



GJK FACILITY SERVICES
MODERN SLAVERY AND
HUMAN TRAFFICKING
STATEMENT
1 July 2021 - 30 June 2022



FACILITY SERVICES

INTRODUCTION

This is G.J. & K Cleaning Services Pty Limited's (GJK Facility Services) third Modern Slavery Statement following the introduction of the Australian Modern Slavery Act 2018 (Cth). The purpose of this statement is to outline the evolution of our approach to ensure GJK Facility Services has robust frameworks and processes in place to minimize the risk of modern slavery occurring in our business operations and supply chain.

We recognise that slavery and human trafficking can occur in many forms including slavery, servitude, human trafficking, forced marriage, forced labor, debt bondage, child labour, and deceptive recruiting for labour or services. We are fully committed to operating responsibly to help eradicate modern slavery. Our commitment to respecting and supporting human rights is aligned to the UN 10 Guiding Principles for Business and Human Rights and Goal 8: decent work and economic growth, of the United Nations Sustainable Development Goals.

We recognise that addressing modern slavery risks can be a complex and challenging process and how we respond will evolve. We will continue to improve through our due diligence and remediation process, addressing actions identified as part of our ongoing commitment to help eradicate modern slavery.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

GJK Facility Services started as a small privately-owned commercial cleaning company in 1985.

Today we are specialists in cleaning Commercial, Government, Educational, Transport, and Healthcare facilities, providing cleaning and associated soft services to customers across Australia.

Our core facility service offering includes Cleaning, Restoration, Grounds & General Maintenance with support services including Waste Management, Pest Control, Hygiene, and Consumable Supply. These services are provided through our directly employed workforce and service partners.

GJK Facility Services is a privately owned Australian business with our Head Office based in Melbourne. We have 1837 employees across Australia and New Zealand.

In February 2022, GJK Facility Services entered into a 50/50 joint venture partnership with The Pro 1 Group Pty Ltd.

GJK Facility Services also controls GJK Facility Services NZ Limited with 100% ownership and owns 49% shareholding of Netronix Pty Ltd. On 23 October 2021, Netronix Ltd, ceased trading as GJK Indigenous Solutions and started trading as Killara Services. As of the 24th August 2021, the 75% ownership GJK Facility Services had with GJK Window Cleaning Services ceased.

All three noted businesses fall below the threshold requirements to provide a modern slavery statement and as such are not reporting entities.

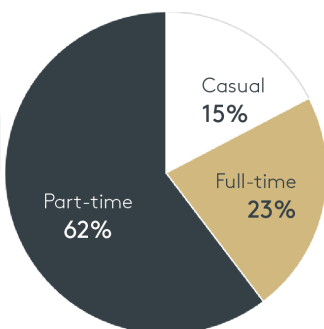
Although this Statement is for GJK Facility Services, we understand we have an obligation to identify the potential modern slavery risks within the above-mentioned entities as well as report on any actions taken in response to those risks.

