

2022 Modern Slavery Statement



consolidated



Mandatory reporting criteria

- *Identify the reporting entity*
- *Describe the entity's structure, operations and supply chains*
- *Describe the risks of modern slavery in the operations and supply chains of the reporting entity and entities it owns or controls*
- *Describe actions taken by the entity and entities it owns or controls to assess and address the risks (this includes due diligence and re-mediation)*
- *Describe how the reporting entity assesses the effectiveness of the actions*
- *Describe the process of consultation with entities that the reporting entity owns or controls*

Our Modern Slavery Statement

This is our third Modern Slavery Statement produced in accordance with the reporting requirements under the Modern Slavery Act 2018 (Cth), which was approved by the Board on **23 December 2022**.

This Statement reflects work undertaken by Consolidated to address modern slavery risks in our supply chains and operations during the 2021-22 Australian financial year (Reporting period).

Any feedback or queries relating to our Modern Slavery Statement can be sent to:

Consolidated Property Services (Aust) Pty Ltd (ABN: 54 006 727 484)

144 Moray Street South Melbourne VIC 3205

T: 03 8633 8200

E: info@consolidated.com.au



Our collaborative partnerships

Consolidated Property Services (Aust) Pty Ltd have worked with these industry groups to enhance our understanding of modern slavery risks and actions.

We acknowledge the contribution of these partners during the reporting period and are referenced throughout this statement.

