consolidated



Beyond Clean. Beyond Green.

Professional Cleaning Services

Creating healthy & safe environments in office, retail, and education since 1977.





Beyond Expectations

Consolidated's point of difference



Our team is as diverse as our nation, with all religions, cultures, genders and communities eagerly embraced and warmly celebrated.



We value respect. How we treat our team is reflected in how we treat our clients. Because we know strong, respectful relationships create the best outcome.



Our team members are highly regarded for their focus, courtesy and commitment to customer service. It is in our DNA



We directly employ all our +3000 staff on Award wages, ensuring fairness, continuity and stability. We are committed to active compliance and support of the Modern Slavery Act & CAF.



Our company is as strong as our people. We reward hard work and celebrate the milestones.



Through our induction and specialised training programs, our teams are educated, well-informed and very safety conscious.

And, always highly motivated.

Consolidated Team Building 2022

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Modern Slavery Statement 2023

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ACKNOLWEDGEMENT OF COUNTRY

Consolidated Property Services acknowledges the Traditional Owners of Country throughout Australia and the continuing connection to lands, waters and communities.

We pay our respects to Aboriginal and Torres Strait Islanders' cultures and Elders past and present.



Artwork by Gary Saunders, a proud Bangerang, Wiradjuri, Yorta and Dja Wurrung man, born in Shepparton and raised in Mooroopna in the Goulburn Valley area.



Message from COO

At Consolidated Property Services Pty Ltd (Consolidated) we understand that the nature of our business means we are exposed to potential modern slavery risks across our operations and supply chain and we are committed to taking action and responding to this problem. Cleaning has been identified as a high risk category in regards to modern slavery due to the material risks associated with various forms of indirect employment: labour hire; contracting and subcontracting.

At Consolidated, we are proud of the fact that 100% of our cleaning staff are directly employed, and we do not partake in the various forms of indirect labour, giving us greater control and oversight of modern slavery risks in our business. Within our direct business operations, the risk of modern slavery may be low. However, the exposure of our business to the possibility of modern slavery (directly or indirectly) is still present through our supply chain.

We believe that it is the professional and moral duty of every person at Consolidated to report any suspicions they have of modern slavery in our supply chain.

Consolidated believes that by incorporating the Ten Principles of the UN Global Compact into strategies, policies and procedures, and establishing a culture of integrity, Consolidated are not only upholding the basic responsibilities to people and planet, but also setting the stage for long-term success.

As part of Consolidated's contribution to discussions surrounding the improvement for our cleaning staff, we continue to promote CAF amongst building management, building owners and unions ensuring that we are across this framework to better integrate this across the industry. Consolidated fully supports the CAF principles as they are aligned with our values. It highlights the importance of responsible contracting practices.

Arthur Mallios Chief Operating Officer



Our Modern Slavery Statement

This is our third Modern Slavery Statement produced in accordance with the reporting requirements under the Modern Slavery Act 2018 (Cth), which was approved by the Board on 20th September 2023.

This Statement reflects work undertaken by Consolidated to address modern slavery risks in our supply chains and operations during the 2022-23 Australian financial year (Reporting period).

Any feedback or queries relating to our Modern Slavery Statement can be sent to:

Consolidated Property Services (Aust) Pty Ltd (ACN: 006 727 484) Level 33/55 Collins St, Melbourne. VIC 3000 T: 03 8633 8200 E: info@consolidated.com.au

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Modern Slavery Act 2018 Mandatory Reporting Criteria

The table below explains how this Statement meets the mandatory reporting criteria set out in the Modern Slavery Act 2018 (Cth).

Mandatory Criteria	Page Reference in
	the Statement
Criteria 1 - Identify the reporting entity	Page 9
Criteria 2 - Describe the entity's structure,	Pages 10- 15
operations and supply chains	
Criteria 3 - Describe the risks of modern slavery in	Pages 16 -18
the operations and supply chains of the reporting	
entity and entities it owns or controls	
Criteria 4 - Describe actions taken by the entity	Pages 19 -28
and entities it owns or controls to assess and	
address the risks (this includes due diligence and	
re- mediation)	
Criteria 5 - Describe how the reporting entity	Pages 29-31
assesses the effectiveness of the actions	
Criteria 6 - Describe the process of consultation	Consolidated Property
with entities that the reporting entity owns or	Services does not own
controls	or control any other
	entities.
Criteria 7 – Provide any other relevant information	N/A



Our Collaborative Partnerships

Consolidated Property Services (Aust) Pty Ltd have worked with these industry groups to enhance our understanding of modern slavery risks and actions.

