



Quad Services

MODERN SLAVERY STATEMENT 2021

Quad Services Pty Ltd
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Quad Services Pty Ltd (Quad) provides cleaning, security and building maintenance services across Australia and New Zealand. This Modern Slavery statement is made in accordance with the Australian Modern Slavery Act 2018 (MSA) for the financial year ending 30 June 2021. This statement describes our actions to identify and address modern slavery risks during the period under review.

MODERN SLAVERY – THE PERSPECTIVE

Modern slavery involves the most severe forms of exploitation. It includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour. Our approach has been to try to identify, and then attempt to minimise these risks within the Quad operations and supply chains.

OUR POSITION

At Quad Services, we foster an organisational culture that supports all internationally recognised human rights and ethical sourcing practices and seeks to avoid complicity in human rights abuses, including modern slavery. We aim to identify, assess, and manage modern slavery impacts within our spheres of influence and activities.

Quad is committed to developing and maintaining systems and processes to avoid involvement in modern slavery or human trafficking. Quad opposes any human rights violation. We recognise that our corporate and social responsibilities apply not only to our own activities but also to those within our supply chain.

As part of our ongoing commitment to continuously working towards the elimination of modern slavery, we continue to invest time and resources to reduce the risk of modern slavery in our operations and supply chain, to develop appropriate controls and to take appropriate action if modern slavery is identified within our operations or supply chain.

Our approach to addressing modern slavery risks in FY2020-21 has focused on:

- conducting awareness training for Management and staff,
- undertaking risk assessment,
- reviewing Quad's policies, and
- engaging with suppliers.

Mandatory Criteria One and Two:

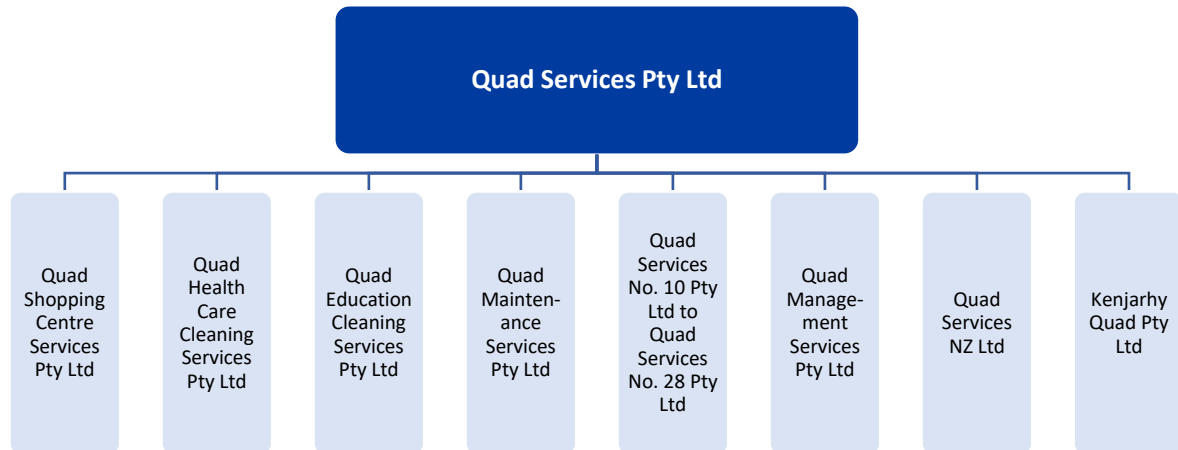
Identify the reporting entity and describe its structure, operations, and supply chains

THE QUAD COMPANY STRUCTURE

Quad Services Pty Ltd, ABN 58 000 308 592, is a privately owned Australian Company registered in New South Wales. Our Head Office is located at 12 Carlotta Street, ARTARMON NSW 2064.

