



# Modern Slavery Statement

© JANI-KING AUSTRALIA PTY LTD

ISSUED: OCTOBER 2021

# Executive Summary

Jani-King Australia was founded in 1993 and is part of the world’s largest commercial cleaning franchise business, who pride itself on delivering superior cleaning services to a multi-national market.

A leader in our industry, the Jani-King name is associated with a reputation for reliability, quality, customer care and success. Jani-King’s growth over the years has resulted from the reliable delivery of its professional services through a management program that’s been hailed by its clients as the best in the industry. An unwavering commitment to customer satisfaction has always been the foundation of Jani-King’s success

Our portfolio of clients is wide-ranging and we are the preferred supplier to leaders in the Offices, Education, Retail, Healthcare, Industrial, Childcare and Hospitality industries.

With master franchises located in New South Wales, Queensland, ACT, Victoria, Tasmania, South Australia, NT and Western Australia, we are a national service provider with the capacity to service clients wherever required.

In 2020, Jani-King expanded the provision of speciality services to our clients to include a full range of facilities management services under the brand Jani-King Facilities Management (JKFM). Jani-King attributes its success to the idea that owner-operators deliver the very best service because they have a personal stake in the business. Our Franchisees and Contractors operate under a global brand that is synonymous with quality, professionalism and success. By providing our Franchisees and Contractors with the resources, mentoring and support to succeed, they have everything it takes to build a successful cleaning business.

Jani-King prides itself on providing relevant training to all franchisees, their workers, contractors and internal employees on company safety procedures and policies through a bespoke online training system.

## JKFM Services



CLEANING SERVICES



PLUMBING SERVICES



GROUNDS MAINTENANCE



MANAGED HYGIENE SERVICE



PEST CONTROL SERVICES



HYDRAULICS PLANT & EQUIPMENT



FIRE SERVICES PROVIDER



HVAC SERVICES



WASTE MANAGEMENT



GENERAL BUILDING MAINTENANCE



ROOF & GUTTERS



AUTO/ROLLER DOORS



HEIGHT SAFETY



SECURITY SERVICES



ELECTRICAL SERVICES

*Jani-King does not meet the thresholds to require mandatory reporting to the ABF, however this modern slavery statement has been submitted to the ABF as a voluntary statement.*

# Our Locations



## Centre Office

ACN: 059 349 389  
ABN: 19 424 723 998

## Adelaide - Jani-King (SA) Pty Ltd

ACN: 070 416 796  
ABN: 48 022 493 800  
1 Avonmore Avenue, TRINITY GARDENS SA 5068  
Phone: 08 8431 7766  
Email: jksa@janiking.com.au

## Darwin - Jani-King (NT) Pty Ltd

ACN: 088 220 562  
ABN: 48 479 541 155  
ABN: 86 749 822 725  
Level 16, 19 Smith Street, DARWIN CITY NT 0800  
Phone: 1300 364 694  
Email: jknt@janiking.com.au

## Brisbane - Jani-King Australia Pty Ltd

ACN: 059 349 389  
ABN: 19 424 723 998  
Suite 1, Level 1 349 Coronation Drive,  
MILTON QLD 4064  
Phone: 07 3878 5677  
Email: jkqld@janiking.com.au

## Canberra - Jani-King (ACT) Pty Ltd

ACN: 158 503 489  
ABN: 56 623 044 970  
C/- 102/29-31 Solent Circuit  
Norwest, 2153 Australian Capital Territory, Australia  
Email: jkact@janiking.com.au

## Hobart - Jani-King (TAS) Pty Ltd

ACN: 108 274 942  
ABN: 79 378 949 020  
Level 3/85 Macquarie Street, HOBART TAS 7000  
Phone: 03 6270 2270  
Email: jktas@janiking.com.au

## Melbourne - Jani-King (VIC) Pty Ltd

ACN: 079 112 593  
ABN: 86 117 945 580  
13 Business Park Drive, NOTTING HILL VIC 3168  
Phone: 03 9265 2200  
Email: jkvic@janiking.com.au