We acknowledge the contribution of these partners during the reporting period and are referenced throughout this statement.















Reporting Entity

Mandatory Criteria 1 & 2

This section addresses mandatory criteria 1 and 2 of the Modern Slavery Act 2018, pursuant to sections 16(1)(a) and (b). This section provides an outline of the Company's structure, operations and supply chains during the reporting period.

Organisation Structure





Our Business

Founded in Melbourne in 1977 by founders John and Mary Grant, Consolidated has grown from strength to strength to become one of the nation's leading commercial cleaning companies, with a reputation for servicing premium corporate offices, retail precincts and education facilities. Consolidated does not own or control any other entities.

Consolidated directly employs over 3000 staff, servicing more than 350 contracts throughout Australia, proving our strong relationship with Industry stakeholders. We lead an experienced and dedicated team of cleaners with multilayered support from Managers, Supervisors and specialised department teams.

Our strength is our people, and we heavily invest in the training, development, recognition and rewards programs for staff at all levels of the business. A key to building a strong cleaning team Is embedding our safety-first culture through our Be Safe program which Is the foundation for all learning.

For over 45 years, we have been committed to commercial cleaning services, improving the management of waste and recycling, playing our part in reducing landfill and finding better ways to achieve more sustainable practices in the properties we service. Bringing our knowledge and experience provides practical ways to achieve our clients' own environmental goals.

The company mission can be summed up quite simply 'Beyond clean. Beyond green'.

We directly employ our 3000+ team Of cleaners

Over 3.5 million m2 premium assets cleaned daily 350+ cleaning Contracts throughout Australia

Beyond Clean. Beyond Green.





Consolidated Four Pillars



At the centre of Consolidated structure and operations are our Strategic Pillars. It is the objective of Consolidated to:

- Deliver leading **Customer Experience** by acting as a trusted partner and providing service delivery excellence together with innovative technology and environmental solutions.
- Deliver a leading **People Experience** by fostering a safe and supportive working environment that offers career opportunities, two-way communications, strong relationships and projects that prioritise human rights.
- **Do The Right Thing** across all functions of the business by ensuring that decisions consider the long-term impact on our staff, our customers, our communities and the planet.
- Invest and develop in transformational projects that ensure that Consolidated is **Fit for Growth**



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Our Operations

Consolidated Property Services offers the following suite of services;

- Commercial Cleaning Services
- Waste / Recycling Management
- Environmental Consulting & Solutions
- Sanitary & Hygiene Services
- Pest Control Services
- Electrical Test & Tag Services
- Kitchen & Toilet Consumable supplies
- End of Trip Cleaning
- Floor Treatments & Maintenance

- Window & High Glass Cleaning
- Emergency Response Cleaning
- Specialist Cleaning & Periodicals
- Integrated Facilities Solutions
- Pressure Washing
- Laundry, Towel & Linen Services
- Escalator Cleaning
- Carpet Steam Cleaning



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Our Income and Procurement

Annual Revenue - FY 23

\$190 million

FY 23 Revenue

Breakdown by Sector

Commercial	73.06%
Education	2.52%
Retail	24.42%



- Commercial
- Education
- Retail

Breakdown by Service

Commercial	94.75%	
Cleaning		
Rechargeables	2.46%	
Waste	2.80%	



Breakdown by Spend

Chemicals & Equipment	49%
Waste	16%
Rechargeables	15%
Specialist Contractors	12%
Consultants	3%
IT/Communications	5%



