

Assetlink Services Pty Ltd

Modern Slavery Statement Reporting Period 2019/2020





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CEO & MD Message

Assetlink Services Pty Ltd is committed to reducing the risks of modern slavery in our business operations and supply chains, and to managing incidents where they might occur. This commitment is important to us, as well as our stakeholders, customers and employees.

We have zero tolerance of slavery, and we expect the same commitments from our Suppliers. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains and to ensure that there is transparency in this regard.

Assetlink is pleased to publish this our first Modern Slavery Statement, approved by our Board of Directors, which outlines our approach to address and minimise the risk of modern slavery in our business operations and supply chains. Assetlink's Anti-Slavery Policy and Standards of Business Conduct, which is supported by extensive policies, procedures and processes, has been put in place to help minimise this risk. This is further underpinned by a robust governance process.

Assetlink has designed and implemented a risk-based approach and is committed to continuously improving our processes. This includes engaging with our direct suppliers to educate, assess and encourage improvement in their own capacity to manage modern slavery risks within their broader supply chains.

We will continue to collaborate with our internal and external stakeholders to address our own modern slavery risks and to improve strategies to identify and mitigate modern slavery and ethical sourcing risks.

Aurora Fonte

Chief Executive Officer and Managing Director



Mandatory Reporting Criterion

This Modern Slavery Statement covers the activities of Assetlink Services Pty Limited ABN 89 061 914 55 and associated entities as informed by the Commonwealth Modern Slavery Act 2018, for the period 1 July 2019 to 30 June 2020 (FY20).

To meet the seven mandatory reporting criteria, our statement is structured as follows.

Section 1: About Assetlink, our Structure, Operations and Supply Chain

Section 2: Risk Assessment

Section 3: Risk Mitigation and Approach to Deal with Risk

Section 4: Assessment of Effectiveness

Section 5: Consultation

Section 6: Training and Capacity Building

Section 7: Looking forward



Section 1 – About Assetlink, our Structure, Operations and Supply Chain



Section 1: About Assetlink, our Structure, Operations and Supply Chain

Assetlink Services was founded in 1993 by Aurora and Franco Fonte. Starting with just 12 employees; Assetlink now directly employs 2200 people. Assetlink has a diverse workforce with our directly employed people hailing from around 80 different countries and speak 59 different languages; and within this group around 40% are female and approximately 3% identify as Aboriginal or Torres Strait Islander peoples.

Assetlink has a culture of inclusion and offers a safe and happy work environment. To support this, Assetlink has a vision, mission, purpose, single-minded proposition, values and signature behaviours that create the framework which is the "Assetlink Way".

Assetlink is constantly striving to improve the Employee Value Proposition and continuously improve the human resources structure and processes to best support the service delivery teams as they go about delivering their core objective – to serve customers.

Our highly skilled and qualified team members deliver professional services to the exacting requirements of our clients and in compliance with our accreditation to:



Operations

Assetlink provides its services to a variety of channels; from large scale national portfolios to single site facilities within the Government, Education, Health, Aged Care, Resource & Industrial, Retail and Commercial channels.

Assetlink's business is service-based with the major portion of its work within the integrated services industry. It is a contracting company and it obtains and retains its contracts to provide services through a tender/negotiation process; resulting in the necessity to continuously improve and identify opportunities to innovate; thereby allowing Assetlink and its people to be a stand out.



When Assetlink is awarded a services contract, this entails our people being deployed to the client's site where they deliver the contracted services, represent the client's brand and partner closely with the client to ensure the success of their business, thereby ensuring the success of ours.

Some of the services offered by Assetlink include:

- Cleaning
- Security
- Concierge
- Valet
- Maintenance
- Grounds
- Village Camp Services for remote mining sites

Assetlink is a national business, with contracts in every state and territory of Australia and offices in Brisbane, Sydney, Melbourne, Adelaide and Western Australia.

We rely on our suppliers and subcontractors to help us deliver outstanding services for our customers and maintain our reputation as an industry leader. We expect our suppliers and contractors to comply with our standards and expectations on modern slavery.

Supply Chain

Assetlink procures a diversity of goods, all pertaining to the integrated facility services which we provide. These services centre heavily around cleaning, and so too do the predominant goods obtained. These include, but are not limited to: janitorial equipment, paper, cleaning machinery, sanitary goods and cleaning chemicals.