## Sydney - Jani-King (NSW) Pty Ltd

ACN: 070 416 812  
ABN: 81 866 525 035  
102/29-31 Solent Circuit, NORWEST NSW 2153  
Phone: 02 8851 5225  
Email: jkns@janiking.com.au

## Perth - Jani-King (WA) Pty Ltd

ACN: 070 416 750  
ABN: 38 912 581 242  
85 Burswood Road, BURSWOOD WA 6100  
Phone: 08 9473 8555  
Email: jkwa@janiking.com.au

# Our Vision

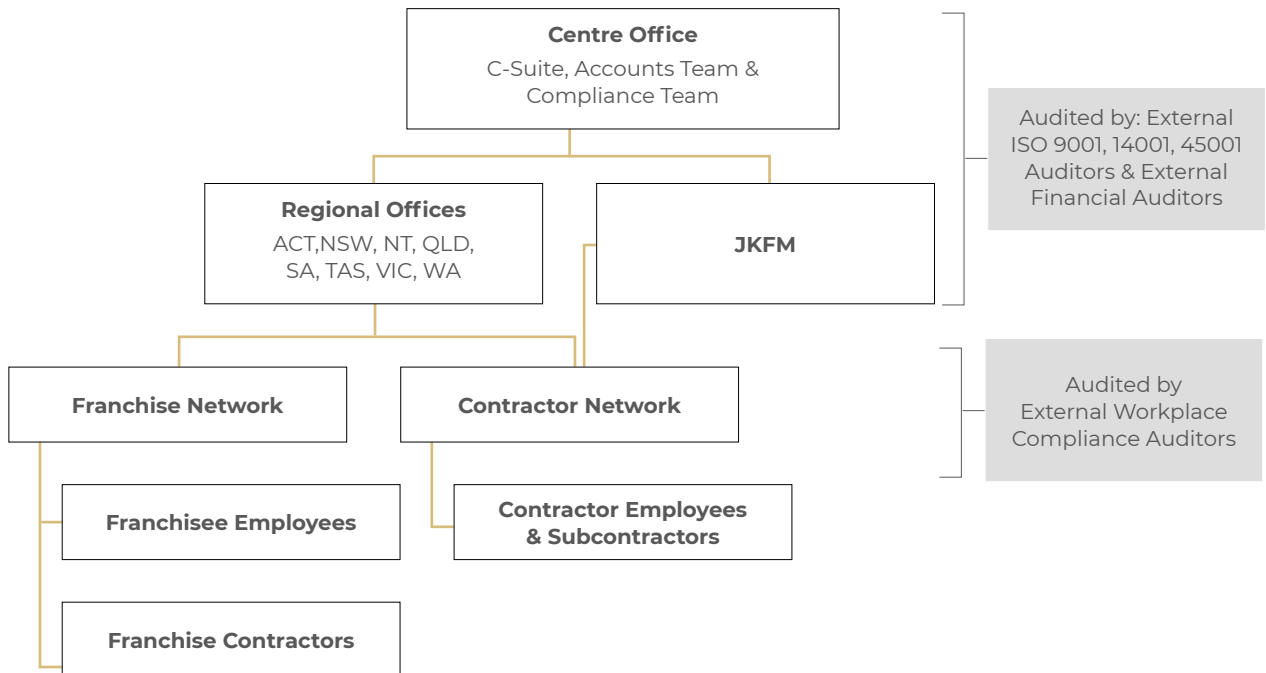
To be the Australian leader in the provision of commercial cleaning services, recognised for our professionalism and quality of training.



# Company Values



# Jani-King Structure



# Our Human Rights Commitment

## Our Commitment

We are committed to ensuring that our products and services are sourced ethically and responsibly. We do this by working with suppliers and service providers to continuously improve social and environmental practices within our entire supply chain and business.

By living our values and operating sustainably, we will continue to “build the best”, working closely with our service providers, suppliers and business partners to achieve long term, sustainable supply chains that deliver benefits to all stakeholders involved in the supply of Jani-King services to our customers.