- Rechargeables
- Specialist Contractors

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Our Supply Chain

Suppliers - Products	Product Type	Source Country	
Cleaning Supplies	Cleaning Chemicals; Cleaning Cloths; Trolleys;	Australia, USA, Canada, China	
	Bins; Mops; Buckets; etc		
Personal Protective Equipment	Disposable Gloves; Face masks; Eye Protection; Safety Boots; Reusable	Australia, China, Malaysia	
	Gloves; Coveralls; Hi-	Malaysia	
	Visibility vests; Hats; Hand Sanitiser		
Uniforms	Shirts; Pants; Name badges; Jumpers; Jackets	Australia, China	
Plant & Equipment	Vacuum Cleaners; Floor Scrubbing	Australia, Italy, USA	The second
	Machines; Car Bark Swaapars: Pobatios: Matariaad	UK, China,	
	Park Sweepers; Robotics; Motorised Trolleys	Germany, Holland	
Consumables	Toilet Paper; Tissues; Hand Towels;	Australia, New	
	Soap	Zealand, Indonesia, Malaysia China	
		,	Califier X
IT / Communication Devices	Computers; Laptops; Tablets; Telephones; Head-	China, USA	Alt an
	sets; 2-way radios		A A
Office Supplies	Stationery; Catering; Groceries;	Australia, China	India Water
	Promotional Mate- rial		
Vehicles	Utility vehicles; electric vehicles; ATV's	USA, Japan	



Our Supply Chain (Continued)



Suppliers - Services	Service Type All service providers are Australian
High Window Cleaning	Specialist window cleaners performing all window cleaning works above 2 metres
Sanitary / Sharps	Biohazard waste removal
Linen / Laundry Services	Laundry services for towels and linen
Waste Collection Services	Specialist waste collection services including (but not limited to): General waste; Comingle; Recyclables; Organics; E-waste
IT	3 rd party IT service provider
Telecommunications	Communications networks (Optus / Telstra)
Equipment Maintenance	3 rd party arrangements for the provision of onsite machine maintenance and repairs
Electrical Test and Tag	Electrical testing and tagging of all electrical equipment by 3 rd party specialist



Our Risks

Mandatory Criterion 3

This section addresses mandatory criterion 3 of the Modern Slavery Act 2018, pursuant to sections 16(1)(c). This section describes the modern slavery risks in our operations and supply chains which were a priority during the reporting period.

Recognising the Risks

Labour exploitation in the cleaning industry is well-documented, and cleaning services have been identified by the Government as a key risk area for modern slavery in Australia.

Key drivers of non-compliance in the cleaning industry include:

- Complex subcontracting arrangements;
- Low barriers to entry for contract service providers;
- A largely migrant workforce, often with precarious visa conditions; and
- 'Aggressive price competition'.

Operational Risk

With our awareness of the risks in the cleaning Industry, Consolidated assesses the residual risk of modern slavery in our operations as low. We have a multi-layered management and site supervisor network, that monitor, assist and support our cleaning team and cleaning practices.

At Consolidated our cleaning sites are In Australia, our cleaning team live and work here. Our company Is made up of people from many nationalities, some visa holders but everyone working for Consolidated are entitled to Australian work rights. Our employees have the benefit of robust corporate policies and procedures which include the requirements for compliance with applicable laws and regulations in addition to their contractual entitlements, all of which are designed to ensure that all staff are remunerated fairly and in accordance with any applicable industrial instrument and/or employment laws, and the individual is working of their own free will.



Sustainable Development Goals

We are aligned to several of the United Nations Sustainable Development Goals. creating a positive impact on society.



Transforming our World: the 2030 Agenda for Sustainable Development

By reducing inequality, providing decent work and economic growth, Consolidated is implementing controls to mitigate the risk of modern slavery in its operations.

Consolidated supports the Property Council of Australia's lead in addressing modern slavery risks across the property sector by directly hiring all of our cleaning staff to perform our core cleaning work. We align ourselves with ethical partners such as the UN Global Compact and Ecovadis positioning our policies, procedures and targets. This alignment assists in strengthening our culture of professionalism and integrity with long term sustainable growth and success.



Supply Chain Risk

Our tier I supply chain consists of local suppliers who source their materials and products from many countries worldwide, with the majority of Tier 2 suppliers located in UK, USA, parts of Europe and China. We maintain a great working relationship with each of our Tier I suppliers, and we continually work closely with them to ensure the environments in which our products are sourced are safe, fair, sustainable, and responsible.

