



GJK FACILITY SERVICES
MODERN SLAVERY AND
HUMAN TRAFFICKING
STATEMENT
1 July 2020 - 30 June 2021



FACILITY SERVICES

INTRODUCTION

This is the second Modern Slavery Statement for G.J. & K Cleaning Services Pty Limited (GJK Facility Services) 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 recognize 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

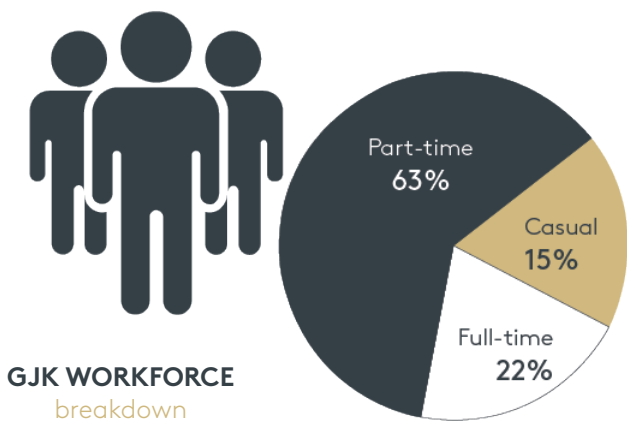
GJK Facility Services started as a small privately-owned commercial cleaning company in 1985.

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 2140 employees across Australia and New Zealand.

GJK Facility Services also controls GJK Facility Services NZ Limited with 100% ownership, controls GJK Window Cleaning Services with 75% ownership and owns 49% shareholding of Netronix Pty Ltd. All three noted businesses fall below the threshold requirements to provide a modern slavery statement and as such are not reporting entities.



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 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.</p> <p>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 GJK Indigenous Solutions 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 	<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

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

OUR APPROACH

GJK Facility Services Risk Committee was established in 2019 to manage the operational and business risk.

During the reporting period, the structure of the Risk Committee's changed and now consists of the Chief Executive Officer, Chief Financial Officer (Chair), and Chief Operating Officer who meet quarterly to review the company's Business Risk Matrix of which modern slavery is a component. In addition to the Risk Committee, the business created a new position, the National Manager, Risk, Governance, and Internal Audits. This role is responsible for overseeing the company's compliance to legislation and regulatory requirements, including Modern Slavery.

It is their responsibility to ensure the company is adhering to legislative and regulatory requirements and review business risks across our operations and supply chain, determining if the processes and systems are working or if further actions are required.

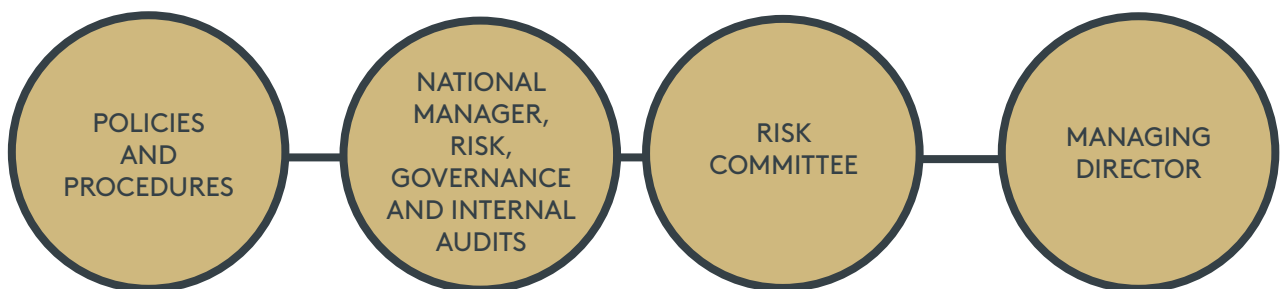
They are also responsible for reviewing and identifying any potential new risks, the potential impact on the business, and actions required to mitigate these risks reporting them to the Risk Committee. Together, the Risk Committee and the National Manager, Risk, Governance, and Internal Audits monitor our service partners, suppliers, and our business practices to ensure there are no forms of slavery-like practices occurring.