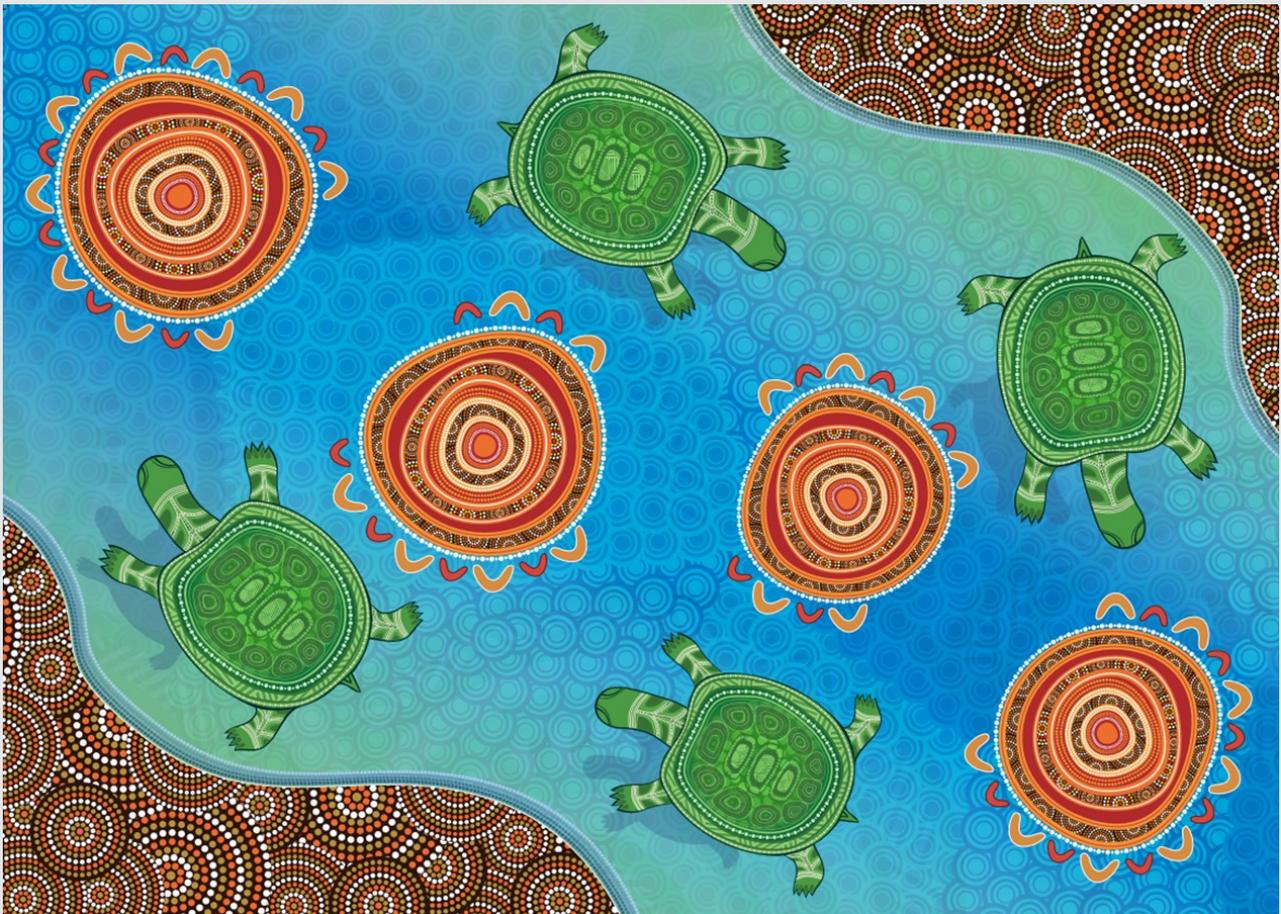


Acknowledgement of Country

Consolidated Property Services (Australia) Pty Ltd acknowledges the Traditional Owners of Country throughout Australia.

We recognise the significant importance of their cultural heritage, values and beliefs and how these contribute to the positive health and wellbeing of the whole community.

We pay our respects to Elders past and present.



About the Artist

Gary Saunders is a proud Bangerang, Wiradjuri, Yorta Yorta and Dja Dja Wurrung man, born in Shepparton and raised in Mooroopna in the Goulburn Valley area.

Gary is an Artist, Graphic Designer and Musician and manages the Indigital Centre which is based at the Aborigines Advancement League in Thornbury, Victoria.

Message from the CEO



At Consolidated Property Services Pty Ltd (Consolidated) we understand that the nature of our business means we are exposed to potential modern slavery risks across our operations and supply chain and we are committed to taking action and responding to this problem .

Cleaning has been identified as a high risk category in regards to modern slavery due to the material risks associated with various forms of indirect employment: labour hire; contracting and subcontracting.

At Consolidated, we are proud of the fact that 100% of our staff are directly employed, and we do not partake in the various forms of indirect labour, giving us greater control and oversight of modern slavery risks in our business.

Within our direct business operations, the risk of modern slavery may be low. However, the exposure of our business to the possibility of modern slavery (directly or indirectly) is still present through our supply chain.

We believe that it is the professional and moral duty of every person at Consolidated to report any suspicions they have of modern slavery in our supply chain.

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.

As part of Consolidated's contribution to discussions surrounding the improvement for our cleaning staff, we continue to promote CAF amongst building management, building owners and unions ensuring that we are across this framework to better integrate this across the industry. Consolidated fully supports the CAF principles as they are aligned with our values. It highlights the importance of responsible contracting practices.

A handwritten signature in blue ink, appearing to read 'Arthur Mallios'. The signature is fluid and stylized, with a long horizontal stroke at the end.