In addition to our supplier agreements, we manage all our Suppliers though our Cm3 supplier portal and utilise the 'Ethical Sourcing Questionnaire' and customised surveys via our online supplier platform for further due diligence on our supply chain to identify any modern slavery risks.





Our Actions

Mandatory Criterion 4

This section addresses mandatory criterion 4 of the Modern Slavery Act 2018, pursuant to sections 16(1)(d). Due diligence under The UN Guiding Principles 15 and 17.

This section provides an outline of the steps taken to assess and address modern slavery risks in our operations and supply chains during the reporting period. How we identify, prevent, mitigate and account for addressing modern slavery risks.

During the reporting period, we focused our activities shaped by our assessment and prioritisation of our modern slavery risks. These activities were targeted at building our understanding and capabilities, improving our policies and processes and enhancing engagement with our supply chain.

Assess and Address Modern Slavery Risk

Ongoing Assessment of Risk

Monitoring modern slavery risk involves ongoing assessment of risk within our organisation and supply chain. Consolidated conducts an annual assessment of risk as mandated by the Modern Slavery Act 2018 (Cth).

Monitoring risk is conducted on an ongoing basis through:

- Quarterly risk reports
- Periodic assessment of suppliers and Internal audit of supplier screening process
- Monitoring and responding to grievance reports
- Staying up to date with relevant news, regulatory changes, and industry reports
- Communicating regularly with suppliers



Five effective ways of managing modern slavery risk are:

- Building strong relationships with our suppliers
- Reducing exposure to risk by assessing suppliers prior to engagement
- Incorporating modern slavery risk into our standard risk management practices and reporting standards
- Engaging third party organisations to assess the modern slavery risks within our organisation.
- Adhering to relevant awards, legislative compliance and licencing

By monitoring modern slavery risk, we can take immediate and effective measures against modern slavery practices, in our business or value chain. So far, no cases of modern slavery have been found.



COMPLIANCE & CERTIFICATIONS



Embedded in our steps taken to assess and address modern slavery risks in our operations and supply chains, are:

- Publishing our Modern Slavery Statement
- Retaining international standards of certification against quality, health, safety and environmental practices
- CAF prequalification and undertaking CAF audits.
- Adherence to relevant awards, legislative compliance and licencing.





New Risk Management Approach and Oversight Function

In the reporting period, Consolidated strengthened its '3 Lines of Defence' model for managing risk.

Ist Line: All employees are at the frontline and are responsible for managing and defending against risk in line with the policies, approach, culture and ethics of Consolidated.

2nd Line: Staff responsible for developing and maintaining processes, procedures, training and infrastructure.

3rd Line: Internal and external audit function

To help oversee our enhanced risk management strategy, our independent Risk & Compliance team continues to grow. The team no longer sits within our People and Culture Team. Instead they are an independent team that report into a Company Director.

Our Risk and Compliance Team spend a significant amount of time visiting sites and working with operations to better understand the reality of the work that is being undertaken and the risks and challenges our teams face. Being onsite also enables us to foster an open, transparent culture where risks are discussed and mitigated."

Clea Vazquez Head of Risk & Compliance



25 % increase in onsite visits (audits and risk assessments)

30 % reduction in 'open' operational risks

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Building our Understanding and Capabilities

Working Group

The Consolidated Environmental Social & Governance Committee continues to ensure compliance with our reporting requirements under the Modern Slavery Act. This group includes representatives of Consolidated's Risk, Procurement, Sustainability and People & Culture business units. During the reporting period, key members of our committee attended seminars and networking groups (including the United Nations Global Compact) to share knowledge, learnings and best practice in relation to modern slavery.

Ethical Group Training

During the reporting period we released a suite of modules designed to raise awareness about modern slavery and unethical behaviour, provide guidance on how to recognise and respond to modern slavery, bribery, corruption, sexual harassment and site safety. These learning modules were deployed to employees across our business to support ethical behaviour, equality, health, safety and inclusivity.

Employee Grievance Procedure

During the reporting period we reviewed our Employee Induction and Training procedure, Issue Resolution Procedure and Whistleblower Protection Procedure. Consolidated ensured they align with current process, that is ethical, transparent and people focused, providing best practice training to our team for work skills preparation but also for expected process, if there is a grievance or reason to report.