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 work on our processes and practices by reviewing and updating our procurement practices to reduce the risk of identified modern slavery risks to the business.



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 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		

One of these improvements was the implementation of an on-line pre-qualification assessment tool for our suppliers. This tool asks a range of compliance questions, including several relating to Labour Rights and Modern Slavery, enabling the business to assess the strength of a company's policies, procedures, and processes before engaging with them.

Since implementation, the business engaged with all our existing service partners, explaining the new process, including the Modern Slavery component, why, and its importance before putting them through the process, working with them if they required assistance.

In addition to including Modern Slavery/Human Rights questions during our pre-qualification supplier assessment process, we also reviewed and updated our Service Partner Induction process, capturing the business stances on expectations around modern slavery and human rights. The inclusion of a section within our Service Partner Induction Guidelines document based around the Ten Principles of the United Nations Global Compact which were derived from the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention Against Corruption. These clearly outline the businesses expectations of companies that work with us around the areas of:

- **Terms** – where workers have clear written employment terms before deployment in a language they understand and in line with terms of recruitment
- **Legal status** – where workers are legally authorised to work for their employer, possessing the required visa, work permits, and any other required legal documentation
- **Protection of young people** – where workers below minimum working age are not hired directly or indirectly
- **Pay** – where workers are paid on time, per employment terms. Wages, benefits, and overtime rates are met as a minimum along with national legal standards. Wages paid and hours worked are to be accurately recorded in a time-keeping system, including reporting on superannuation and taxation.
- **Work, time, and rest** – where workers are not required to work unreasonable hours, hours beyond legal limits or without appropriate breaks, and defined leave periods.
- **Grievances** – where a grievances process is in place for workers to make complaints and receive appropriate responses and timely updates. Where they aren't afraid of retaliation, discrimination, or harassment for raising any concern.
- **Working conditions** – where workers enjoy a safe and hygienic working environment, with access to amenities.
- **Discrimination and harassment** – where there is no discrimination in employment practices.
- **Controls** – where adequate processes and controls are implemented, communicated, monitored, and remediated to ensure safe work practices
- **Environment** – where safe operating procedures or safe work method statements should identify any risks to the environment, appropriate actions are deployed to mitigate that risk.

Internal and external audits of our service partners against the Fair Work Act 2009 (Cth) and Fair Work Regulations 2019 (Cth) to ensure various health and safety, working hours, and wage requirements within same were abided by, however, the frequency of the audits was disrupted by COVID lockdowns and restrictions and we didn't achieve all planned audits.

GJK Facility Services understands that modern slavery is serious exploitation, rather than substandard working conditions or underpayment of workers, but we also know that the two can coexist (and are often related) and believe that monitoring working conditions and pay can assist in identifying and addressing modern slavery risks.

POTENTIAL RISK TO OUR OPERATIONS AND SUPPLY CHAIN

In our Statement last year, GJK Facility Services identified that cleaning is a recognized high-risk sector and service, that is often associated with lower wages and manual labour, breaches of workplace laws, health and safety issues, and more serious forms of exploitation such as modern slavery. This, plus the fact that GJK Facility Services outsources a percentage of services to third-party contractors where we have reduced visibility and oversight of their practices, our business has the risk of potentially being linked and contributing to modern slavery.

With the introduction of the new pre-qualification supplier assessment process and ongoing third-party audits, we are trying to mitigate these risks.