Arthur Mallios

Chief Executive Officer

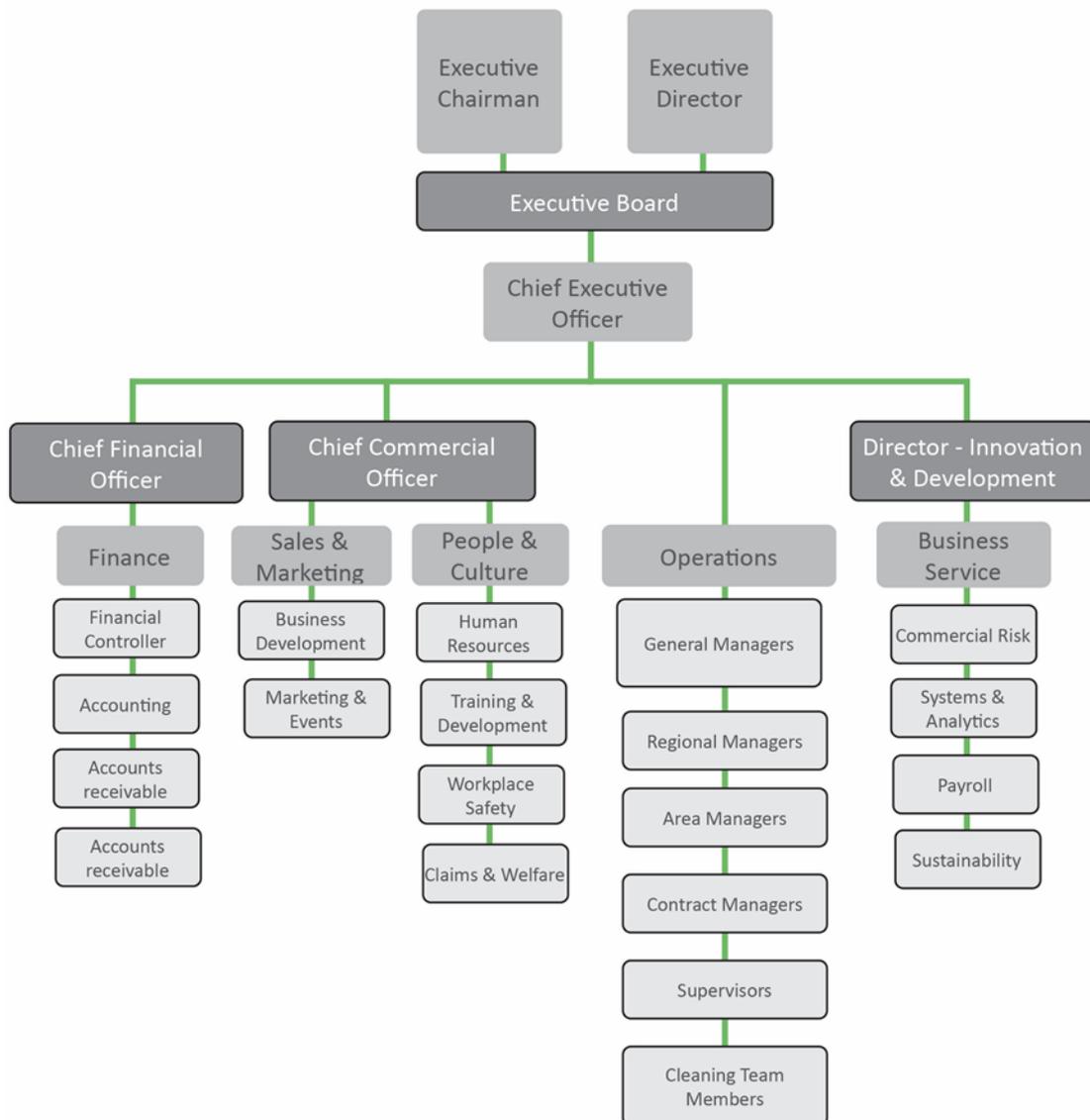
Reporting Entity

Mandatory Criteria 1 & 2

This section addresses mandatory criteria 1 and 2 of the Modern Slavery Act 2018, pursuant to sections 16(1)(a) and (b).

This section provides an outline of the Company's structure, operations and supply chains during the reporting period.

Organizational Structure



Our Business

We strongly believe that part of driving a successful business is directly giving back to the community in which we operate, in a meaningful and impactful way.

Consolidated believes our CSR Policy shall provide long-term benefits to our employees, customers, partners and individuals in all communities in which we operate, with a focus on 8 key areas:

Employees

– respecting the values of employees, providing good conditions of work and equal opportunities, improving employee satisfaction through training and career opportunities

Health & Safety

– embedded in all activities and processes and the provision of a safe work environment, wherever that may be.