Safe & Supportive Working Environment

Consolidated believes that social responsibility is a key aspect of ESG, and we strive to make a positive impact on our staff, our clients and the communities we operate. Within the Cleaning Industry there have been companies that have behaved unethically and provided poor working conditions for their staff. At Consolidated we prioritise fostering a safe, compliant, and understanding working environment by directly employing approximately 3,000 core cleaning staff and only engaging sub-contractors for specialist activities, outside our core cleaning schedules. By focusing on social responsibility and impact we aim to reduce modern slavery risks in our operations and supply chains.







Improving our Policies and Processes

Prioritising Human Rights

Consolidated believes in devising enduring policies to uphold human rights and compliance. Consolidated has developed a wide range of policies and procedures to ensure safe and fair working conditions for our staff and subcontractors.

Key Policies and Documents include:

- Modern Slavery Policy
- Work Health & Safety Policy
- Employee Handbook
- BeSafe Handbook
- Business Integrity Policy
- Anti-Bribery & Corruption Policy
- Whistleblower Policy
- Staff Training & Development Policy

Socially Responsible Projects

During this reporting period, Consolidated delivered key social projects and internal governance, strengthening our ongoing commitment to our people through:

- Improving our Staff Engagement Program (300+) recognition awards by including a new award for Risk and Safety awareness (Risk & Safety Ambassador Award)
- Expanding our Risk & Compliance Team increasing health and safety awareness and advice
- Embedding ongoing Workplace Safety Topics that are reflective of information from previous month reported data
- Completing Monthly Risk Working Group
- Over 10% of our sites were subject to third party social audits

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Consolidated engaged third party consultants such as Cundall and Nexio, to assist in further developing our social responsibility projects, our ESG strategy, roadmap and report. Part of our company's core operations, focuses on promoting social equity, reducing waste and pollution and implementing sustainable practices.

KPIs

By engaging third party consultants such as Cundall and Nexio, in the reporting period, Consolidated mapped our targets into KPIs, embedded in our policies. These KPIs support our ESG targets and reflect achievable improvements aligning with SDG goals.

Supplier Due Diligence

In the reporting period, Consolidated completed our annual supply chain modern slavery risk assessment, referenced against the Global Slavery Index 2023.

All suppliers are required to complete our annual Modern Slavery questionnaire as well as agree to the Consolidated Modern Slavery Policy and Code of Conduct for suppliers which is devised in accordance with the Universal Declaration of Human Rights (UDHR).



Third Party Assessment of Fair & Compliant Working Conditions - Cleaning Accountability Framework (CAF)

Third party organisations such as Cleaning Accountability Framework (CAF) play a significant role in ensuring our industry provides safe, compliant working conditions for its staff. Consolidated endorse the CAF principles as their values aligned with our values, highlighting the importance of responsible contracting practices. Consolidated is one of only a handful of cleaning companies nationally who has worked with our clients to assist them in attaining the CAF 3 star certification for their assets. At CAF certified sites we work with stakeholders to complete an Annual Review where corrective actions are raised and mitigants are agreed and tracked until compliant to CAF 3 standard.

The Cleaning Accountability Framework is one of the few worker-driven due diligence schemes. It offers Consolidated the ability to have our organisation and the sites we service, reviewed and certified by a third party. Unlike a standard social audit, a CAF audit undertakes more meaningful worker engagement (including staff meetings, staff surveys etc) to assess working conditions.

Consolidated undergoes annual CAF review and is one of a few cleaning companies that has achieved CAF prequalification status.





CAF Contractor Prequalification renewal

Contractor Prequalification is an assessment of a cleaning contractor's HR systems, policies and procedures against the CAF 3 Star Standard. Consolidated first acquired CAF 3 Star Prequalification in 2019 and it has successfully renewed each year.