SUPPLY CHAIN

categories



GJK WORKFORCE
breakdown

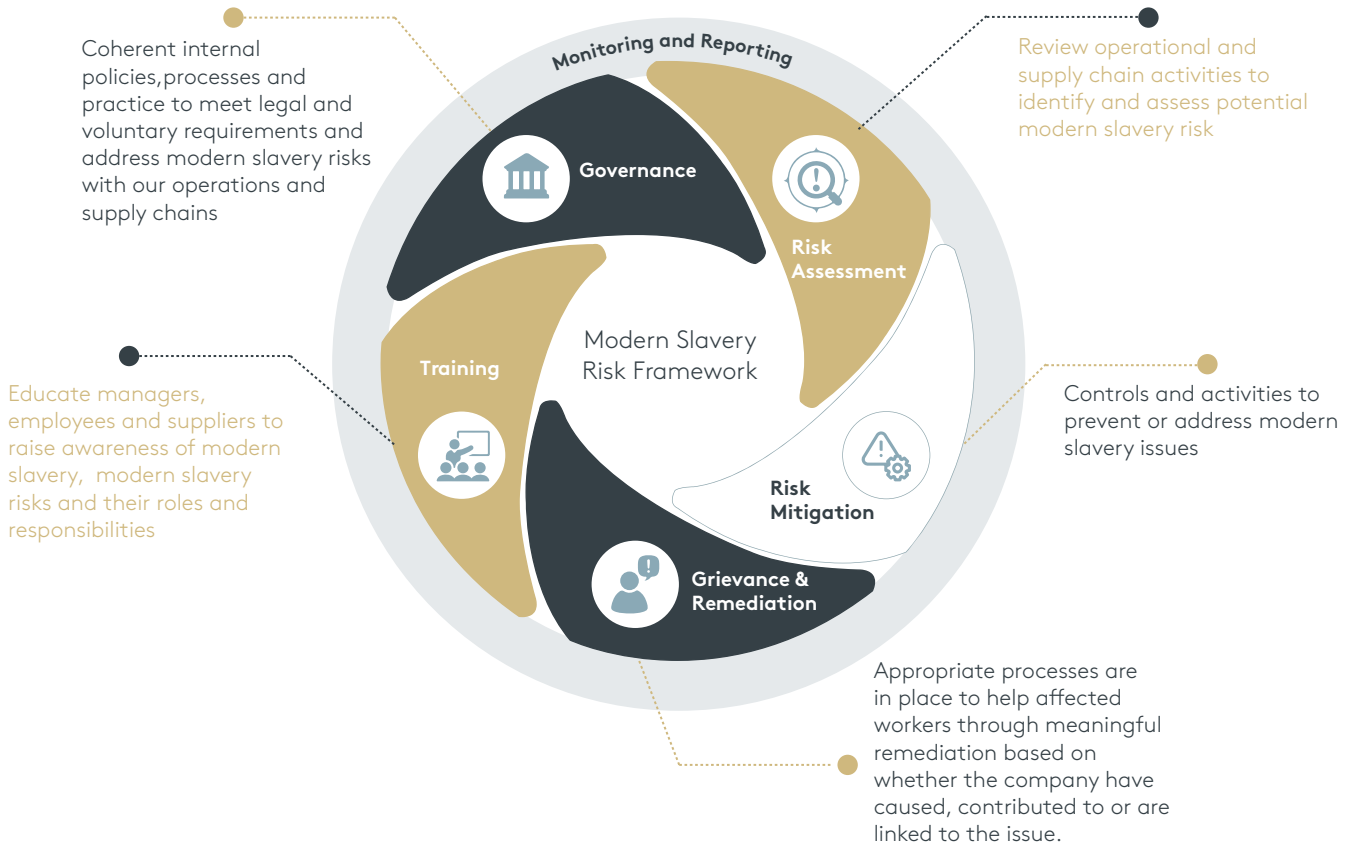


STRUCTURE	MAIN OPERATIONS	SUPPLY CHAIN
 <p>G.J. & K Cleaning Services Pty Ltd ACN 006 418 908 Registered Office: 135 Cromwell Street, Collingwood, VIC, 3066 Business Address: As above 100% ownership</p>	<ul style="list-style-type: none"> Delivering cleaning, grounds, restoration, maintenance and facility support services to our customers Sales and marketing Finance and commercial Technology People and culture Safety/compliance Customer service Account management 	<ul style="list-style-type: none"> Consumables & materials: cleaning chemicals & consumables, hygiene consumables, office supplies Equipment Vehicles Clothing: uniforms and Personal Protective Equipment clothing Electronics (hardware, software) Security Service Partners for cleaning, grounds maintenance, maintenance, pest control, industrial sweeping services
 <p>GJK Facility Services NZ Limited NZBN 9429046340313 Registered Office: Chester Grey Chartered Accountants Limited, Level 2 Van Den Brink House, 652 Great South Road, Manukau City, Auckland, NZ, 2104 Business Address: As above 100% ownership</p>	<ul style="list-style-type: none"> Delivering cleaning, waste and hygiene services to our customers 	<ul style="list-style-type: none"> Consumables & materials: cleaning chemicals & consumables, hygiene consumables, office supplies Service Partners for cleaning, waste and hygiene services
<p>GJK Window Cleaning Services ACN 614 451 802 Registered Office: 255 Port Road, Hindmarsh, SA, 5007 Business Address: 135 Cromwell Street, Collingwood, VIC, 3066 75% ownership</p>	<p>GJK Window Cleaning Services is a dormant company and not trading. As of 24th August 2021, shares no-longer owned by G.J & K Cleaning Services Pty Limited and name of GJK Window Cleaning Services changed to G & J Management Pty Ltd.</p>	
 <p>Netronix Pty Ltd Trading as Killara Services ACN 619 661 960 Registered Office: 255 Port Road, Hindmarsh, SA, 5007 Business Address: 3/629 Gardeners Road, Mascot, NSW, 5007 49% Joint Venture</p>	<ul style="list-style-type: none"> Delivering cleaning services and indigenous advice; cultural awareness training and development of indigenous people in the community, to their customers Sales and marketing Finance and commercial Technology People and Culture Safety/compliance 	<ul style="list-style-type: none"> Consumables & materials: cleaning chemicals & consumables, hygiene consumables, office supplies Equipment Vehicles Clothing: uniforms and Personal Protective Equipment clothing Electronics (hardware, software) Security Service Partners for cleaning