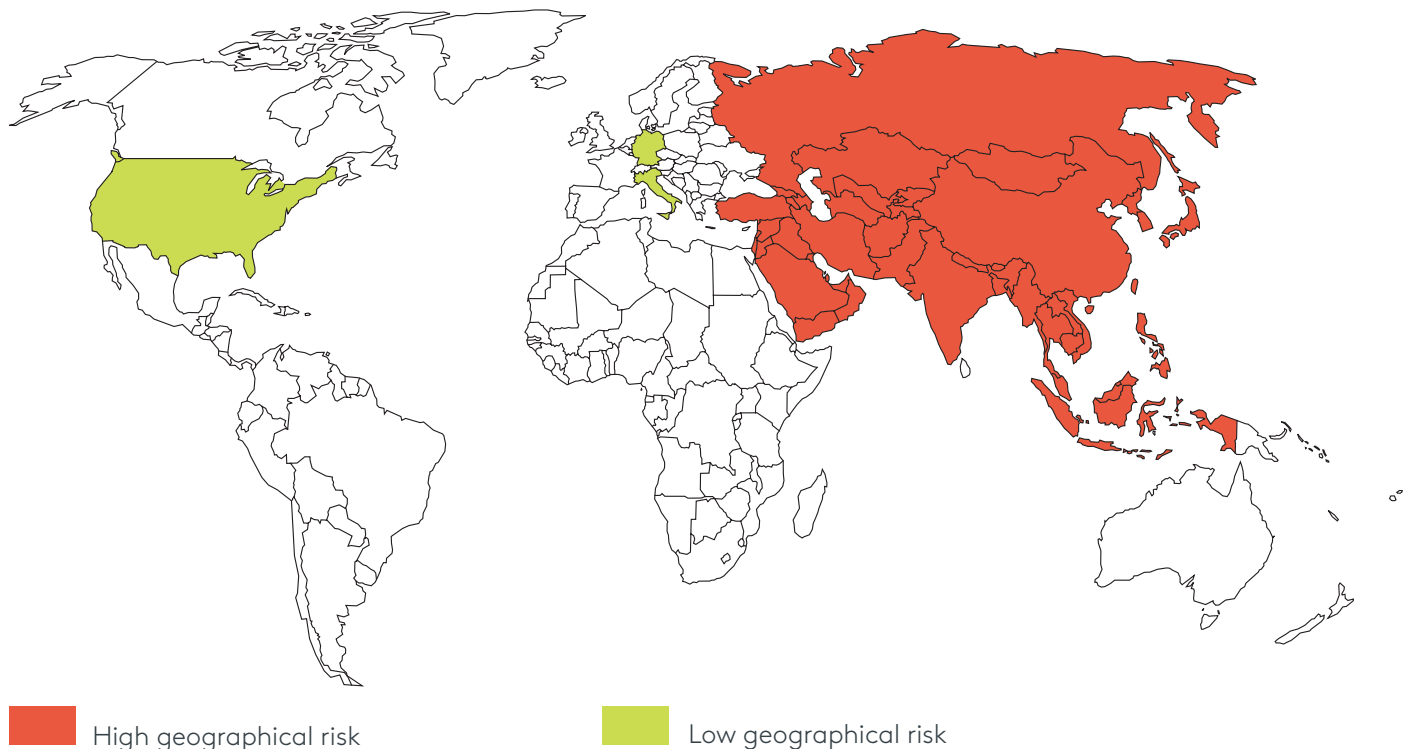
The supplier scoping exercise we planned to undertake was interrupted by COVID lockdowns and restrictions. However, due to the nature of our business, the company felt it was pertinent to undertake a detailed scoping exercise of our main supplier of cleaning products/consumables to identify any potential risks to modern slavery that may have arisen due to the global sourcing demand of COVID products and supplies.

We identified that our Australian cleaning supplier was sourcing supplies from China, Italy, Germany, Asia, and the USA. With both China and Asia identified as high-risk geographical locations for modern slavery and human trafficking, there is a potential risk of the company being linked and contributing to modern slavery.

In our last Statement, we identified that our uniforms were made in China, an identified high-risk geographical location, and being in the textile industry is similarly linked to high risks of child labour, forced labor, and other forms of slavery. Unfortunately, we haven't ascertained the location/province in China where our uniforms are manufactured, so this remains a potential risk of the company being linked and contributing to modern slavery.

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

ORIGIN OF CLEANING SUPPLIES



POTENTIAL RISK TO OUR OPERATIONS AND SUPPLY CHAIN

Another identified risk to our operations and supply chain is our use of third-party contractors to deliver our services. To reduce the potential risk of being linked to modern slavery risks due to reduced visibility and oversight of our service partners' practices, in 2019 we started implementing a plan to reduce the outsourcing of labour and increase our direct labour force. We have continued these activities, with over 20% of our workforce (400 workers) becoming direct employees of GJK Facility Services during this reporting period.

