

# MODERN SLAVERY STATEMENT

## 1. THE IDENTITY OF THE REPORTING ENTITY

*Provide a business overview including identifying and describing your entity.*

This modern slavery statement is made in accordance with the *Australian Modern Slavery Act 2018* (the Act) for the financial year ending 30 June 2022. The statement is jointly made by SKG Services and Indigenous Commercial Cleaning.

Established in 1977, SKG Services (SKG) provides cleaning, security and maintenance services across Australia and New Zealand.

Indigenous Commercial Cleaning (ICC) is SKG's sister company. Established in 2019 by SKG Services managing director, George Manoussakis, in partnership with young Indigenous leader, Hayden Charles, ICC is the vehicle through which we create employment and training opportunities for Australia's First Peoples.

## 2. OPERATIONS, STRUCTURE AND SUPPLY CHAINS

*Give details of your entity's operations, structure and supply chains including things like operational procurement, capital works, and corporate procurement.*

SKG Services Pty Ltd, ABN 87 658 543 581, is a privately owned Australian Company registered in New South Wales. Our head office is located at 22/205-213 Port Hacking Road, Miranda NSW 2228.

SKG is a minority (49%) co-owner of Indigenous Commercial Cleaning. As a majority Indigenous owned business, Indigenous Commercial Cleaning is registered with Supply Nation and the vehicle through which we create employment and training opportunities for Australia's First Peoples.

## 3. MODERN SLAVERY RISKS

*Identify any risks of modern slavery practices in the operations and supply chains of your business along with those of any entities that your entity owns or controls.*

Modern slavery involves the most severe forms of exploitation. It includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

Modern slavery is highly relevant to Australia owing to our extensive trade links with the APAC region, where most victims of modern slavery are based.

Moreover, modern slavery and labour exploitation in the cleaning industry is well documented.

As a significant employer, SKG is committed to ensuring modern slavery practices are not present within our business or supply chain.

We consider there to be a greater risk of modern slavery in our supply chain than in our own direct operations. The structured and embedded process of employment of personnel within our operations provides a safeguard against the risk of modern slavery practices in our engagement process.

Some of the potential risks identified in our supply chain include suppliers:

- Not complying with applicable employment laws
- Not providing a safe workplace

## Next Steps

We understand the importance of adopting a tiered approach to combat modern slavery. In the current reporting period, we will survey and analyse our 'Tier 1' suppliers, meaning those from whom we purchase directly, to assess:

- the extent to which they have mapped their own supply chain, and how:
- from which countries they source their products and services
- whether they conduct independent/unannounced audits of their suppliers
- what policies they have regarding modern slavery and human trafficking
- what standards their employees and contractors are obligated to follow, and what are the penalties for non-compliance
- what training their employees and contractors undertake regarding modern slavery
- what sanctions and remediation processes they undertake if modern slavery is identified in their supply chain
- how many employees they have, where, and what sort of employment relationship is involved
- whether they utilise any labour hire
- whether their people have access to independent whistleblowing
- whether they are free from discriminatory practices
- whether the conditions they work in are safe
- their compensation practices
- trade union access

- whether they are aware of low-skilled migrant workers working in their organisation's supply chains.

## 4. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

*Describe the actions taken by your business and any entity that it controls or owns to assess and address modern slavery risks.*

We foster a culture that supports all internationally recognized human rights and ethical sourcing practices and seeks to avoid complicity in human rights abuses, including modern slavery.

We are committed to responsible procurement and are using our sphere of influence to improve labour practices in the property services industry.

We have implemented policies, procedures, and resources to guard against human rights violations. We will dedicate time and resources to reduce the risk of modern slavery in our operations and supply chain, to develop appropriate controls and to take appropriate action if modern slavery is identified within our operations or supply chain.

Our approach to addressing modern slavery risks in the current financial year will focus on:

- conducting awareness training for staff
- auditing our 'Tier 1' suppliers
- reviewing SKG's existing policies and procedures to ensure they address issues of potential modern slavery
- reviewing our contracts of engagement to ensure they include ethical procurement clauses and a supplier code of conduct.

## 5. ASSESSMENT OF EFFECTIVENESS

*Analyse the effectiveness of your entity's actions to address modern slavery risk and identify areas for improvement.*

Our action to mitigate the risk of modern slavery are subject to review by our leadership team. We monitor conformity with all our policies and procedures, including checking compliance with our supply processes.

We have not identified any instances of modern slavery directly associated with our operations. No client or supplier has ever raised modern slavery concerns. No modern slavery related issue or concern has been submitted by any employee.

## Next Steps

To continually improve our approach, we are planning to undertake the following actions in FY2023:

<b>Policy</b>	Continue to review and update
<b>Engagement</b>	Consult/engage with our suppliers and our clients
<b>Risk</b>	Review risk profile of our supply chain
<b>Training</b>	Identify and deliver modern slavery awareness training for all staff
<b>Communication and Reporting</b>	Communicate with staff, clients and suppliers, report on findings and progress
<b>Remediate</b>	Work with the relevant parties to remediate any incidence of modern slavery practice

## 6. CONSULTATION PROCESS WITH OWNED OR JOINT REPORTING ENTITIES

*Describe the consultation process undertaken with any entities that your business owns or controls or with whom you are issuing a joint modern slavery statement.*

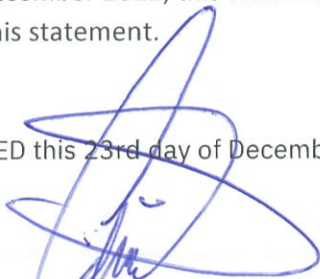
SKG's leadership team provides guidance and support on our response to modern slavery.

In preparing this statement, we engaged with each of the reporting entities covered by this statement and consulted the entities we own or control.

We make this, our inaugural modern slavery statement, as an outward demonstration of our commitment to addressing modern slavery risks.

In December 2022, this statement was approved by the boards of each of the two reporting entities covered by this statement.

DATED this 23rd day of December 2022.



GEORGE MANOUSSAKIS  
Managing Director, SKG Services and  
Director, Indigenous Commercial Cleaning



HAYDEN CHARLES  
Managing Director, Indigenous Commercial  
Cleaning and  
Director, SKG Services