Environmental Impacts

– managing business development activities in order to maximize on recycling opportunities and minimize the risk of pollution, waste and nuisance to neighbours.

Sustainable Development

– long term impacts arising from the communities that the business interacts including energy efficiency of dwellings, transport, meeting social and economic needs.

Relationships with Customers

– being responsive to customer needs and providing quality assured service that intrinsically incorporates all relevant legislative considerations.

Suppliers and Partners

– treating suppliers fairly and driving CSR codes of practice throughout the goods and services supply chain.

Community Involvement

– charitable giving and engagement with local communities through funding, support and work experience programs.

Ethos

– encouraging high standards of professionalism throughout the company and promoting best practice in respect of ethical behaviour.



Our Operations

Consolidated Property Services offers the following suite of services;

- Commercial Cleaning Services
- Waste / Recycling Management
- Environmental Consulting & Solutions
- Sanitary & Hygiene Services
- Pest Control Services
- Electrical Test & Tag Services
- Kitchen & Toilet Consumable supplies
- End of Trip Cleaning
- COVID & Infection Control Specialised cleans
- Floor Treatments & Maintenance
- Window & High Glass Cleaning
- Emergency Response Cleaning
- Specialist Cleaning & Periodicals
- Integrated Facilities Solutions
- Pressure Washing
- Laundry, Towel & Linen Services
- Escalator Cleaning
- Carpet Steam Cleaning

Consolidated operate in the following industry sectors:



COMMERCIAL CLEANING

For office cleaning requirements of all sizes and scope, we've got you covered.



EDUCATIONAL FACILITIES

We've developed EduClean, a unique system tailored specifically to service educational facilities.



RETAIL CLEANING

The retail industry relies on specialised and experienced cleaning solution partners.



INFECTION CONTROL

We can provide independently assessed Infection Control Cleaning to protect your business in the event of an outbreak.



INDUSTRIAL SERVICES

Industrial cleaning requires a comprehensive and robust cleaning solution.



SPECIAL OPERATIONS

When an emergency strikes, you need to rely on a quick and efficient solution.



Proven track record

- *45+ years' experience cleaning premium & A Grade assets*
- *Australian owned and operated servicing blue chip customers*
- *Over 3000 staff servicing more than 350 contracts throughout Australia*
- *Strong relationship with Industry stakeholders*
- *Experienced and dedicated team*



Ethical & Compliant Provider

- *Industry Preferred Supplier*
- *Multi-site, multi-state CAF 3-star accredited buildings*
- *All Consolidated staff directly employed*
- *All wages and entitlements compliant with relevant industrial instruments*
- *We do not engage labour hire or sub-contracting*
- *CAF 3 star Prequalified Contractor*



Our People & Safety Program

- *Industry Employer of Choice*
- *Heavy investment in training, development, recognition and reward programs for staff at all levels of the business*
- *BE SAFE safety program is the foundation for all learning*
- *ISO Certification for:*
 - *Quality (ISO 9001:2015)*
 - *Safety (ISO 45001:2018)*
 - *Environment (ISO 14001:2015)*