 <p>The Pro 1 Group Pty Ltd Trading as Pro 1 Maintenance ACN 656 633 046 Registered Office: 255 Port Road, Hindmarsh, SA, 5077 Business Address: 135 Cromwell Street, Collingwood, VIC, 3066 50% Joint Venture</p>	<ul style="list-style-type: none"> Delivering property and asset maintenance, office fits and office deficit works to customers Project management Drafting and design Account management Sales and marketing Finance and commercial HR Safety/compliance 	<ul style="list-style-type: none"> Building and maintenance materials Consumables & materials: Equipment Vehicles Clothing: uniforms and Personal Protective Equipment clothing Electronics (hardware, software) Contractors for plumbing, electrical, carpentry, painting, plastering, roofing, tiling

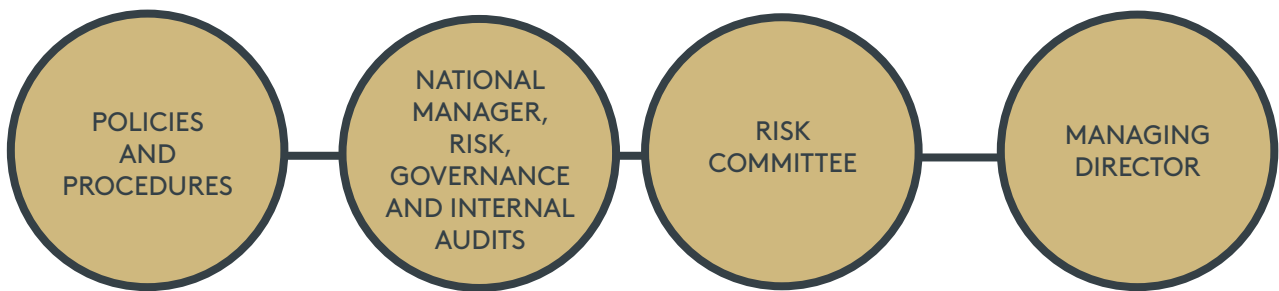
OUR APPROACH

In FY20 we commenced our Modern Slavery journey, submitting our first statement. This journey continues to be ever evolving as we learn how other companies are approaching and addressing potential modern slavery risks. As part of this journey, we have developed a framework to provide us a more structured approach in addressing modern slavery risks going forward. We have only just finalised this framework and will be implementing it during the FY23 period.

This framework will work in conjunction with our risk management approach below.



RISK MANAGEMENT APPROACH



Modern Slavery, Human Rights and Supplier Code of Conduct Policies	Monitor and review potential modern slavery risks to business	Receives regular reporting
Procurement processes in place to identify human right risks, impacts and breaches	Provides governance over modern slavery risks	Provides governance over modern slavery risks
Audits undertaken of service partners and other high risk suppliers to ensure no human right violations are occurring	Reviews and submits Modern Slavery Statement to Managing Director	Reviews and approves Modern Slavery Statement with Founder & Managing Director signature
Remediate or remove any suppliers found with critical breaches		

OUR APPROACH

OUR POLICIES AND PROCEDURES

Our accredited Integrated Management System continues to contain the policies and frameworks that support our day-to-day business operations, ensuring we comply with the laws and regulations in which our business operates, including the Modern Slavery act 2018 (Cth).