We require all of our suppliers and service providers to adhere to this human rights commitment.

## Ethical Sourcing & Workplace Compliance Program

Jani-King has introduced an ethical sourcing and workplace compliance program that provides a framework for us to assess working conditions to ensure they meet or exceed minimum local standards. It also acts as a model process for our franchisees, contractors and suppliers or service providers who may be undertaking the establishment of their own Ethical Sourcing Program, to assist in compliance with our trading terms and requirements.

Our Ethical Sourcing & Workplace Compliance Program outlines a minimum set of standards, assessment and monitoring processes that are aligned with Jani-King’s and other globally accepted good practice standards.

Our expectation is that all Franchisees, contractors, service providers and suppliers (including their own suppliers, agents, factories or subcontractors) who supply products or services, or are a part of the Jani-King system adhere to the Ethical Sourcing & Workplace Compliance Program that is relevant to their business and supply chain and is aligned with our minimum standards. In this program, references to a ‘Franchisee’, ‘contractor’, ‘supplier’ or ‘service provider’ include any upstream suppliers, agents or subcontractors engaged by the entity trading with Jani-King. Jani-King expects each of its Franchisees, contractors, suppliers and service providers to ensure compliance with these requirements by each entity within its supply chain.

Each of our employees, franchisees and contractors are required to read and formally agree to comply with our Ethical Sourcing Code of Conduct and our Workplace Compliance Policy which outline our ethical sourcing and workplace compliance program.



# Jani-King Supply Chain

Our supply chain can be broadly grouped into the following categories:

- Suppliers of professional services
- Franchisees and their workers
- Contractors providing cleaning and facility maintenance services
- Suppliers of goods for use on client premises
- Suppliers of goods used internally
- Indirect suppliers

We recognise that modern slavery risks can occur in both our Australian and overseas supply chains.

# Risk Assessment

The Modern Slavery Act 2018 (Cth) (Act) defines modern slavery to include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services.

Jani-King Australia have a robust suite of resources, policies and procedures as well as a grievance policy to ensure we can identify and mitigate any potential risk of modern slavery before it occurs. These processes and our ongoing communication and training sessions with our worker groups have resulted in an assessment of the risk of modern slavery within our operations as low. Our risk assessment is outlined below:

Area of risk	Hazard/Risk	Control Measures/Opportunities
Debt Bonded Labour	<ul style="list-style-type: none"> <li>• Payment of excessive recruitment fees</li> <li>• Retention of identification documents</li> </ul>	<p><b>OPERATIONAL</b></p> <ul style="list-style-type: none"> <li>• Recruitment primarily completed internally – ensuring no recruitment fees are payable by worker</li> <li>• Identification provided by potential employees or franchisees is protected from access by unauthorised persons, and subject to the Privacy Policy</li> <li>• Workers and Franchisees not required to lodge any form of financial deposit or their original identification papers</li> <li>• Workers and Franchisees free to leave their work arrangement after reasonable notice in line with Australian regulations and the Franchise Agreement</li> <li>• Subcontractor Engagement and Management Procedures</li> <li>• Ethical sourcing code of conduct</li> <li>• Jani-King Code of conduct</li> <li>• Employment Agreements in line with and regularly reviewed against the FairWork Act</li> </ul> <p><b>SUPPLIER</b></p> <ul style="list-style-type: none"> <li>• Source Australian Made and Owned wherever possible</li> <li>• Using accredited suppliers (who have completed external audits – e.g. ISO similar)</li> <li>• Contractor Agreements</li> </ul>
Forced Labour	<ul style="list-style-type: none"> <li>• Restrictions of movement</li> <li>• Intimidation</li> <li>• Threats</li> </ul>	<p><b>OPERATIONAL</b></p> <ul style="list-style-type: none"> <li>• Obtain copy of ID, licences and qualifications of employees, franchisees or contractors before commencement of work</li> <li>• All employees, franchisees and their employees required to wear a security ID badge – this badge is only issued after a police check has been completed</li> <li>• Workers not required to lodge any form of financial deposit or their original identification papers</li> <li>• Workers and Franchisees free to leave their work arrangement after reasonable notice in line with Australian regulations and the Franchise Agreement</li> <li>• Ethical sourcing code of conduct</li> <li>• Jani-King Code of conduct</li> <li>• Employment Agreements in line with and regularly reviewed against the FairWork Act</li> </ul>