Section 2 – Risk Assessment



Section 2: Risk Assessment

The cleaning and security industry is globally recognised as a high risk industry, and Australia is a region known for modern slavery within this sector. The complexity of the industry, the nature of the workforce and the often opaque nature of operations are particularly key concerns. Despite this, Assetlink has identified the risk of modern slavery in Assetlink operations as low. As a large and premium soft property services supplier, Assetlink's supply chain is predominantly labour based (86%), followed by insurance (4%) and then all other spend (consumables, equipment, rent, hygiene services, and other).

As 96% of Assetlink's labour is directly employed, we have direct control over the compliance process – recruitment process, onboarding process, training and continued wellbeing programs that are in place for our sites across Australia. Our robust systems, procedures, and policies ensure that all team members are free from modern slavery risks. Our team members are paid in alignment with the relevant Award, wages are paid by EFT into an individual's bank account and are free from modern slavery risks.

Where additional sub-contracted services are used (e.g. external high glass or hygiene services), Assetlink engages strategic partners via a comprehensive and formal agreement. The agreement includes bi-annual compliance audits that are conducted by Assetlink's Service Provider Compliance Manager. This process is detailed and thorough and ensures that our partners are delivering their service in alignment with relevant standards.

Our long-term suppliers of equipment and products, in particular for our cleaning services, are well renowned and we have worked closely with them for many years.

Out of our three main suppliers of equipment and products, two of our suppliers are based in Australia, and the third is based in the USA.

We are continuing to map our Tier 1 Suppliers and next phase will be to map our Tier 2 Suppliers.



Section 3 – Risk Mitigation and Approach to deal with Risk



Section 3: Risk Mitigation and Approach to deal with Risk

Selecting Suppliers

Assetlink follow a risk-based approach when deciding whether to conduct detailed due diligence on a supplier, based on factors including the goods or services, country of origin and supplier. Before any area of the business contracts with a new supplier, the risk profile of that supplier is assessed against the business criteria and requires high-risk suppliers to complete a risk assessment questionnaire and/or be audited.

New suppliers complete the CM3 online contractor pre-qualification and a Due Diligence Check and Risk Assessment. Assetlink's National Supply Chain Manager, and National Compliance Manager manage and oversee this process. The CM3 pre-qualification includes an Ethical Sourcing Questionnaire which covers key aspects of vendor operations (supply chain, labour hire, employment practices, industry type). Suppliers are assessed to identify the risks of the supplier possibly breaching Assetlink's ethical sourcing and anti-slavery policies.

Ongoing risk assessments and audits are conducted with our suppliers with any non-conformances reported and tracked to ensure closure and resolution. Regular awareness communication on various topics including modern slavery is undertaken with suppliers and employees.

Collaborating with other businesses, government and non-government organisations Assetlink supports the following globally recognised declarations, principles and goals:

- Universal Declaration on Human Rights
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work
- United Nations Women's Empowerment Principles
- United Nations Sustainable Development Goals

Assetlink is a member of the Supply Chain Sustainability School of Australia (SCSS). SCSS aims to create more sustainable supply chains for the property, construction and infrastructure industries in Australia and provides by providing collaborative, accessible education for a sustainable future.

We have also been in discussions with Anti-Slavery Australia with regard to developing customised training for our frontline teams members and our industry. Two of our existing sites that we service are 3 Star CAF accredited and we continue to collaborate with CAF in taking the cleaning industry



forward. We believe that collaboration with industry-wide initiatives, government and non-government organisations is an important part of managing modern slavery risks.

Communicating Assetlink Standards to Suppliers

We work with our suppliers to source goods and services in a manner that aligns with our policies including our Ant-Slavery Policy. We encourage our suppliers to promote best practice and continuous improvement, require our suppliers to comply with certain minimum standards and provide Assetlink with rights of termination if the supplier is unable or unwilling to work towards full compliance with these minimum standards.

Mapping Assetlink's Supply Chains

To manage business and sustainability issues across Assetlink's supply chain, mapping of our tier one suppliers commenced and is still in progress. Mapping of our tier two suppliers will be phase 2.

Building long-term relationships

Assetlink continues to build long-term direct supplier relationships that help us to work with suppliers to safeguard human rights.

Auditing Suppliers

To mitigate the risk of unethical practices occurring in our supply chains, we apply our own modern slavery and ethical sourcing audit programs to certain suppliers using a risk-based approach. Where non-compliance with Assetlink's Anti-Slavery Policy is identified, the supplier is required to remediate the issue. If a supplier then addresses non-compliance, it continues to be an approved supplier. In this way, the audit process is contributing to remediating supplier non-compliance and improving conditions for workers. If a supplier is not willing or able to address a critical breach or it is considered a severe breach, Assetlink will not continue with that supplier.