Quad owns and controls several other entities for employment, administrative, and financial purposes. Quad also operates services in New Zealand and operates a joint venture indigenous 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:

- Australian Property Council
- Building Service Contractors Association of Australia
- Building Service Contractors of New Zealand
- Australian Security Industry Association Ltd
- Facilities Management Association
- Green Building Council of Australia
- Clubs NSW
- Supply Nation

ABOUT QUAD

Formed in Australia in 1972, Quad initially provided cleaning services in the North Shore area of Sydney. By the 1980's Quad had developed into a significant provider of cleaning services in the Sydney Metropolitan area. Since then, we have become a leading provider of cleaning and associated building services in Australia and New Zealand, with \$100M+ in turnover, 2200+ skilled, trained, and

vettted cleaning, security, and maintenance personnel, 50 experienced management staff, 700+ contracts, and offices in all Australian states and territories and in New Zealand.

Quad is certified to Quality Management System ISO9001, Environmental Management System ISO14001 and Occupational Health and Safety Management System AS/NZS 4801.

Our mission is to help our clients improve their facilities' safety and environment quality by delivering world-class security, cleaning, and associated services.

OPERATIONS AND SUPPLY CHAIN

The Quad operations structure consists of Operations teams responsible for designated geographical areas. By having a limited area to cover, our operations teams can more closely monitor activities on the ground and facilitate the application of Quad policies at the coalface of our operations. As the team managing our services at the site level, they play an important role in ensuring an absence of Modern Slavery practices in our service delivery.

The Quad supply chain consists of suppliers based within Australia. However, some of the items supplied to Quad are manufactured overseas and our mapping process has already identified that some products are obtained from high-risk regions (according to the Global Slavery Index).

Suppliers to Quad are required to undertake a rigorous registration process at the commencement of the supply of services. This process is coordinated by our compliance team. Service suppliers are required to provide regular updates.

Our actions in the FY2020-21 reporting period are covered later in this statement.

Mandatory Criterion Three:

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls

POTENTIAL RISKS OF MODERN SLAVERY

The risks of Modern Slavery mean that Quad can cause, contribute to, or be directly linked to modern slavery through our operations and supply chain.

In Quad's assessment there is a greater risk of modern slavery in our supply chain than in our own direct operations. The structured and embedded process of employment of personnel within our operations almost eliminates the risk of modern slavery practices in our engagement process.

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

- suppliers not complying with applicable employment laws; or
- arrangements that may be dubious; or
- suppliers not providing a safe workplace; or
- placing expectations to deliver services that would place workers at risk.

We apply these risk factor considerations to our ongoing operations and to all our suppliers with whom we have a direct relationship.

OUR SUPPLY CHAIN

Over the reporting period, based on consultation with our suppliers, Quad has refined how we categorise our suppliers. We have amended our broad classification to:

Tier 1	Those suppliers from whom we purchase directly
Tier 2	Those suppliers from whom our tier 1 suppliers purchase
Tier 3	Those suppliers from whom our tier 2 suppliers purchase

Quad uses the following criteria to assess the risk of modern slavery in our supply chain:

- Procurement value
- Goods or services supplier
- Types of goods or services purchased
- Location of supplier (geography)
- Global Slavery Index 2018

We recognise that we need to look beyond our tier one suppliers, and we have identified that some Tier 2 suppliers are based in high-risk regions. Our risk assessment of these suppliers was planned to commence in this reporting year, but it has been delayed due to disruptions we have experienced. We plan to commence in the next reporting year and to provide updates in future Modern Slavery Statements.

Mandatory Criterion Four:

Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes

KEY AREAS OF ACTION IN FY2020-21

Like many other businesses in 2021, Quad Services continues to be impacted by the effects of COVID-19.

Quad continues to undertake the following:

- Continuing to raise awareness about the Modern Slavery Act requirements with our people and suppliers to help them identify and manage modern slavery risks in our business operations and supply chains via:
 - Regularly communicating with our internal teams and suppliers
 - Providing training to our operational teams and leaders about the risks of Modern Slavery, our procedures to raise concerns and our actions to eliminate or remediate
 - Engaging with our suppliers about their requirements when partnering with Quad
 - Creating specific information posters raising awareness about Modern Slavery and our grievance processes
- Increasing our understanding of modern slavery risks across our operations and supply chain via:
 - Engaging with subject matter experts regarding Modern Slavery
 - Attending webinars and other educational activities about Modern Slavery
 - Regular Quad Modern Slavery committee meetings to discuss and consider Quads actions to mitigate the risk of Modern Slavery
- Embedding specific wording about Quad's expectations of suppliers about reducing the risk of modern slavery in our supply chain. For example, we have updated our:
 - Supplier Code of Conduct
 - Supplier agreements
 - Grievance processes
 - Remediation processes
- Updating and embedding our other processes and policies to includes references to Modern Slavery and Human Rights where appropriate
- Mapping our supply chains
- Updating our supplier onboarding due-diligence arrangements to include modern slavery considerations
- Responding to and participating in client-initiated modern slavery reviews/assessment projects
- Liaising with CAF (Cleaning Accountability Framework) to obtain pre-qualification. Quad sees partnering with CAF as important.