Area of risk	Hazard/Risk	Control Measures/Opportunities
		<p><b>SUPPLIER</b></p> <ul style="list-style-type: none"> <li>• Using Australian Businesses</li> <li>• View all insurances, licences and qualifications of contractors before commencement of work</li> <li>• Contractor Agreements</li> </ul>
Child Labour	<ul style="list-style-type: none"> <li>• Using under age workers to complete work</li> </ul>	<p><b>OPERATIONAL</b></p> <ul style="list-style-type: none"> <li>• Obtain copy of ID, licences and qualifications of employees before commencement of work</li> <li>• Young workers (aged 15 – 18) will not be permitted to work during evening hours</li> <li>• Local law to be followed</li> <li>• Regular workplace compliance audits completed by external supplier on all Franchisees and Contractors</li> <li>• Ethical sourcing code of conduct</li> <li>• Workplace Compliance Policy</li> </ul> <p><b>SUPPLIER</b></p> <ul style="list-style-type: none"> <li>• Using Australian Businesses</li> <li>• View all insurances, licences and qualifications before commencement of work</li> <li>• Contractor agreements</li> </ul>
Exploitation of migrant workers	<ul style="list-style-type: none"> <li>• Migrant Workers desperate for work, so accept harsher conditions</li> </ul>	<p><b>OPERATIONAL</b></p> <ul style="list-style-type: none"> <li>• Employees undergo police checks before commencement</li> <li>• Vevo/right to work checks completed on any workers who are not Australian Citizens</li> <li>• Subcontractor Engagement and Management Procedures</li> <li>• Regular workplace compliance audits completed by external supplier on all Franchisees and Contractors</li> <li>• All workers required to wear a security ID badge – this badge is only issued after a police check has been completed</li> <li>• Ethical sourcing code of conduct</li> <li>• Code of conduct</li> <li>• Franchise Agreement</li> </ul> <p><b>SUPPLIER</b></p> <ul style="list-style-type: none"> <li>• Using Australian Businesses wherever possible</li> <li>• View all insurances, licences and qualifications of contractors before commencement of work</li> <li>• Australian qualified workers used</li> <li>• Contractor agreement</li> </ul>
Deceptive recruitment	<ul style="list-style-type: none"> <li>• Workers promised certain jobs, benefits or conditions</li> </ul>	<p><b>OPERATIONAL</b></p> <ul style="list-style-type: none"> <li>• Job descriptions provided to, and signed by worker, before commencement of employment,</li> <li>• Internal recruitment to ensure business knows promises that were made to workers</li> <li>• Contracts provided for workers to sign prior to commencing employment</li> <li>• Subcontractor Engagement and Management Procedures</li> <li>• Employee hotline available for all workers (including those employed by franchisees)</li> <li>• Ethical sourcing code of conduct</li> <li>• Code of conduct</li> </ul>