Our Income and Procurement



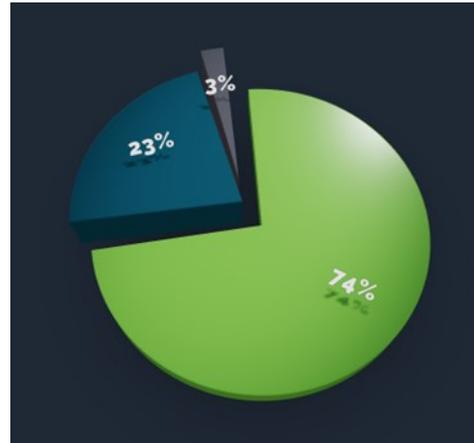
Annual Revenue — FY22

\$177 MILLION

FY22 Revenue

Breakdown by Sector

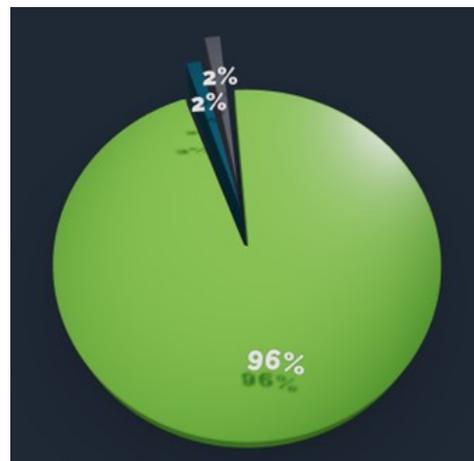
- 74% Commercial
- 23% Retail
- 3% Education



FY22 Revenue

Breakdown by Service

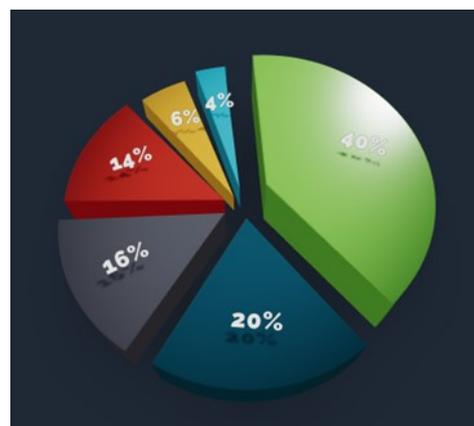
- 96% Commercial Cleaning
- 2% Rechargeables
- 2% Waste



FY22 Procurement

Spend Breakdown

- 40% Chemicals & Equipment
- 20% Waste
- 16% Rechargeables
- 14% Specialist Contractors
- 6% Consulting
- 4% IT / Communications



Our Supply Chain

SUPPLIERS - Products	Product Type	Source Country
Cleaning Supplies	Cleaning Chemicals; Cleaning Cloths; Trolleys; Bins; Mops; Buckets; etc	Australia, China
Personal Protective Equipment	Disposable Gloves; Face masks; Eye Protection; Safety Boots; Reusable Gloves; Coveralls; Hi-Visibility vests; Hats; Hand Sanitiser	Australia, China
Uniforms	Shirts; Pants; Name badges; Jumpers; Jackets	Australia, China
Plant & Equipment	Vacuum Cleaners; Floor Scrubbing Machines; Car Park Sweepers; Robotics; Motorised Trolleys	China, Germany
Consumables	Toilet Paper; Tissues; Hand Towels; Soap	Australia, China
IT / Communication Devices	Computers; Laptops; Tablets; Telephones; Headsets; 2-way radios	China, USA
Office Supplies	Stationery; Catering; Groceries; Promotional Material	Australia, China
Vehicles	Utility vehicles; electric vehicles; ATV's	USA, Japan

SUPPLIERS - Services	Service Type
	<i>All service providers are Australian</i>
High Window Cleaning	Specialist window cleaners performing all window cleaning works above 2 metres
Sanitary / Sharps	Biohazard waste removal
Linen / Laundry Services	Laundry services for towels and linen
Waste Collection Services	Specialist waste collection services including (but not limited to): General waste; Comingle; Recyclables; Organics; E-waste
IT	3 rd party IT service provider
Telecommunications	Communications networks (Optus / Telstra)
Equipment Maintenance	3 rd party arrangements for the provision of onsite machine maintenance and repairs
Electrical Test and Tag	Electrical testing and tagging of all electrical equipment by 3 rd party specialist

Our Risks

Mandatory Criterion 3

This section addresses mandatory criterion 3 of the Modern Slavery Act 2018, pursuant to sections 16(1)(c).

This section describes the modern slavery risks in our operations and supply chains which were a priority during the reporting period.

Operational Risk

Labour exploitation in the cleaning industry is well-documented, and cleaning services have been identified by the Government as a key risk area for modern slavery in Australia.

