



2022

# Citywide Modern Slavery Statement

Is that off-the-books purchase you just made keeping **SOMEONE** in **SLAVERY** somewhere in the world?

At Citywide, we're committed to responsibly sourcing the goods and services we use in our business. Read our Modern Slavery statement on the Citywide website and help us stamp out slavery, wherever it occurs.

[W citywide.com.au/corporate-social-responsibility](http://citywide.com.au/corporate-social-responsibility)

**WHAT WE DO MATTERS**

At Gordon McKay, we're committed to responsibly sourcing the goods and services we use in our business. After all, what we do matters.

Read our Modern Slavery statement and help us to stamp out slavery, wherever it occurs.

[citywide.com.au/corporate-social-responsibility](http://citywide.com.au/corporate-social-responsibility)

Is that equipment you're using keeping **SOMEONE** in **SLAVERY** somewhere in the world?

**WHAT WE DO MATTERS**

At Ultegra, we're committed to responsibly sourcing the goods and services we use in our business. After all, what we do matters.

Read our Modern Slavery statement and help us to stamp out slavery, wherever it occurs.

[citywide.com.au/corporate-social-responsibility](http://citywide.com.au/corporate-social-responsibility)

Is that equipment you're using keeping **SOMEONE** in **SLAVERY** somewhere in the world?

**WHAT WE DO MATTERS**

## INTRODUCTION

This Modern Slavery Statement is made by Citywide Service Solutions Pty Ltd, a reporting entity under the Australian *Modern Slavery Act 2018* (Cth), and its subsidiaries (collectively, **Citywide, we or us**) for the year ended 30<sup>th</sup> June 2022 (**FY22**).

The purpose of this Statement is to outline Citywide’s approach to implement systems and improvements to ensure that Citywide has the appropriate policies and processes in place to minimise the risk of modern slavery in our operations and supply chains, as required by the *Act*.

Our modern slavery compliance program and related policies and processes including our Code of Conduct are intended to apply across Citywide. The development of this Statement and the steps outlined involved consultation with key staff, management and executives of Citywide including its subsidiaries.

Citywide acknowledges that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse. It can include the restriction of a person’s freedom of movement by physical or non-physical means.

## OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Established by the City of Melbourne in 1995, Citywide Service Solutions Pty Ltd is a leading industrial services organisation. Together with its subsidiaries, we provide high quality environmental, open space, civil infrastructure, utilities and energy services across Australia’s Eastern Seaboard.



For Citywide, **What we do matters** is more than our tagline – it is our Purpose and our Mission. Citywide is responsible for maintaining many of Australia’s most valued public spaces, iconic boulevards, municipalities and a complete range of electrical services via recent acquisitions.

### Citywide Group snapshot (FY22(FY21))

Revenue	\$350M (300M)
Employees	1,200 (1,200)
Operating sites	30 (28)
Suppliers	2,000 (2,400)
Supplier spend	\$191M (150M)

### Subsidiaries

Citywide Utilities Pty Ltd
Sterling Group Services Pty Ltd
A.W.D. Earthmoving Pty Ltd
Technigro Australia Pty Ltd
Technigro Pty Ltd

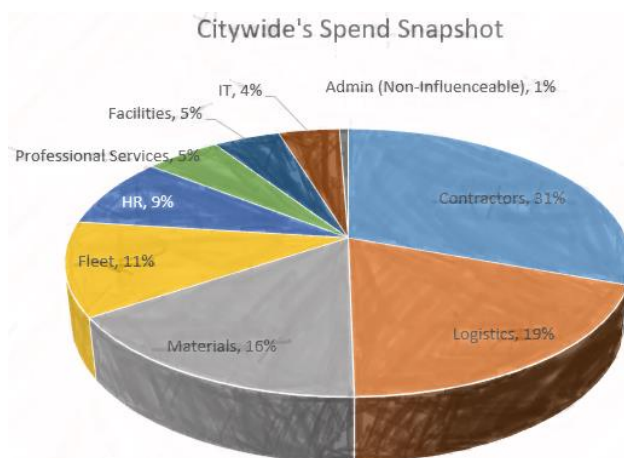
For further detail about Citywide’s business, its brands and subsidiaries, see [www.citywide.com.au](http://www.citywide.com.au)

Citywide has a large and diverse supply chain across goods and services in Australia and globally ranging from local sub-contractors, local distributors of goods to global distributors and manufacturers from China, Japan, India, Europe, Canada and USA. The bulk of overseas-sourced material/equipment is procured through local distributor networks, not directly from the manufacturer. Approximately ninety per cent of our suppliers are from within Australia.

