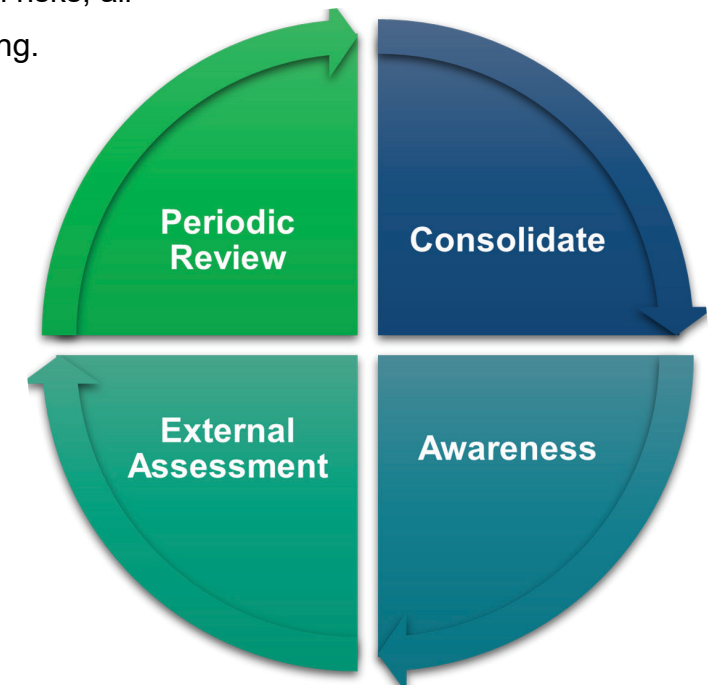
Evaluation

The incorporation of specific processes and checklists to assess and address the risks of modern slavery is a relatively new undertaking for the Company. To evaluate these processes' effectiveness, we will undertake a phased strategy to the entire procurement life cycle.

Consolidate: Springmount Services will address the risks of modern slavery practices in its operations and supply chains through strict procurement and operational procedures, in line with legislation, procurement guidelines, and policy.

Awareness: To assist with identifying additional risks, all appropriate staff will complete awareness training. This training, produced by the Australian Government Addressing Modern Slavery in Government Supply Chains toolkit), will assist in addressing modern slavery Risks by educating staff on:

- what modern slavery is,
- what modern slavery looks like in supply chains,
- what we can do to address modern slavery risks further, and
- how to report concerns about modern slavery practices.



External Assessment: The Company has gained external audit/certification in;

- Human Resources Compliance Code (TQCSI)
- ISO 20400 Compliance certification
- Cleaning Accounting Framework (CAF) – Prequalification Contractor Member

Conduct Periodic reviews to update the Executive team: The organisation will ensure that a continuous improvement lens is retained throughout the entire process. This will build on the organisation's already extensive suite of external certifications.

Consultation

The Company operates under a consolidated quality assurance and quality improvement framework. Therefore, extensive consultation and integration of this Statement was conducted through an effective and transparent system. This ensures that there is no deviation across the Company in any of its subordinate entities.

Extensive ISO certifications are in place, ensuring that an integrated management system is in place. An Executive and team dedicated to the maintenance of the system, which presently includes;

- ISO 9001- Quality Assurance
- ISO 14001 – Environmental
- ISO 45001- Workplace Health & Safety
- ISO 10002 – Quality Assurance – Customer Satisfaction
- ISO 20400 -Sustainable Procurement
- TQCSI Human Resources Compliance Code

Business Improvement Plans (BIPs) are developed and maintained for National and each Branch. They are based on a fiscal year and include objectives and KPIs.

Approval Signature of Responsible Member of the Reporting Entity

On 22nd November 2023, this Modern Slavery Statement for FY2022-2023 was approved by Martin Stack as the Sole Director, acting as the principal governing body of Springmount Services Pty Ltd, ABN 61 101 763 179, as defined by the Modern Slavery Act.



Martin Stack

Date: 22/11/2023

Our Commitments

Springmount Services is committed to making positive economic, social and environmental contributions to society, consistent with the principles of honesty, integrity, fairness and respect. We prohibit discrimination and forced, trafficked and child labour and are committed to safe and healthy working conditions, including the right to freedom of association and collective bargaining.

