



# MODERN **SLAVERY** STATEMENT

1 July 2023 to  
30 June 2024

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# Our Modern Slavery Statement

Quad Services Pty Ltd (Quad) provides cleaning, security, and building maintenance services across Australia and New Zealand. This modern slavery statement has been prepared per the Australian Modern Slavery Act 2018 (MSA) for the financial year ending 30 June 2024. It describes our actions to identify and address modern slavery risks in our supply chain and in our operations during the period under review.

Modern slavery – the perspective of modern slavery encompasses the most severe forms of exploitation, including but not limited to human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment for labour or services, and the most egregious forms of child labour. Our approach involves identifying and assessing these risks, and we are committed to taking action to minimise these risks within our operations and supply chains.



## Our Position

Quad is committed to upholding all internationally recognised human rights and ethical sourcing practices, and we actively avoid any involvement in human rights abuses, such as modern slavery.

We believe it is our responsibility to pinpoint, evaluate, and address the impacts of modern slavery within our areas of influence and operations.

To prevent any association with modern slavery or human trafficking, we have established and maintained systems and procedures. We firmly oppose any infringement or violation of human rights, and we acknowledge that our corporate and social responsibilities extend to our operations and supply chain.

We invest time and resources to mitigate the risk of modern slavery in our operations and supply chain and actively develop suitable controls. We are prepared to take prompt action if modern slavery is identified within our operations or supply chain.

In the financial year 2023-24, we focused on key strategies to address modern slavery risks, including ongoing awareness training for management and staff, implementing software to identify risks, conducting comprehensive risk assessments, reviewing Quad's policies, and actively engaging with suppliers.



## Our Approach

Quad has a modern slavery committee that helps us manage modern slavery risks. Measures include a code of conduct and a supplier code of conduct, policies and procedures such as human rights, grievance and modern slavery policies, remediation processes, and education and training programs, such as the Supply Chain School (where applicable), for all team members supporting the committee.



Message from  
**Director of Operations and Sales**



**Karl Stringer**  
*Director of  
Operations and Sales*

At **Quad Services**, we are committed to upholding human rights and ensuring that our operations and supply chains are free from modern slavery. As a leading provider of **cleaning, security, and building maintenance services**, we recognise the responsibility we have in identifying, preventing, and addressing modern slavery risks.

Over the past year, we have strengthened our approach by:

- **Enhancing risk assessments** to identify and address potential modern slavery risks in our supply chain.
- **Implementing robust governance measures**, including our Modern Slavery Committee, to drive accountability and continuous improvement.
- **Strengthening supplier engagement** through due diligence processes and ethical sourcing commitments.
- **Delivering targeted training and awareness initiatives** to ensure our employees and partners are informed and empowered to act.

We acknowledge that modern slavery is a complex global issue, and we remain committed to working collaboratively with our stakeholders, industry partners, and regulatory bodies to uphold the highest ethical standards.

Looking ahead, we will continue to enhance our transparency, refine our due diligence processes, and work closely with our suppliers to strengthen compliance and ethical sourcing.

Quad Services remains steadfast in our commitment to combatting modern slavery and fostering a business environment built on integrity, respect, and social responsibility.



**Criterion 1**

## The Reporting **Entity**

Quad Services Pty Ltd, ABN 58 000 308 592, is a privately owned Australian company registered in New South Wales. Our head office is at 12 Carlotta Street, Artarmon, NSW 2064.

Formed in 1972 by four university students, Quad has grown from a local cleaning services provider in the north shore regions of Sydney to one of the leading cleaning and associated building services providers in Australia and New Zealand, with over \$100 million in turnover.

Quad has a workforce of more than 2500 skilled, trained, and vetted professionals in cleaning, security, and maintenance. It also has over 50 experienced management staff who oversee 500+ contracts (1100+ sites) and maintain offices across all Australian states, territories, and New Zealand.

Quad is certified to the following standards:

- ISO9001 quality management system
- ISO14001 environmental management system
- ISO45001 occupational health and safety management system.

