

Consolidated
est.1977

Modern Slavery Statement

2020

Consolidated Property Services (Australia) Pty Ltd ('Consolidated') is subject to the *Modern Slavery Act 2018 (Cth)* ('the Act') that commenced operation on 1 January 2019. The Act requires reporting entities subject to the Act, to produce an annual modern slavery statement. Our first annual statement is due on 31 March 2021.

Consolidated takes a zero-tolerance approach to any form of modern slavery including servitude, human trafficking and forced labour. We are committed to an ethical and transparent approach to business, ensuring effective systems and controls are in place to safeguard against any form of modern slavery within our business operations or our supply chain.

This statement sets out the steps Consolidated takes to address the risks of modern slavery and human trafficking in our operations and supply chains, in accordance with the *Act*.

OUR BUSINESS

Consolidated is an Australian owned and operated company specialising in Commercial Cleaning. Consolidated operates only in the Australian market, with operations currently in Melbourne, Sydney, Adelaide, Brisbane, and Regional Victoria.

We were established in 1977 by the Grant family. Consolidated is a privately owned company which employs a large, diverse and dedicated team who provide a range of services to commercial, retail, and educational. 100% of our workforce are directly engaged, and we do not participate in sub-contracting practices of our core cleaning services.

As a leader in the property services industry, we understand our responsibility to do the right thing, and ensure business, as well as our supply chain are both ethical and sustainable.

Our supply chain consists of local suppliers who source their materials and products from many countries worldwide with the majority of suppliers located in China. We maintain a great working relationship with each of our suppliers, and we continually work closely with them to ensure the environments in which our products are sourced are safe, fair, sustainable and responsible. In addition to our supplier agreements, we will utilise the 'Ethical Sourcing Questionnaire' and customised surveys via our online supplier platform for further due diligence on our supply chain to identify any modern slavery risks.

BUSINESS INTEGRITY

Consolidated believes that by incorporating the Ten Principles of the UN Global Compact into strategies, policies and procedures, and establishing a culture of integrity, Consolidated are not only upholding the basic responsibilities to people and planet, but also setting the stage for long-term success.

The Ten Principles of the United Nations Global Compact that Consolidated are committed to through our Business Integrity Policy includes:

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

As a means of compliance, all suppliers of goods to Consolidated are subject to the terms and conditions of our supplier agreements, which incorporates Modern Slavery and Ethical sourcing compliance into the agreement.

Our attention is on identifying and remediating modern slavery risks related to our operations and the supply chains supplying products for our clients. We acknowledge that other business relationships may contribute or be linked to modern slavery risks and we aim to eliminate those risks and have more oversight in the future.

COMPLIANCE

We have numerous internal policies to ensure we are conducting business in an ethical and transparent manner, these include:

Supplier Agreements:

These are signed annually by our suppliers and outline the expectations for suppliers who work with us. All suppliers including any subcontractors engaged by our suppliers must agree to and abide by our code of conduct and the terms and conditions contained within the Specialist Independent Contractor Agreement (for sub-contractors) and Supplier Agreement (for suppliers).

Traceability:

As we work towards full traceability of our supply chain, it is a requirement that all suppliers disclose the details of their subcontractors as required by Consolidated.

Modern Slavery Policy:

This policy sets out our stance on modern slavery, human trafficking, child labour and forced labour and explains the response and actions in the event that instances are identified.

Whistleblower Policy:

Our whistleblower policy lets all of our team members know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

MONITORING AND REMEDIATION

Before engaging with a new supplier, Consolidated conducts due diligence checks on the supplier. In doing so, Consolidated maintains an approved supplier list and only these suppliers may be used by the business.

We have implemented the use of the Cm3 Online Contractor portal to manage our approved suppliers. We will utilise the 'Ethical Sourcing Questionnaire', customised surveys for further due diligence and full Modern Slavery review contained within this platform to increase transparency of any potential Modern Slavery risks within our supply chain.

Additionally - all suppliers must sign a Specialist Independent Contractor (SIC) Agreement which requires all new and existing suppliers to confirm that:

- All Suppliers working with Consolidated will be subject to the reporting requirements of the *Modern Slavery Act 2018 (Cth)* as part of the supply chain for Consolidated Property Services.
- all of its employees in will be paid in accordance with all relevant industrial instruments, including Industrial Agreements and Awards, applicable to the scope of works performed by the Specialist Independent Contractor.

We may terminate the Service Agreement at any time should any instances of modern slavery or any other zero tolerance breach of any human rights issues come to light.

We conduct internal training of our teams to include understanding the signs of modern slavery and what to do if they suspect any form of modern slavery is taking place within our business and/or our supply chain.

VERIFICATION

We monitor to ensure that slavery and/or human trafficking is not taking place within our business or supply chain, through:

- Review of any reports received from employees, the public, and/or regulatory agencies to indicate that modern slavery practices have been identified.
- Remediation and management reporting of breaches identified by our audit program or whistleblower program
- Annual review of our risk assessment process and audit programs to ensure they are relevant and up to date
- Consolidated Risk committee oversees the ethical sourcing strategy and framework in strict accordance with the businesses values and ethical framework
- Regular training and capacity building for team members, third party auditors and suppliers

- Engagement with stakeholders to maintain a proactive dialogue on our performance

Further Steps

As an organisation, we are committed to building on what we do each year to prevent modern slavery and human trafficking. Following a review of the effectiveness of the actions we have implemented, in 2021 we intend to:

1. Roll out formal training to all Managers and other key staff;
2. Enhance our processes around worker record analysis to identify risk areas such as multiple workers having the same contact telephone numbers, address or bank details;
3. Carry out a retrospective audit of any of our suppliers who are operating in high risk areas;
4. Continue to explore how we may work more closely with our clients to ensure respect for human rights along the full value chain.
5. Continue to work to trace our full end-to-end supply chain from raw materials to our end products to ensure we have a thorough understanding of our supply chain.

Approval for this statement

This statement was approved by the Board of Directors on 24 February 2021.



Arthur Mallios –
Chief Executive Officer
26 February 2021

- **End of Document** -