ADDRESSING MODERN SLAVERY RISKS

Quad has taken steps to mitigate the risk of modern slavery in our operations and supply chain. We continue to engage with our largest suppliers, and we continue to educate our local suppliers that are not required to report under the current Modern Slavery Act.

For this FY2020-21 reporting period, our actions and effectiveness are described below:

Consultation

We recognise that the cleaning industry is still a higher risk sector with potential exposure to modern slavery practices. Consultation with our largest suppliers and clients continues. In line with the stringent requirements of our larger clients, the knock-on effect is that Quad is broadening its approach to consultation and methods used to collect information.

Quad hopes to partner formally with a software provider such as Informed365 or Sedex in the next financial year to improve our consultation and risk assessment.

Policies

Policies and procedures are regularly reviewed to ensure they are compliant with applicable legislation. Training for these policies and procedures is provided to all our employees. Our supplier code of conduct has undergone further refinement during the reporting period.

Quad has committed to partnering with an eLearning provider (Sentrient) to assist in the delivery of both eLearning (including Modern Slavery) and our policies and procedures.

Contracting

Quad has included appropriate clauses into our supplier agreements. Our contractor onboarding documentation has been updated to reflect Quad's position on Modern Slavery and the contractors' requirements to comply. All new suppliers are provided with our new onboarding details and our existing contracts are being brought up to this standard.

Training

Quad Services requires that all employees undertake training in awareness of modern slavery. Our leadership team undergoes a further training on their responsibilities and how to mitigate the risk of modern slavery.

Our current employee induction for our operational staff includes our actions to reduce the risk of Modern Slavery, processes to report and remediation steps.

Our Compliance team continues to engage and deliver training to our suppliers with Modern Slavery being part of that training.

Whistleblowing

Quad has a mechanism for employees, clients, and contractors to raise concerns. These concerns may be raised anonymously if required. Our dedicated confidential whistleblowing reporting facility is monitored by executive management daily.

An external third-party is retained where concerns raised require external investigation or remediation.

Mandatory Criterion Five:

Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks

MEASURING EFFECTIVENESS

Quad's action to mitigate the risk of modern slavery are subject to review by our Modern Slavery Committee.

Quad regularly assesses conformity with all our policies and procedures, including checking compliance with our supply processes.

For this reporting period Quad did not identify any instances of modern slavery directly associated with our operations. No clients or suppliers raised modern slavery concerns. Further, no modern slavery related problems were submitted by our employees.

OUR NEXT STEPS

To continually improve our approach, we are planning to undertake the following actions in FY2021-22:

Policy	<ul style="list-style-type: none">• Continue to review and update• Invest in software to support our training and eLearning
Engagement	<ul style="list-style-type: none">• Consult/engage with our suppliers and our clients
Risk	<ul style="list-style-type: none">• Review risk profile of our supply chain• Invest in software to support our consultation and risk assessment
Training	<ul style="list-style-type: none">• Invest in software to support our training and eLearning• Act on findings to reduce/eliminate modern slavery risks
Communicate and report	<ul style="list-style-type: none">• Communicate with staff, clients and suppliers, report on findings and progress
Remediate	<ul style="list-style-type: none">• Work with the relevant parties to remediate any incidence of modern slavery practice

Mandatory Criterion Six:

Describe the process of consultation with any entities the reporting entity owns or controls

Quad has a Modern Slavery Committee to provide guidance and support on our response to Modern Slavery.

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

APPROVAL

This statement was approved by the principal governing body of Quad Services Pty Ltd on 20 January 2022.

A handwritten signature in black ink, appearing to read 'A. Yardley', with a long horizontal line extending to the right.

Andrew Yardley

Chief Executive Officer