Our primary objective is to assist clients in improving their facilities' safety and environmental quality by providing world-class cleaning, security, and related services.



# Company Structure, Operations and Supply Chain

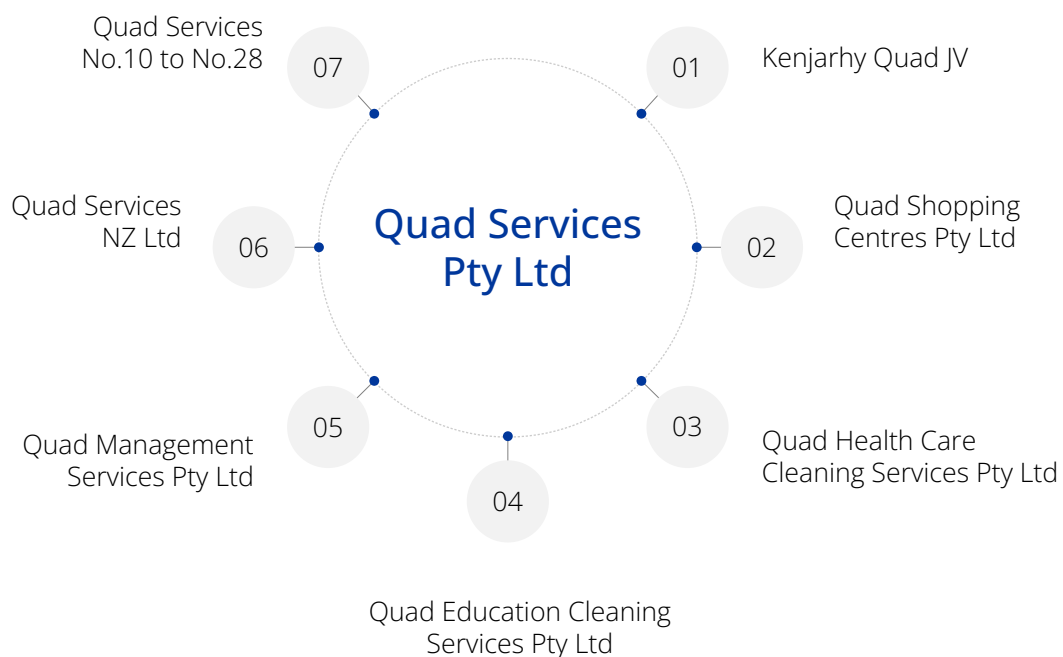
## The Quad Company Structure

Quad owns and controls several other entities for employment, administrative, and financial purposes. It operates services in New Zealand and is part of an Indigenous joint venture entity, Kenjarhy Quad Pty Ltd.

Across the group, a standard set of policies, procedures, and systems is in place and tailored to local requirements (where required).

### Quad is a member of the following organisations:

- Property Council Australia
- Building Service Contractors Association of Australia
- Australian Security Industry Association Limited
- Facilities Management Association
- Green Building Council of Australia
- Supply Nation
- United Nations Global Compact
- Science Based Targets Initiative
- Better Business Partnership
- Supply Chain Sustainability School





## Our Operations and Supply Chain

The operational framework at Quad is designed to be efficient and effective. We have organised our teams geographically so they can closely monitor on-the-ground activities and implement our policies within the operational context of each region.

These teams play a critical role in recognising and addressing potential instances of modern slavery practices in our service delivery.

While our suppliers are predominantly located in Australia and New Zealand, some of the products we receive are manufactured abroad. Through our mapping process, we have identified that some of these products come from regions, such as China, which are classified as high-risk according to the global slavery index.

To ensure that our suppliers meet our expectations and comply with regulations, we require them to undergo a thorough registration process by our compliance team.

We also mandate that service suppliers provide periodic updates during our ongoing monitoring efforts.





## Modern Slavery Risks in Our Operations and Supply Chain

Quad works to improve its risk assessment processes for operations and supply chains continually, and we are building on the foundation laid in previous years. We acknowledge and appreciate that our business activities, including operations and the supply chain, may link to modern slavery, or we may cause or contribute to it.