Key drivers of non-compliance in the cleaning industry include:

- Complex subcontracting arrangements;*
- Low barriers to entry for contract service providers;*
- A largely migrant workforce, often with precarious visa conditions; and*
- 'Aggressive price competition'.*

At Consolidated, our employees have the benefit of robust corporate policies and procedures which include the requirements for compliance with applicable laws and regulations in addition to their contractual entitlements, all of which are designed to ensure that all staff are remunerated fairly and in accordance with any applicable industrial instrument and/or employment laws, and the individual is working of their own free will.

Consolidated supports the Property Council of Australia's lead in addressing modern slavery risks across the property sector by directly hiring all of our cleaning staff to perform our core cleaning work.

Consolidated endorse the Cleaning Accountability Framework (CAF) principles as their values aligned with our values, highlighting the importance of responsible contracting practices.

We have achieved CAF 3 Star Contractor Prequalified status which aids clients when wanting to achieve CAF Building Certification due to Consolidated having the right systems in place to enable the provision of decent work to cleaners at their workplace.

CAF works to improve labour practices in the cleaning industry, primarily through the CAF Building Certification process, a holistic assessment of a building or precinct's cleaning supply chain. CAF works with cleaners, tenants, contractors, property owners, facility managers, and investors across the cleaning supply chain to identify and recognise best practice approaches that support decent work for cleaners and responsible business practices in the property services industry.

Our Supply Chain

Monitoring modern slavery risk involves ongoing assessment of risk within our organisation and supply chain. Consolidated conduct an annual assessment of risk as mandated by the Modern Slavery Act 2018 (Cth).

Monitoring risk is conducted on an ongoing basis through:

- *Quarterly risk reports*
- *Periodic assessment of suppliers*
- *Monitoring and responding to grievance reports*
- *Staying up to date with relevant news, regulatory changes, and industry reports*
- *Communicating regularly with suppliers*

Three effective ways of managing modern slavery risk are:

- *Building strong relationships with our suppliers*
- *Reducing exposure to risk by assessing suppliers prior to engagement*
- *Incorporating modern slavery risk into the our standard risk management practices and reporting standards*

Our tier 1 supply chain consists of local suppliers who source their materials and products from many countries worldwide, with the majority of Tier 2 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 manage all of our Suppliers through our Cm3 supplier portal, and 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. All suppliers are required to complete our annual Modern Slavery questionnaire as well as agree to the 'Code of Conduct for suppliers' which is devised in accordance with the Universal Declaration of Human Rights (UDHR).



Our Actions

Mandatory Criterion 4

This section addresses mandatory criterion 4 of the Modern Slavery Act 2018, pursuant to sections 16(1)(d).

This section provides outlines steps taken to assess and address modern slavery risks in our operations and supply chains during the reporting period.

During the reporting period, we focused our activities shaped by our assessment and prioritisation of our modern slavery risks. These activities were targeted at building our understanding and capabilities, improving our policies and processes and enhancing engagement with our supply chain.

Building our Understanding and Capabilities

Working Group

The Consolidated Modern Slavery Working Group continues to ensure compliance with our reporting requirements under the Modern Slavery Act. This group includes representatives of Consolidated's Compliance, Risk, Procurement, Sustainability and People & Culture business units. During the reporting period, key members of our Modern Slavery Working Group attended seminars and networking groups (including the United Nations Global Compact) to share knowledge, learnings and best practice in relation to modern slavery.

Modern Slavery Training

During the reporting period we developed a bespoke modern slavery training module designed to raise awareness about modern slavery and provide guidance on how to recognise and respond to modern slavery. This course was deployed to employees across our business due to the fact cleaning has been recognised as a key risk area for modern slavery in Australia.

“Cleaning has been recognised as a key risk area for modern slavery in Australia by the Department of Home Affairs. Withholding of wages, immigration-related coercion and threats, deceptive recruitment, excessive overtime, debt bondage, confiscation of personal and travel documents, and dangerous and substandard working conditions are all practices that are found in the cleaning industry in Australia.”