Our Modern Slavery Supplier Code of Conduct, Human Rights, and Modern Slavery policies have continued to promote the ethical behaviours we want within our operations and supply chains.

As part of our action plan and commitment to preventing human rights violations, we continued to review and work on our processes and practices.

One of these improvements was the adjustment of our grievance and reporting mechanism. Using the UN Global Compact's *Implementing Effective Modern Slavery Grievance Mechanisms – A Guidance Note for Business*, a review was undertaken of our current process, which was our Whistleblower reporting process. As a result of this review, amendments were made to our existing Whistleblower reporting process to better accommodate modern slavery grievances and an additional procedure was developed to clarify and support the investigation/remediation process for a supplier who has been involved with a modern slavery grievance.

GJK Facility Services understands that modern slavery is serious exploitation, rather than substandard working conditions or underpayment of workers, however, we also know the two can coexist (and are often related) and can be a red flag. With that said, we believe that monitoring working conditions and pay can assist in identifying and addressing potential modern slavery risks. External audits of our service partners against the Fair Work Act 2009 (Cth) and Fair Work Regulations 2019 (Cth) are undertaken to ensure various health and safety, working hours and wage requirements within same are abided by were undertaken by third-party Maddocks Lawyers, on our behalf. Ten service partners were audited during the FY22 period.

POTENTIAL RISK TO OUR OPERATIONS AND SUPPLY CHAIN

In our previous Statements, GJK Facility Services has recognised the cleaning sector as having high modern slavery risks due to the use of low-skilled labour and outsourcing to third-party contractors, where we have reduced visibility and oversight of their practices. We continue to recognise this and our business having an increased risk of potentially being linked to or contributing to modern slavery.

We are trying to mitigate these risks through the policies, processes, and practices we have implemented into our business.

As part of our due diligence process, the business undertook a large supplier scoping exercise, engaging third-party vendor iPro to use their online risk assessment system.

THE METHODOLOGY

The methodology iPro use is as follows.

The first part of the questionnaire evaluated the risk inherent to a supplier’s geography, industry and workforce. If the suppliers were operating in a low-risk industry, low-risk geography with a low-risk workforce, they were categorised as low-risk due to their low inherent risk.

If the suppliers were operating in a high-risk industry, high-risk geography and/or with a high-risk workforce, they were deemed to have a perceived inherent risk within their supply chain. Those deemed to have a perceived inherent risk were then further categorised into low, medium and high risk based on how effectively risk is mitigated through control mechanisms such as policies, procedures and practices.

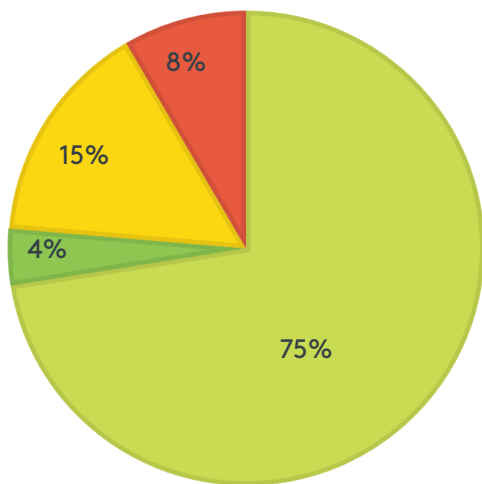
- **Low-Risk** (adequate risk control: the supplier is adequately controlling risk
- **Medium-Risk:** the supplier is partially controlling the risk
- **High-Risk:** the supplier does not have adequate risk control

We sent the questionnaire to 144 of our suppliers, with 91% completing. Of the 127 suppliers who responded to the questionnaire, 8% were evaluated as High Risk.

The main drivers of the potential high risks are:

- Suppliers identified as having operations in sectors that were identified as sectors of forced labour exploitation in the Global Estimates of Modern Slavery: Wholesale and Trade, Construction, Domestic Work and Accommodation and Food Service Activities.
- Suppliers didn’t have the appropriate policies and procedures in place prohibiting workers and agents from engaging in all forms of forced labour and human trafficking, engaging in child labour and withholding worker identity or immigration documents.
- Suppliers aren’t engaging in due diligence activities to identify, prevent and mitigate risks specific to slavery and human trafficking in their operations or direct/indirect supply chain.