### Risks In Our Operations

Quad has assessed that the risk of modern slavery is higher in its supply chain than in its direct operations. Although the company's formal employment procedures help mitigate the risk of modern slavery practices in its employee engagement processes, it cannot eliminate it. Quad's structured recruitment and onboarding processes reduce the risk of modern slavery in our direct employment.

Despite our proactive approach, undesirable practices may go unnoticed unless brought to our attention. These may be brought to our attention through whistleblowing, confidential reporting, or independent third-party auditing. To confirm, Quad has an established whistleblowing policy and a confidential reporting facility to enable our team members, suppliers, and clients to raise any concerns.

In line with previous years, the key risks that we have identified as relevant to both our operations and supply chain include:



Clients with varying levels of awareness and commitment to addressing the risk of modern slavery.

Varied maturity levels among service suppliers with differing levels of awareness regarding relevant industrial laws.

Service suppliers who potentially do not ensure a safe workplace and impose expectations that could jeopardise the safety of workers while delivering services.

Quad operates in industries identified as having higher risks for labour rights violations and modern slavery. Cleaning and security businesses often attract vulnerable workers, such as migrants and non-native English speakers.

Migrant workers represent a disproportionate number of global instances of modern slavery. This vulnerability is historically exacerbated in the cleaning industry, where low profit margins and high customer expectations increase the risk of exploitation.





## Labour Hire Partners

On occasion, Quad relies on subcontractor providers to support business operations, subjecting them to our highest level of supplier due diligence. When engaging a subcontractor, we obtain approval from the relevant client.

Quad collaborates with a limited number of these businesses and maintains an ongoing engagement program for our partner providers. This proactive initiative reviews subcontractor operating practices to ensure compliance with labour rights standards, enhancing industry transparency and integrity. As part of this program, Quad meets with each provider at least once a year, with additional visits if any issues are identified.

## Risks In Our Supply Chain

Quad continues to partner with informed365 to enhance our supply chain assessment and reporting.

All our Tier 1 suppliers are based in Australia or New Zealand, relative to the country of operation.

However, numerous other suppliers contribute to our supply chain by providing goods and services to our direct suppliers. This intricate supply chain spans multiple countries, and we acknowledge the potential risk of labour exploitation globally, with heightened risks in specific geographic and local contexts. The multi-layered global nature of our supply chain means we do not have control or complete visibility.

We are actively engaged with our suppliers to comprehend their approach and, whenever feasible, influence their methodologies to address the risks of modern slavery through our robust processes.





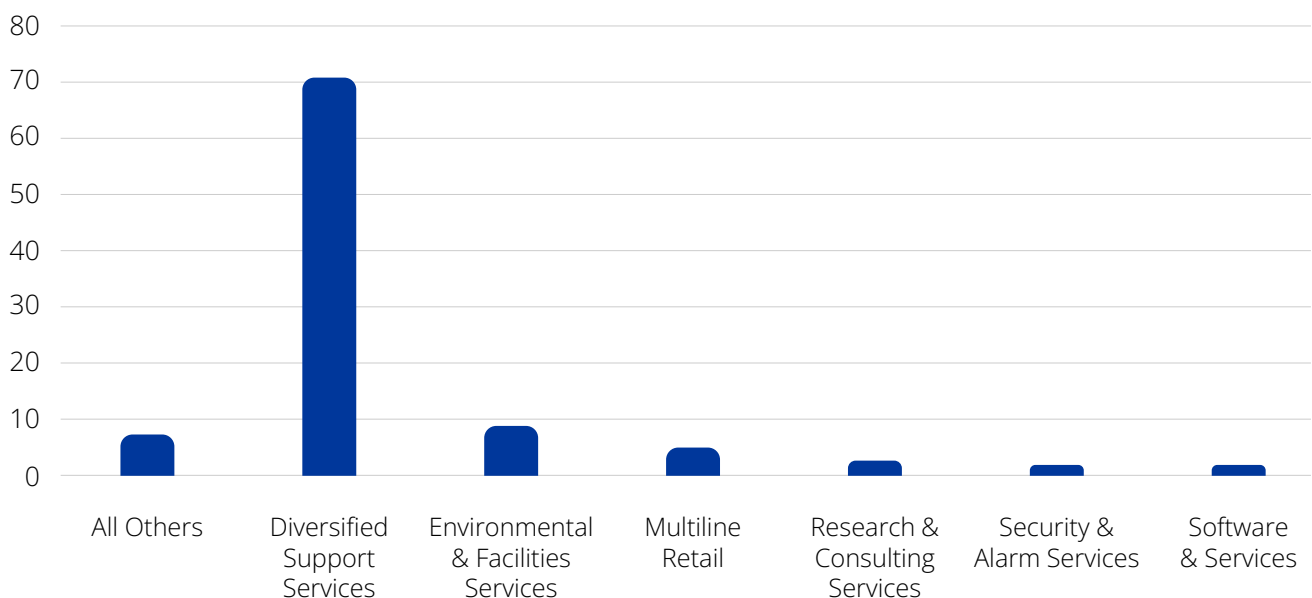
Using informed365, our data gathered from our suppliers shows:

- Our average supplier risk is low
- Our country's risk is very low

The risks in our supply chain include variability in maturity levels and a lack of understanding of the risks of modern slavery among our suppliers.

As such, gaps exist, and we apply these risk factors to our ongoing operations and all our suppliers with whom we maintain a direct relationship.

Our supplier breakup per the Global Industry Classification Standard:



**71%**

of our suppliers are classified as Diversified Support Services

**14%**

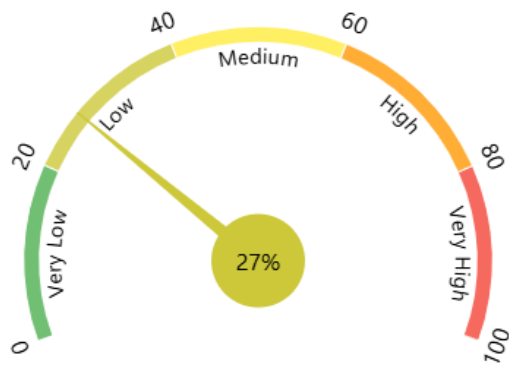
of our suppliers are required to report under the Modern Slavery Act

### All others include:

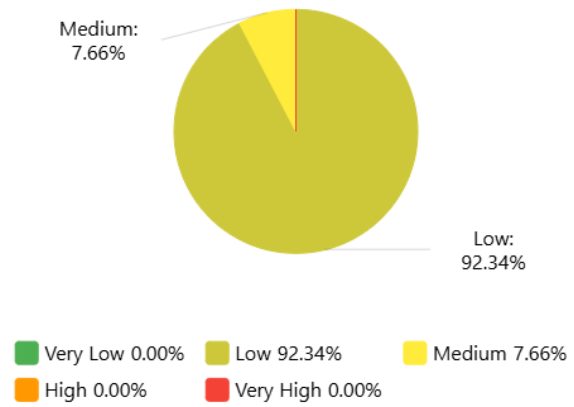
Commercial Printing  
Computer & Electronics Retail  
Consumer Finance Distributors  
Diversified Chemicals  
Electronic Equipment, Instruments &

Components  
Food Distributors  
Food Retail  
General Merchandise Stores  
Health Care Technology  
Household Products

Human Resource & Employment Services  
IT Consulting & Other Services  
Office Services & Supplies  
Oil & Gas Storage & Transportation  
Trucking