Citywide procures small & large materials and tools to assist in carrying out its services. The items range from hand tools, IT equipment, electrical consumables, wheelie bins, automotive spares, chemicals through to large equipment purchases, including waste trucks, utes, chippers, ride-on mowers, elevated work platforms (EWP), wind turbines and standard alone power systems (SAPS), and leased facilities to house our equipment and employees.

We engage local sub-contractors and labour hire suppliers to support our operational requirements, including plumbers, electricians, concreters and arborists and in various other roles including Information Technology and consultants.

Citywide’s procurement spend snapshot (FY22)



### COVID-19 Supply Chain Impacts

In FY22, disruptions to our supply arrangements due to COVID-19 were realised, including continued delayed lead time in delivery of materials and fleet.

## MODERN SLAVERY RISKS

Over FY22, we have continued to identify the risks in Citywide’s operations and amongst our top tier suppliers that may possibly cause, contribute and/or be directly linked to modern slavery practices. For suppliers, we examined other risk factors such as the sector, industry, types of products and services, high spend suppliers, geographic locations and entity associations.

Citywide recognises that modern slavery risks may be exploited by several industries, product types, commodities, labour practices and geographical locations. Items Citywide procure include apparel (cotton), fleet components, IT hardware and related electronic components & cabling, large equipment and construction materials, which are manufactured from regions where there are concerns around forced labour practices – North Korea, Eritrea, Central African Republic, South Sudan, Pakistan, Republic of India, Cambodia, Iran and the Peoples Republic of China.



Citywide, via a supplier questionnaire, learnt that materials are either directly or indirectly procured through countries with high exposure to slavery practices and others that are less likely.

In addition, we have identified the use of services managed by third party providers, such as contractors, consultancy and labour hire companies, may be a potential risk area if these parties are not in compliance with workplace legislation and standards.

Citywide understands that in Australia and around the world, migrants, particularly female women and children, are at higher risk, of modern slavery and one of our key priorities is to assist people made vulnerable through the process of migration. We recognise the importance of combating slavery and human trafficking; a crime affecting communities, individuals across the globe and here in Australia.

## OUR APPROACH

In accordance with our Group risk standards, the Citywide Group has zero tolerance for any form of slavery-like practices.

### Policies and governance

We have policies in place that promote ethical and legally compliant business conduct. Our policies contribute to our commitment to prevent violations of human rights such as our Code of Conduct, Whistle-blower Policy and associated anonymous hotline as well as our Modern Slavery Policy.

Our Supplier Code of Conduct clearly outlines our minimum requirements for our suppliers. They are expected to share our values and must work to the law and to internationally recognised standards. They must put in place anti-corruption practices and socially responsible supply chain resources. This includes not using any form of child or forced labour and providing fair employment conditions.

Our Procurement team partner with our suppliers to ensure contractual obligations are in place to minimise the risk of modern slavery in our operations and supply chains.

### Assessment and mitigation of risks

Citywide provides fair and safe working conditions for all its employees and ensures no child labour is employed in line with minimum age laws. We expect the same standards from our suppliers, contractors and labour hire providers. We require our labour hire providers to engage workers on fair employment conditions. We have several people and culture policies, procedures and due diligence activities in place which include recruitment and selection, right to work checks, training and development and other workplace management activities.

In conducting due diligence on suppliers, we apply a range of steps including pre-qualification checks, contractual arrangements and ongoing supplier contract reviews. Our supplier pre-qualification forms and contracts include language stipulating that suppliers agree to adhere to our policies, standards and Supplier Code of Conduct. This provides a safeguard that we on board and work with suppliers who agree to operate to the same standard we expect from ourselves.

We developed a simple questionnaire to test initially with Citywide's high spend suppliers and suppliers that may be prone to higher modern slavery risk, this was sent to relevant supplier emails and followed up with phone call reminders, again assisting us to further help segment suppliers better moving forward.

We undertook a supplier risk analysis of Citywide's supplier base, including those of the new subsidiary, Citywide Utilities Pty Ltd, based material types, service, geographical points of manufacture and suspected industries known to engage in modern slavery. Our questionnaire will assist in future segmentation of our suppliers and help manage any vendors deemed to be of high risk.

Our assessment did highlight countries of concern, however our supplier questionnaire gave us confidence that our local incumbent suppliers are undertaking their due diligence with their suppliers in the countries that are considered a higher risk of slavery practices. As we continue to analyse our Tier 1 suppliers we'll monitor their sources of manufacturer, product type, industries and their entity association that may have a high occurrence of slavery.