The main difference between the identified medium-risk suppliers, to the high-risk, was the medium-risk suppliers declared they had human trafficking and slavery policies, processes and practices in place.



RISK SCORE CATEGORISATION

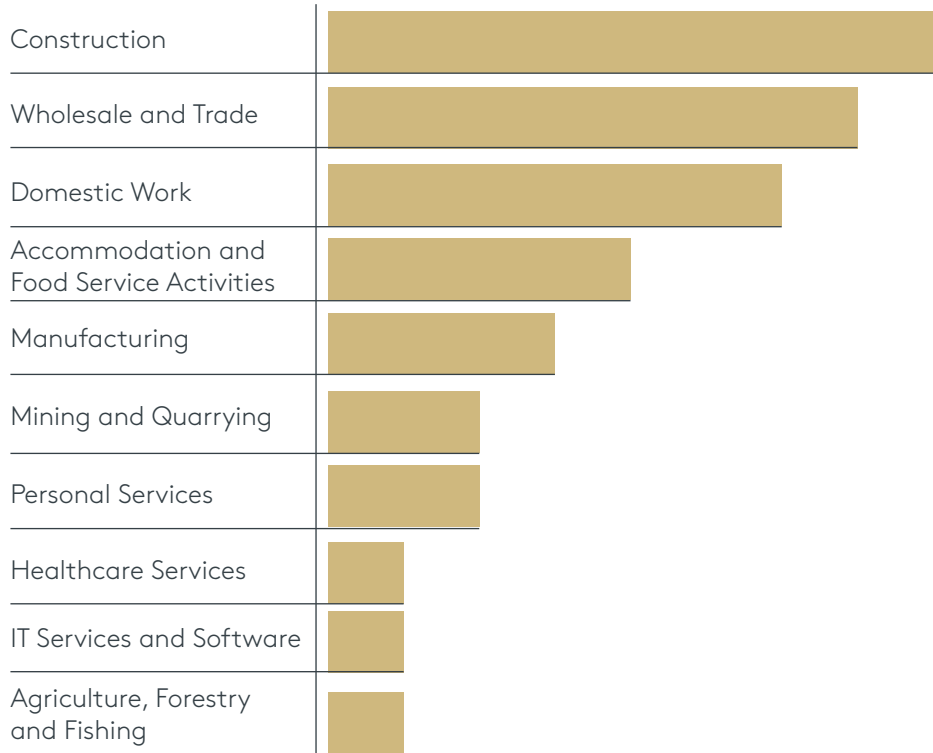
	LOW-RISK no perceived inherent risk
	LOW-RISK adequate risk control
	MEDIUM-RISK partially control risk
	HIGH-RISK do not adequately control risk

POTENTIAL RISK TO OUR OPERATIONS AND SUPPLY CHAIN

TIER 1 SUPPLIERS - SECTORS OF OPERATION

22 suppliers operate in one or more of the following sectors as represented in the below chart

105 suppliers do not operate in any of the following sectors and weren't included in the below chart.



TIER 1 SUPPLIERS - COUNTRIES OF OPERATION



POTENTIAL RISK TO OUR OPERATIONS AND SUPPLY CHAIN

GJK Facility Services recognises the diversification of our service offering through our new 50/50 joint venture with The Pro1 Group Pty Ltd (Pro1) is a new potential modern slavery risk within our operations and supply chain we need to monitor since they work in the property and construction sector, a known high risk sector for exploitative people practices such as forced or unpaid work, unsafe conditions and debt bondage. Additionally, the construction sector has an additional risk factor through the production and manufacture of raw materials. With raw materials sourced from overseas, this poses an elevated risk of modern slavery. Pro1 also relies on third-party contractors delivering their service to customers, meaning decreased visibility and oversight of their contractors practices. All of this puts GJK at risk of potentially being linked or contributing to modern slavery. To understand the potential modern slavery risk Pro1 has, a full mapping exercise of their operations and supply chain will be undertaken.