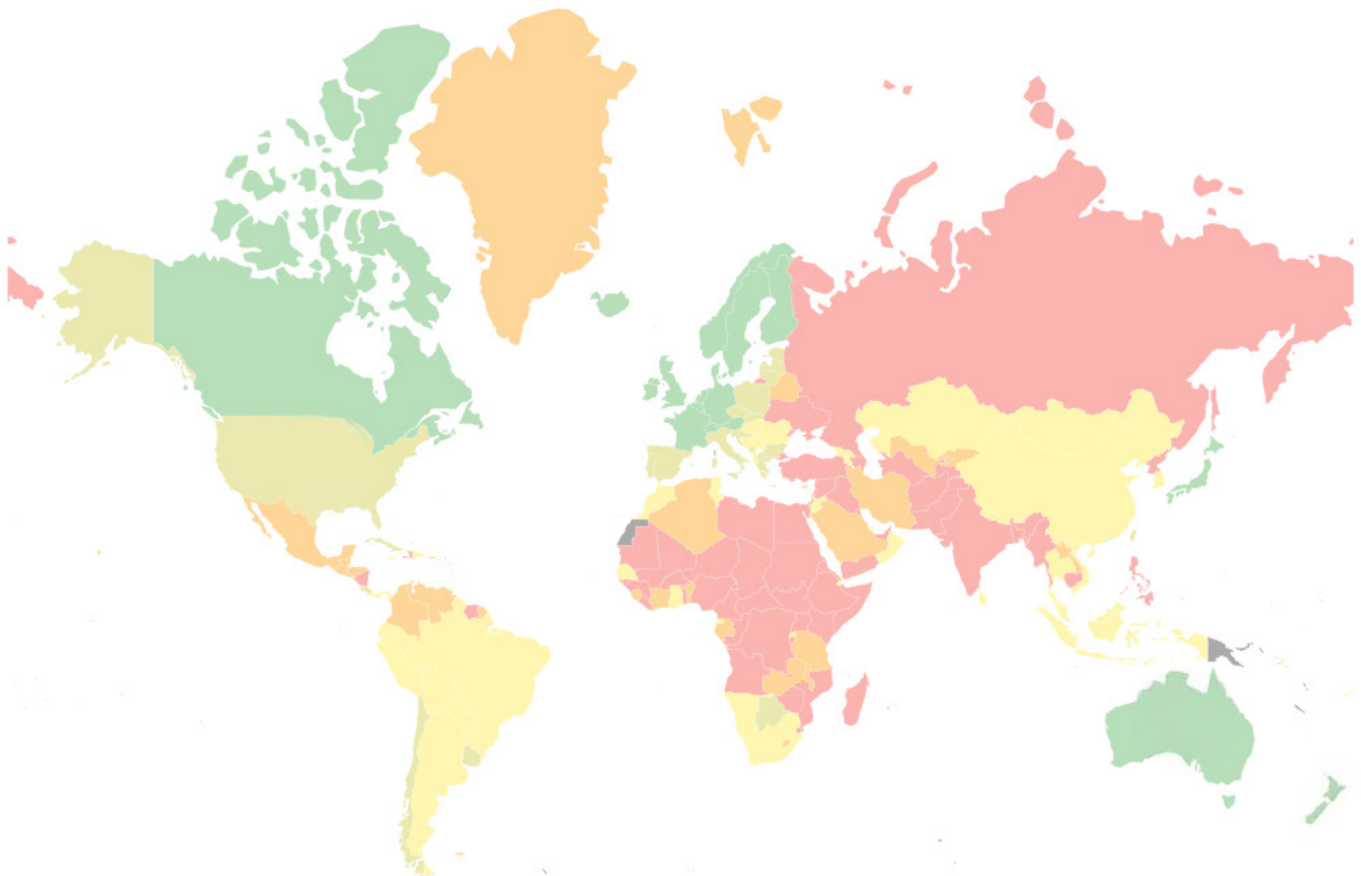


Average Supplier Risk



Supplier Risk

### Geographical Coverage of Supplier Risk





## Key areas of action in 2023-24



### Awareness and Training Initiatives

- Collaborated with subject matter experts and participated in webinars and other educational activities focused on modern slavery.
- Continued our efforts to become pre-qualified with the Cleaning Accountability Framework (CAF), demonstrating our commitment to ethical and responsible business practices.
- Developed and distributed information posters to raise awareness about modern slavery and outline our grievance processes.
- Maintained our membership in the Supply Chain Sustainability School to reinforce our dedication to sustainable practices.
- Increased awareness of the Modern Slavery Act requirements among our personnel and suppliers through regular communications, training sessions for operational teams and leaders, and direct engagement with suppliers to clarify their responsibilities.