A cleaning contractor that is CAF Prequalified can signal to existing and potential clients that the company has:



- adequate management systems in place to provide correct wages and conditions and superannuation, including appropriate record keeping systems;
- processes to educate cleaners about their workplace rights and conditions of employment;
- policies, procedures and systems in place to provide cleaners with paid and unpaid leave entitlements;
- systems to verify and monitor visa holders' right to work in Australia;
- financial viability;
- systems for the responsible management, monitoring and enforcement of labour subcontracting;
- adequate WHS systems, policies and procedures, to provide cleaners with a healthy and safe work environment;
- mechanisms in place to reduce the risk of worker exploitation, e.g. sham contracting, underpayment, modern slavery, etc., and considered ways in which it can provide cleaners with job security at a change of contract.

CAF's objective is to end exploitation in property services and improve work standards through education and advocacy by:

- supporting sustainably priced and efficient cleaning services
- ensuring compliance with workplace laws and regulations
- engaging and educating workers and supply chain stakeholders
- fostering accountability and transparency in cleaning supply chains
- recognising stakeholders who have implemented best practice standards





Assessing Effectiveness

Mandatory Criterion 5

This section addresses mandatory criterion 5 of the Modern Slavery Act 2018, pursuant to sections 16(1)(e).

This section provides an outline of the steps taken by the Company to review the effectiveness of actions to assess and address modern slavery risks during the reporting period

Consolidated Property Services recognizes that assessing the effectiveness of our actions is a key element of our commitment to continuous improvement. The ways in which we have measured effectiveness in the reporting period are listed below. Insights gathered from these measures inform our Modern Slavery strategy and the scope of work for the ESG Committee.

- Regularly reviewing our progress agreed KPI's within the ESG Committee, reporting to the Board of Directors
- Regularly reviewing and assessing the effectiveness of our policies, codes, operating standards and procedures as they relate to modern slavery.
- Monitoring frequency and trends of whistleblowing and grievance channels. During the reporting period, we did not identify any potential modern slavery risks from the incidents raised via these mechanisms.
- Monitoring rates of training completion. In the reporting period up to 80% of eligible participants completed our ethical training suite of modules.
- Engagement with suppliers beyond initial assessment via the annual modern slavery due diligence checks conducted to enhance awareness of modern slavery.
- Retaining third party certification in International Standards of Compliance.
- Monitoring our third-party audit results and applying corrective actions to our sites and integrated management system





Strong Risk Oversight:

Consolidated is deeply committed to being a highly regarded cleaning services organisation and understand that governance is a key contributor towards realising this goal.

By implementing effective and transparent governance policies we have managed internal and external stakeholders in a consistent and robust manner. The construction of our governance policies reflects Consolidated's values and ethics, that guide employees and management to make better decisions for long term value.

In the reporting period, our ESG Committee has been formed to oversee the performance and deliverables against our objectives and targets. Our assessment of Modern Slavery Risks is embedded in the agenda of our ESG committee meeting and discussions. The committee provides quarterly updates to the Board.

Assessing the effectiveness of the actions taken to assess and address the risks of modern slavery practices In our operations and supply chains, is both internal governance (governance structures) but also internal and external consultation.



Consolidated Governance and Reporting Workflow



Communication and consultation within the organisation and with interested parties

In the report period:

- Our internal communication/consultation and governance is driven by the reporting workflow (shown above).
- Our Consolidated Environmental Social & Governance Committee meets to discuss and manage our approach to modern slavery, sharing information and resources relevant to the management of modern slavery risk. This group includes representatives of Consolidated's Compliance, Risk, Procurement, Sustainability and People & Culture business units, all of whom are accountable for their functional areas across all business units.
- Our Risk Working Group meets monthly to consult on and discuss, health, safety and environmental inspections, plans, projects, case studies, training completion rates and broader operational risks. This monthly meeting includes findings from third-party audits, recertifications and corrective action implementation, centred on continuous improvement.
- Part of the CAF third party audit process is to complete one-on-one interviews with workers on working conditions, training and pay.
- In relation to our supply chain risk, procurement representatives from all of our business units meet bi-monthly with a standing agenda item in relation to our modern slavery risk program.
- Our major suppliers were also involved in workshops, covering topics of Modern Slavery and Ethical Supply Chains.
- These suppliers were also briefed in preparation for third party supply chain audits covering payroll and working conditions, which will be finalised in the next reporting period.
- Our Modern Slavery Statement was published on the Modern Slavery Statements register and the Consolidated Property Services website for communication to all interested parties.





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