As noted in our previous Modern Slavery Statements, another identified risk to operations and supply chain is our use of third-party contractors to deliver our services. We planned to reduce the outsourcing of cleaning labour by increasing our direct labour force. However, due to COVID and labour shortages, we have needed to turn to outsourcing to meet labour needs of our customers. Once the labour shortage everyone is experiencing is resolved, we will again continue on our goal of 70/30 – 70% direct to 30% outsourcing.

During FY22, the business also decided to offshore five shared service positions through staff outsourcing provider Satellite Office Solutions Pty Ltd. This poses a potentially new modern slavery risk to the business due to geographic location and our reduced visibility and oversight of the conditions in which these workers are working.

With lockdowns still occurring during the first half of FY22 and with the labour shortages that followed due to State mandated vaccination requirements and increased COVID cases, potential modern slavery risks continued for workers within our supply chain, particularly our service partners.

We continued to mitigate these risks by maintaining strong relationships and open communication channels with our service partners, working with them and providing support such as:

- Offering service provider workers who were affected /in isolation, financial support, access to our Employee Assistance Program (EAP), and also contacting them regularly to ensure they were OK, with a support network while unwell and in isolation

SECTOR AND INDUSTRY RISKS	PRODUCT AND SERVICES RISKS	GEOGRAPHICAL RISKS
Cleaning, Security, Textiles, Property, Building	Services procurement - outsourcing Uniforms - textiles Offshore outsourcing	China, Asia, Philippines
MODERN SLAVERY RISKS	MODERN SLAVERY RISKS	MODERN SLAVERY RISKS
Non-compliance with labour standards, including health and safety, working hours, wages, forced labour, child labour and freedom of association	Non-compliance with labour standards, including health and safety, working hours, wages, forced labour, child labour and freedom of association	Forced labour / child labour and human trafficking

POTENTIAL RISK TO OUR OPERATIONS AND SUPPLY CHAIN

- Ensuring our service partners adhered to correct leave and pay provisions through open communications and external audits.

Through the processes and practices we have in place, we continue to look for potential risks within our supply chains and operations and identify improvements and actions to mitigate those risks.

ADDRESSING THE RISKS OF MODERN SLAVERY PRACTICES

Lockdowns and restrictions imposed by COVID during the first half of FY22 impacted the business's ability to implement certain activities.

The largest activity we undertook was the extensive supplier exercise we did with iPro which assisted our efforts by giving us greater visibility into our supply chain operations and helping us prioritize due diligence and risk mitigation actions. This questionnaire was sent to all our service partners and some of our larger suppliers.

As the iPro assessment was via a questionnaire, one of the first actions we undertook after analysing the data was to contact suppliers who had indicated they had policies and processes in place for modern slavery to verify by asking them to supply said documents. The comprehensiveness of these documents ranged significantly depending on supplier size.

Many of our service partners are SME cleaning businesses, falling under the \$100m Modern Slavery reporting requirements. The iPro assessment exercise highlighted we need to undertake significant work with our service partners to improve the awareness, knowledge, and understanding of modern slavery and our expectations. This will be achieved through collaboration, education, and awareness, taking them on a journey so they can improve their understanding, processes, and systems to identify and mitigate potential modern slavery risks in their operations and supply chain.

As part of this journey, we will work towards providing a series of Modern Slavery webinar sessions to educate our suppliers so they have a better understanding of what Modern Slavery is and some of the policies, processes, and practices their business should have in place to address it, the red flags of Modern Slavery and steps for preventing harm, why it is relevant to the cleaning sector and our expectations when working with GJK Facility Services when it comes to Modern Slavery. Once this education piece is undertaken, we will start working closely with the identified potential high-risk service partners/suppliers, and working through to the medium-risk to support them in developing the required policies, processes, and practices. We will guide them to resources already available, such as the Resource section of the Australian Border Force website and reputable organizations like Walk Free.

Since partnering with Pro1, we have been working with them to review the potential Modern Slavery risks within their operations, through a review of their current internal processes and practices. Next we will be issuing their suppliers a Modern Slavery Questionnaire to determine the potential Modern Slavery risks within their supply chain so we can then help them develop a robust plan to manage Modern Slavery risks going forward.

ADDRESSING THE RISKS OF MODERN SLAVERY PRACTICES

During this reporting period, we engaged Modern Slavery consultants Point Advisory to help develop this training for our suppliers/service partners which they will start delivering at the start of FY23. A recording of the training will also be taken and used as part of our supplier/service partner onboarding process.