### Sustainability and accountability commitments

- Maintained membership in the Supply Chain Sustainability School to reinforce our commitment to sustainable practices.
- Initiated joining the UN Global Compact to demonstrate our dedication to combating modern slavery.
- Continued our efforts to achieve prequalification with the Cleaning Accountability Framework (CAF), showcasing our commitment to ethical and accountable business practices.







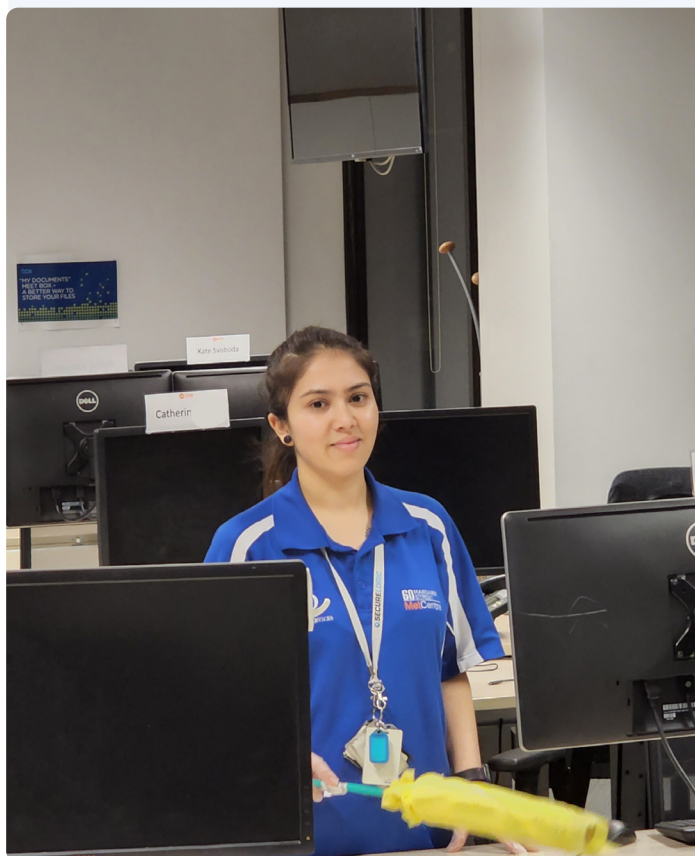
## Policy and Governance Enhancements

- Conducted regular meetings of the Quad Modern Slavery Committee to review and assess our strategies and actions aimed at mitigating the risk of modern slavery.
- Reviewed and revised our human rights policy to ensure it aligns with the United Nations Universal Declaration of Human Rights and the Declaration on the Rights of Indigenous Peoples.
- Additionally, revised our processes and policies to include references to modern slavery and human rights where applicable (and up to date).
- Commenced preparing our submission for EcoVadis which is due to be submitted by October 2024.
- Updated our Modern Slavery risk assessment.



## Supply Chain and Partner Engagement

- Improved our supply chain mapping and supplier onboarding processes by incorporating considerations related to modern slavery.
- Categorised our suppliers according to the Global Industry Classification Standard (GICS)
- Actively participated in client-initiated reviews and assessment projects regarding modern slavery.
- Used the informed365 platform to effectively manage our supply chain and ensure compliance with the Modern Slavery Act.





## Criterion 5

## Assessing The Effectiveness of Our Actions

As in previous years, the risk of modern slavery in our operations remains low, although the cleaning and security industries are recognised as a high-risk environment for instances of modern slavery.

Quad continues to undertake measures to minimise the risk of modern slavery in our operations and supply chain. We strive to maintain active communication with our primary and local suppliers and educate them on modern slavery, even if they are not required to report under the current Modern Slavery Act. Our last statement listed the actions to be completed in FY 2023-24 below.