The business identified several new risks with the potential to increase modern slavery risks for workers within our supply chain due to COVID, particularly our service partners. These risks pertained to protecting their workers from COVID by:

- providing them the correct personal protective equipment,
- providing sick or carers leave,
- ensuring affected workers were provided correct leave and pay arrangements during periods of isolation and additional support if required, and
- redeploying workers to mitigate the impact of workforce reductions due to customer site closures.

To mitigate these risks, we maintained strong relationships and open communication channels with our service partners, working with them to try and redeploy their workers where possible and providing support such as:

- Providing our service partner workers with the appropriate personal protective equipment when required.
- 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 and had a support network whilst unwell and in isolation.
- Ensuring our service partners were adhering to correct leave and pay provisions through open communications with them and verifying during external audit.

We will continue to scope the various risks present within our supply chains and operations and implement the necessary actions to mitigate any identified risks.

ADDRESSING THE RISKS OF MODERN SLAVERY PRACTICES

The severity of lockdowns and restrictions imposed by COVID during this reporting period has impacted our ability to implement certain planned activities. With this said, we were unable to carry out activities the business felt were best-conducted face to face. These included; the planned internal and external audits, modern slavery training of our employees, and some of the collaboration activities we had planned with our associated entities to identify and better understand potential modern slavery risks. Additionally, due to increased COVID activities within our business and our focus on the health and wellbeing of our employees, during this trying time, the company decided to postpone the supplier scoping exercise. All activities will resume within the next reporting period.

During this reporting period, the company did undertake and implement several actions in our risk mitigation plan highlighted in the following actions table.

Two key actions to mitigate our business risk of non-compliance to labor standards in the supply chain, including health and safety, working hours, wages, forced labor, child labour, and freedom of association, was the implementation of modern slavery/ human rights components into our processes and practices. The implementation of the revised procurement process now has a robust pre-qualification supplier assessment process to help identify potential modern slavery risks and other compliance issues before engagement. The revised Service Partner Induction sets clear expectations our company has of suppliers concerning Modern Slavery through the Service Partner and Supplier Code of Conduct and additional modern slavery information in the Service Partner Induction Guide. The implementation of this and the ongoing audits of our service partners will help the business keep abreast of potential modern slavery risks.

Our monitoring and assessment framework has identified further improvements to our procurement process. Consulting with our pre-qualification assessment supplier, we've learned they have developed a Modern Slavery Assessment tool that will classify suppliers by risk level based on how they and their suppliers are managing modern slavery practices. The implementation of this additional feature will occur in the next reporting period as outlined in below action plan and will be used for our full supply chain.

We will continue to reduce the outsourcing of labor by increasing our direct labor force. This will reduce the potential modern slavery risks due to not having clear visibility or oversight of our service partners' business practices. The company will continue this transition with the plan to get the percentage of outsourcing to direct to 70/30 – 70% direct to 30% outsourcing.

We acknowledge we have work remaining and are on a journey to better understand and manage the risks of modern slavery within our supply chain. However, we feel we have made steps forward during this reporting period and will continue to assess modern slavery risks within our operations and supply chain and address our actions.

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"> ● Modern Slavery / Human Right questions to be incorporated into Pre-Qualification Assessment Questionnaire - completed ● Regular internal / external audits of Service Partners and Suppliers to mitigate the risks of unethical practices in our supply chain - 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"> ● Review and update Procurement processes to reduce risk of identified modern slavery risks to the business - completed ● Develop and implement Service Partner and Supplier Code of Conduct - underway - completed ● Review and update existing Service Partner Induction process to capture the businesses stance and expectations around modern slavery and human rights - completed ● Implement new Modern Slavery Assessment module into iPro (companies supplier assessment system) - new

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 • Provide training on updated internal Procurement processes - 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
<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 • 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 22 December 2021.



George Stamas
Founder and Managing Director