Area of risk	Hazard/Risk	Control Measures/Opportunities
		<p><b>SUPPLIER</b></p> <ul style="list-style-type: none"> <li>• Using Australian Suppliers wherever possible</li> <li>• If labour hire is used, recruitment only undertaken with reputable recruitment agencies including labour hire licensed and RCSA Accreditation prior to a partnership being formed</li> <li>• Contractor agreements</li> </ul>
<p>Underpayment of wages</p>	<ul style="list-style-type: none"> <li>• Workers not paid for hrs worked</li> <li>• Workers paid less than minimum wage</li> <li>• Workers paid cash</li> </ul>	<p><b>OPERATIONAL</b></p> <ul style="list-style-type: none"> <li>• All wages are paid through bank transfer</li> <li>• Workers paid as per the award rates</li> <li>• Wages paid directly, on a regular basis &amp; on time</li> <li>• Process in place for workers to discuss concerns with management if they believe they were underpaid</li> <li>• Accurate record keeping</li> <li>• Training provided to payroll team to ensure wages are paid correctly</li> <li>• Employee hotline available for all workers (including those employed by franchisees)</li> <li>• Regular workplace compliance audits completed by external supplier on all Franchisees and Contractors</li> <li>• Strict sales quotation formulas to ensure at least minimum wage rates can be paid to workers by franchisees and contractors</li> <li>• Updates to award rates and employment standards communicated with entire franchise and contractor network on a regular basis</li> <li>• Ethical sourcing code of conduct</li> <li>• Franchise Agreement</li> <li>• Workplace Compliance Policy</li> </ul> <p><b>SUPPLIERS</b></p> <ul style="list-style-type: none"> <li>• Only Approved Suppliers/Contractors used</li> <li>• Contractor agreements</li> </ul>
<p>Unlawful withholding of wages</p>	<ul style="list-style-type: none"> <li>• Wages not paid in full</li> <li>• Wages not paid until specific business requirements met</li> </ul>	<p><b>OPERATIONAL</b></p> <ul style="list-style-type: none"> <li>• Process in place for internal workers and franchisee employees to discuss concerns with the wages received</li> <li>• Accurate record keeping</li> <li>• Employee hotline available for all workers (including those employed by franchisees)</li> <li>• Regular workplace compliance audits completed by external supplier on all Franchisees and Contractors</li> <li>• Ethical sourcing code of conduct</li> <li>• Code of conduct</li> <li>• Franchise Agreement</li> <li>• Workplace Compliance Policy</li> </ul> <p><b>SUPPLIERS</b></p> <ul style="list-style-type: none"> <li>• Business ABN checks and Creditor Watch monitoring of suppliers</li> <li>• Contractor Agreements</li> <li>• Choose Australian Suppliers wherever possible</li> </ul>

Area of risk	Hazard/Risk	Control Measures/Opportunities
Excessive work hours	<ul style="list-style-type: none"> <li>Workers forced to work excessive hours</li> </ul>	<p><b>OPERATIONAL</b></p> <ul style="list-style-type: none"> <li>Training provided outlining maximum hours workers are legally allowed to work</li> <li>Employee hotline available for all workers (including those employed by franchisees)</li> <li>Compliance audits completed by external supplier</li> <li>Workplace Compliance Policy</li> <li>Fatigue Training</li> </ul> <p><b>SUPPLIERS</b></p> <ul style="list-style-type: none"> <li>Subcontractor Agreement</li> </ul>
Inflated Loans to be paid back to employer	<ul style="list-style-type: none"> <li>Workers charged interest when loaned money</li> </ul>	<p><b>OPERATIONAL</b></p> <ul style="list-style-type: none"> <li>Loans are not offered to workers</li> <li>Wages cannot be taken in advance of the work they complete</li> </ul>

## Assessing The Effectiveness Of Our Control Methods

We assess the control methods listed above on an annual basis as a minimum.

Our assessment methods include:

- External workplace compliance audit reports and trend analysis
- ISO audits (both internal and external)
- Management Review
- Financial Audits
- Supplier Reviews
- Feedback provided by workers, franchisees, franchisee workers and contractors

# Consultation

We consult with our workers, franchisees, contractors, clients, suppliers and other stakeholders on a regular basis through:

- Supplier meetings, questionnaires and reviews
- Franchisee Business Support Catch Ups
- Franchisee & Contractor Workplace Compliance Audits
- Worker induction and training programs, ensuring all workers are properly inducted and advised all channels for feedback before they commence work
- Documented Employee Performance reviews
- Official feedback processes
- Grievance procedure
- Safety Refresher Meetings (Toolbox Talk style ) to discuss issues within the workplace
- Regular client meetings
- Management meetings



Ben Stoltz

**CEO**

**Jani-King Australia**

Date: 13th October 2021