We upgraded our Procurement systems, which now allows us to better track and monitor our suppliers, particularly those that may be prone to a higher modern slavery risk. As part of the ongoing mapping of Citywide's supply chain, we have endeavoured to identify not only manufacturing locations but also warehousing and distribution locations within Australia and overseas to obtain the transparency required by Citywide as part of good corporate governance. These processes have been undertaken to build an informed Risk Matrix which will identify Citywide's priorities, noting that these may be by geographical location, industry or commodity.

## **Incident reporting and remediation**

We have reporting procedures and mechanisms where employees and third parties can report any concerns, including in relation to modern slavery.

We have established internal grievance resolution processes for our employees to report their concerns. In addition, if they wish to remain anonymous, employees and third parties can report through our independently operated Whistle-blower system via phone or email. We will take appropriate action where issues are investigated and substantiated.

In FY22, we did not receive any reported modern slavery concerns, nor did we identify any instances of modern slavery in our operations or supply chains.

## **Awareness and training**

In FY22, we established a quarterly Modern Slavery Engagement Group (**MSEG**) consisting of Citywide functional and operational leaders to promote awareness of, and to consider, the potential risk of modern slavery practices across Citywide's operations and supply chains.

During FY22, we continued to implement a Modern Slavery Awareness Training program, via our learning management system, for Citywide staff with procurement responsibilities. Citywide's Procurement team continued to attend Modern Slavery training and awareness seminars developed by The Chartered Institute of Procurement & Supply, Informed 365 & The Australian Border Force.

In addition, we have included discussions in our meetings with suppliers centred on Modern Slavery risks and where their organisation is at in their process and development, the number of these meetings has increased as Citywide has developed more mature procurement processes. The meetings also allowed Citywide to improve our data and supplier knowledge about working conditions in places where our goods & services are produced, particularly capital purchases and their ancillary components from overseas regions.

## MEASURING OUR EFFECTIVENESS

At the end of the reporting period and based on our risk identification and assessment activities – supplier questionnaire, risk rating suppliers & compliance to our Supplier Code of Conduct, Citywide has committed to continually evolve its modern slavery compliance program as outlined above. We reviewed the effectiveness of the program through measures including:

- continued modern slavery awareness throughout our organisation via online training programs (an additional 31 employees completed training in FY22 (113 in FY21)), toolbox talks, office posters and supplier assessments.
- systematic review and enhancement of procurement contractual templates, including our modern slavery provisions, particularly with our recent acquisitions.
- continued evaluation of the effectiveness of our policies, procedures and vendor onboarding process to ensure all new vendors sign and adhere to our Supplier Code of Conduct (FY22 166 added (163 in FY21)) in relation to managing modern slavery risk.
- supplier assessments, and how they are conducted integrated with our supplier selection and reported – supplier code of conducts, high risk allocations marked in our Procurement System. In addition to numerous supplier quarterly review discussions included modern slavery concerns and/or incidents in their supply chains
- our communications to further foster modern slavery awareness – newsletters, posters, quarterly MSEG sessions.
- address concerns raised including through our escalating processes, our responses and remediation actions.
- reviewing and assessing the effectiveness of our management-driven training modules for increasing understanding of modern slavery and embedding process changes into our operations; and
- working closely across Citywide operations to gather data about conditions in places where our goods & services are produced via supplier meetings and site visits, re-assessing our supplier risk matrix and reviewing published articles reporting known cases of forced labour being used around the globe.

## LOOKING AHEAD

During FY23, we plan to:

- continue to embed modern slavery considerations, including the broader corporate responsibility strategy, in our policies to further embed a positive culture towards this issue.
- enhance our trial questionnaire and share this with a greater number of suppliers.
- continue to investigate the capabilities of our Procurement System and other data bases to see how they can further assist with tracking and monitoring supplier risks and records.
- enhance our due diligence and supplier monitoring procedures, with a greater focus on suppliers and products being sourced/manufactured from known geographical regions with high concerns relating to forced labour.
- continue to support the compliance of our suppliers through assurance and remediation processes.
- continue with internal stakeholder communications on this issue via toolbox talks, newsletters, posters, including promoting awareness on modern slavery principles; and
- enhance modern slavery awareness training program to include more detailed content.

This Statement has been approved by the Boards of Citywide Service Solutions Pty Ltd and its subsidiaries.

A handwritten signature in black ink, appearing to read "Chris Campbell". The signature is written in a cursive, flowing style.

**Chris Campbell**  
**Chief Executive Officer**  
**Citywide Service Solutions Pty Ltd**