Action	Status	Comments
Become a member of the UN Global Compact	Not achieved in FY2023-24	While not achieved in 2023-24, it has subsequently been achieved
Continue to embed, measure and report on our modern slavery performance	Somewhat achieved	This is an ongoing process of incremental improvement
Expand our modern slavery assessment and due diligence	Somewhat achieved	More work is required throughout 2024-25
Examine our relationships with not-for-profit organisations that may enhance our remediation policies and procedures.	Somewhat achieved	More work is required throughout 2024-25

In this reporting period for FY2023-24, we have listed our actions and assessed their effectiveness below:



### Consultation

We recognize that the cleaning industry is a high-risk sector susceptible to modern slavery practices. To address this, we engage with our major suppliers and clients to ensure our approach meets their strict requirements. Additionally, we continue to collaborate with informed365 to enhance our capacity for effectively capturing information.



## Policies

We routinely review and update our supplier code of conduct to ensure it complies with relevant legislation. Additionally, we provide training for our employees on these policies and procedures, emphasizing the use of clear and accessible language.



## Contracting

We have added relevant clauses to our supplier agreements and have updated our contractor onboarding documentation to reflect our commitment to addressing modern slavery and comply with related requirements for contractors. We share our updated onboarding information with all new suppliers, and we are also in the process of bringing our existing contracts up to this improved standard.



## Training

We ensure that all our employees receive training on modern slavery awareness, reporting procedures, and remediation steps as part of their induction program. Our leadership team participates in specialized training to understand their responsibilities and learn effective strategies to mitigate the risk of modern slavery. Additionally, our compliance team regularly engages with and trains our suppliers on modern slavery awareness as part of their training programs. Our internal training for leaders is conducted in collaboration with our eLearning partner, Sentrient.

## In summary:

- A Modern Award covers more than 80% of our workforce.
- All our employees receive an employment contract outlining their employment terms and conditions.
- The majority of our workforce (2500+) is based in Australia, with only a small number located in New Zealand.
- We have established a suite of policies and grievance mechanisms that create a foundation for a fair, equitable, and safe work environment. These mechanisms allow employees to raise concerns and issues without fear of retaliation.
- The senior management team and the Modern Slavery Committee provide oversight, including reviewing and monitoring concerns raised through our grievance channels.
- We continue to conduct detailed system audits and participate in customer-led independent audits.
- We do not employ anyone under 18 years of age, and all new hires are provided with Fair Work documentation that informs them of their fundamental rights and entitlements at work.
- Our consistent recruitment process communicates the documents and information candidates must provide during hiring. This may include proof of age, work authorisation, and licensing (for example, security roles). We also have a straightforward method for onboarding new employees and ensuring they are registered in our time and attendance system. Payment is issued only after these steps have been completed.





Criterion

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## Consultation

Quad has established a modern slavery committee to lead and facilitate our efforts in responding to modern slavery. The committee convenes regularly throughout the year. To prepare this joint statement, we engaged with each reporting entity covered by this statement and consulted the entities we own or control.





## Next steps

To consistently improve our approach, we plan to take the following actions in the fiscal year 2024-25:

- Become a member of the UN Global Compact
- Complete Ecovadis assessment
- Complete a third-party social audit against the Social Accountability Standard (SA8000)
- Continue to embed, measure and report on our modern slavery performance
- Leveraging third-party ESG risk management tools to understand our supply chain risk as part of our responsible procurement approach.
- Working with our suppliers to gain transparency beyond Tier 1 of our supply chain.
- Engaging with our customers, industry peers, and non-government organisations to understand best practices and opportunities for collaboration in identifying and addressing modern slavery risk, including through the UNGC.
- Continue to engage with CAF on pre-qualification

## Approval

This statement was approved by the principal governing body of Quad Services Pty Ltd on 12 December 2024.

**Sharee Adlam**  
Executive Director





Quad Services Pty Ltd

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