- [Modern Slavery \(cleaningaccountability.org.au\)](https://cleaningaccountability.org.au)

Improving our Policies and Processes

Supplier Code of Conduct

Consolidated's Supplier Code of Conduct sets out what we believe is the right way of doing business and provides a practical guide about the behavioural standards we expect in all business activities. During the reporting period we reviewed and updated our Supplier Code of Conduct to incorporate modern slavery related human rights and other human rights that are important to our business activities. The supplier Code of Conduct is a mandatory requirement for all suppliers to work with Consolidated Property Services.

Resourcing and Engagement

Consolidated is committed to following best practice recruitment and selection processes that deliver the most suitable candidates to all positions in the business in a fair, transparent, ethical and consistent manner.

During the reporting period, we expanded our recruitment team by four people to emphasise our commitment to the respect of human rights in the recruitment and selection practices and to prohibit conduct that may be indicative of modern slavery, such as the forced surrender and/or forced retention of original identification documents.

Employee Grievance Procedure

Consolidated is committed to ensuring responsible corporate governance in line with our core value of legally and ethically. During the reporting period we supplemented our whistleblowing procedure with an employee grievance procedure that can be effectively used by employees and other stakeholders to report improper, unethical or illegal conduct, including concerns relating to modern slavery. This procedure provides guidance and prescribes methods by which staff are empowered and encouraged to act on issues of concern.





CAF Contractor Prequalification renewal

Contractor Prequalification is an assessment of a cleaning contractor's HR systems, policies and procedures against the CAF 3 Star Standard.

A cleaning contractor that is CAF Prequalified can signal to existing and potential clients that the company has:

- *adequate management systems in place to provide correct wages and conditions and superannuation, including appropriate record keeping systems;*
- *processes to educate cleaners about their workplace rights and conditions of employment policies, procedures and systems in place to provide cleaners with paid and unpaid leave entitlements;*
- *systems to verify and monitor visa holders' right to work in Australia*
- *financial viability;*
- *systems for the responsible management, monitoring and enforcement of labour subcontracting;*
- *adequate WHS systems, policies and procedures to provide cleaners with a safe work environment;*
- *mechanisms in place to reduce the risk of worker exploitation, e.g. sham contracting, underpayment, modern slavery, etc., and considered ways in which it can provide cleaners with job security at a change of contract.*



Assessing Effectiveness



Mandatory Criterion 5

This section addresses mandatory criterion 5 of the Modern Slavery Act 2018, pursuant to sections 16(1)(e).

This section provides an outline steps taken by the Company to review the effectiveness of actions to assess and address modern slavery risks during the reporting period.

Consolidated Property Services recognizes that assessing the effectiveness of our actions is a key element of our commitment to continuous improvement. The ways in which we measure effectiveness are listed below. Insights gathered from these measures inform our Modern Slavery strategy and the scope of work for the Modern Slavery Working Group.

- *Regularly reviewing our progress agreed KPI's within the Modern Slavery Working Group reporting to the Board of Directors*
- *Regularly reviewing and assessing the effectiveness of our policies, codes, operating standards and procedures as they relate to modern slavery*
- *Monitoring frequency and trends of whistleblowing and grievance channels. During the reporting period, we did not identify any potential modern slavery risks from the incidents raised via these mechanisms*
- *Rates of completion of training. In the reporting period 70% of eligible participants completed modern slavery training*
- *Engagement with suppliers beyond initial assessment via the annual modern slavery due diligence checks conducted to enhance awareness of modern slavery*

Process of consultation within the organisation

We have a working group that meets to discuss and manage our approach to modern slavery, and share information and resources relevant to the management of modern slavery risk. This group includes representatives of Consolidated's Compliance, Risk, Procurement, Sustainability and People & Culture business units, all of whom are accountable for their functional areas across all business units.

In relation to our supply chain risk, procurement representatives from all of our business units meet bi-monthly during the reporting period, with a standing agenda item in relation to our modern slavery risk program.



Contact Details | Public Enquiries

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