Training and capacity building

Assetlink maintains an ongoing focus on training and capacity building. Modern Slavery awareness training has been rolled out, together with awareness of Whistleblower hotline and procedures. Further training planned for FY21.

Reporting and monitoring of grievance mechanisms

Assetlink has a Whistleblower Hotline in place as well as an internal process for lodging any grievance. The Whistleblower hotline is an external confidential service. Any and all complaints are reported monthly to the Executive Leadership Team as part of a monthly report. Any matters that need further escalation are reported to the Board.



Section 4 – Assessment of Effectiveness



Section 4: Assessment of Effectiveness

This is Assetlink's first Modern Slavery Statement and outlines the steps we are taking to ensure modern slavery is not taking place across Assetlink or our supply chains.

We recognise we still face many challenges in this complex area, but we are confident that our current policies and processes provide important and robust building blocks from which we can progress our work.

Taking into account our regular audits of our suppliers, training and capacity building, the close and long standing relationships we have with our suppliers, and the processes we've put in place with regard to providing employees and suppliers with an external Whistleblower hotline and grievance procedures, we are able to continually monitor where we and our suppliers are with regard to modern slavery risks.

To date we are not aware of any modern slavery complaints against Assetlink or our suppliers being made through our internal channels, or external channels such as our Whistleblower hotline.

As we put more measures in place to combat modern slavery, we are confident that we will be able to more accurately assess the effectiveness of our actions.



Section 5 – Consultation



Section 5: Consultation

Relationships and collaboration with our suppliers, business partners and relevant government agencies assisted in shaping our strategies on modern slavery.

AS highlighted above, Assetlink is a member of the Supply Chain Sustainability School of Australia (SCSS). SCSS aims to create more sustainable supply chains for the property, construction and infrastructure industries in Australia and provides by providing collaborative, accessible education for a sustainable future. Many of our clients are members of SCSS and together with their internal forums, we are able to collaborate on how we go forward together in the fight against modern slavery.

Discussions with Anti-Slavery Australia with regard to developing customised training for our frontline teams members and our industry is underway. Two of our existing sites that we service are 3 Star CAF accredited and we continue to collaborate with CAF in taking the cleaning industry forward.



Section 6 – Training and Capacity Building



Section 6: Training and Capacity Building

Awareness-raising is crucial in helping prevent and address modern slavery in our business and supply chain.

Assetlink's Modern Slavery awareness online training module has been launched and is mandatory for all employees and suppliers. When commencing employment with Assetlink, our people complete training on our Standards of Business Conduct as part of their induction process. Compulsory refresher training is undertaken annually.

We revised and developed, consulted, communicated and rolled out new and refresher policies and documents including our Anti-Slavery Policy, Whistleblower hotline, Business Code of Conduct, Corporate and Social Responsibility Policy (includes amongst other things - Workforce Stewardship, Freedom of Association, Sustainable Supply Chain, Corruption, Bribery, Distortion, Labour Standards and Human Rights), Inspections, Audits, Complaints and Improvements Policy, Diversity & EEO Policy, Grievance Procedure, Employee Management Policy, supplier audit procedures and related processes, which detail our expectations around modern slavery, sustainable procurement and supplier conduct.

In FY21 an online Procurement induction and training module, will be developed to guide targeted employees through our standardised procurement framework, related tools, reinforcing the need to incorporate modern slavery into procurement planning.



Section 7 – Looking Forward



Section 7: Looking Forward

Assetlink will continue to strive to ensure the prevention of modern slavery through operational and supplier driven processes across our value chain.

We will continue to collaborate with our internal and external stakeholders to address our own modern slavery risks and continue to improve our processes. Several of our processes, including our whistleblower mechanisms, will help track our performance and provide insight into areas for improvement.

In FY 21 the mapping of our Tier 1 Suppliers will be completed and the mapping of our Tier 2 Suppliers will commence. Further risk assessments and audits will continue.,

Further training will be developed and rolled out for all our employees and our suppliers.

The establishment of our Anti-Slavery committee is newly formed and this will be further bedded down, together with the development of a three year Modern Slavery Strategy to ensure we mitigate all risks associated with modern slavery.





Assetlink provides integrated facilities service solutions to all sectors and their respective industries. Through collaborating with clients and combining our expertise, technical capability and innovation, Assetlink is able to provide tailored integrated solutions. With over 3000 people across Australia and New Zealand, Assetlink is helping business and government provide quality services to their clients and to the community.

National Support Office

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