We also undertook training with our employees to increase their awareness and understanding of Modern Slavery. Point Advisory delivered specific Modern Slavery training to the Executive Team to increase their understanding of Modern Slavery, the potential business risks, and the reporting requirements under the Act. An online training module was also developed and sent to our employees to complete. This included using Be Slavery Free's video on What is Modern Slavery to help explain Modern Slavery, and that it does happen here in Australia. The training module also explained the processes and systems the business has in place to identify and mitigate potential Modern Slavery risks and how they can report suspected Modern Slavery. At the end of this reporting period, 73% of our employees had completed this training.

We note the new potential risk offshoring shared services resources poses to the business. A risk mitigation plan has been developed specifically for these offshore workers.

Part of this plan is to:

- Undertake yearly audits through our auditing program.
- Provide Modern Slavery training to offshore workers.
- Provide information about GJK's grievances and reporting mechanisms they can use to raise concerns confidentially without fear of reprisal.

We continue our Modern Slavery journey, assessing potential modern slavery risks within our operations and supply chain through the processes and practices we have put in place, and will continue implementing actions to mitigate the risk of modern slavery practices.

ADDRESSING THE RISKS OF MODERN SLAVERY PRACTICES

Below we provide the business’s action plan in response to the risks already identified. As we identified further risks through our monitoring and assessment framework, additional actions will be added to this plan.

Some actions have been completed, whilst others are still underway.

Actions completed will also be assessed through the monitoring and assessment frameworks to ensure they are fit-for-purpose and embedded within our business practices.

This continual review and improvement process is key to ensuring any risks to the business are identified and addressed.

POTENTIAL MODERN SLAVERY RISK	ACTION
<p>Non-compliance with labour standards in the supply chain, including health and safety, working hours, wages, forced labour, child labour and freedom of association</p>	<p>Mapping our supply chain to understand modern slavery risks</p> <p>Undertake scoping exercise of supply chain to identify modern slavery risks to business using framework provided in the Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities:</p> <ul style="list-style-type: none"> ● Service partners - completed ● Suppliers - underway <p>Robust assessment of suppliers/service partners we work with</p> <ul style="list-style-type: none"> ● Regular internal/external audits of Service Partners and Suppliers to mitigate the risks of unethical practices in our supply chain - ongoing ● Annual iPro Modern Slavery Assessment - ongoing <p>Reduce use of labour outsourcing model to gain greater oversight/control</p> <ul style="list-style-type: none"> ● Increasing direct labour force model into business - ongoing <p>Implement modern slavery/human right elements into our processes and practices</p> <ul style="list-style-type: none"> ● Implement new Modern Slavery Assessment module into iPro (companies supplier assessment system) - completed ● Ongoing review of our processes and practices through internal audits to determine effectiveness - ongoing

ADDRESSING THE RISKS OF MODERN SLAVERY PRACTICES

POTENTIAL MODERN SLAVERY RISK	ACTION
<p>Non-compliance with labour standards in the supply chain, including health and safety, working hours, wages, forced labour, child labour and freedom of association</p>	<p>Collaborate, educate and raise awareness of modern slavery</p> <ul style="list-style-type: none"> ● Provide modern slavery training to our people to raise awareness and understanding - completed ● Collaborate with our Service Partners and Suppliers to: <ul style="list-style-type: none"> ● help raise awareness of modern slavery/human rights - underway ● help them address any identified risks - underway
<p>Non-compliance with labour standards within non reporting entities that GJK Facility Service owns or controls, including health and safety, working hours, wages, forced labour, child labour and freedom of association</p>	<p>Collaborate with associated entities of GJK Facility Services to identify and better understand potential modern slavery risks</p> <ul style="list-style-type: none"> ● Undertake mapping exercise of operations and supply chain with entities GJK Facility Services controls - underway ● Implement necessary steps to address any identified modern slavery risks ● Provide guidance and support to entity that GJK Facility Services has ownership in to help them reduce potential modern slavery risks to their operations and supply chain

This Statement was approved by the Sole Director of G.J. & K Cleaning Services Pty Limited on 13 December 2022.



George Stamas
Founder and Managing Director