



**Indigenous**  
COMMERCIAL CLEANING



# MODERN SLAVERY STATEMENT

## 1. THE IDENTITY OF THE REPORTING ENTITY

This modern slavery statement is made in accordance with the *Australian Modern Slavery Act 2018* (the Act) for the financial year ending 30 June 2024. The statement is made by SKG Holding Pty Ltd on behalf of its wholly-owned entities and Indigenous partners:

- SKG Cleaning Pty Ltd
- SKG Security Pty Ltd
- SKG Maintenance Services Pty Ltd
- SKG Services Pty Ltd
- Ezko Retail Services Pty Ltd
- Ezko Commercial Services Pty Ltd
- Indigenous Commercial Cleaning

SKG Services (SKG) was established in 1977, providing cleaning, security, and maintenance services across Australia and New Zealand.

Indigenous Commercial Cleaning (ICC) was established in 2018 by SKG's Managing Director, George Manoussakis, in partnership with a young Indigenous leader, Hayden Charles. ICC is the vehicle through which SKG generates employment and training opportunities for Australia's First Peoples.

Ezko Property Services (Aust) Pty Ltd (Ezko) was founded in 1987. For almost 30 years, the company has fostered a reputation within the property services industry for providing personalised, customer-focused, high-quality services.

Ezko was acquired by SKG Services to form the SKG Holdings in 2023.

## 2. OPERATIONS, STRUCTURE AND SUPPLY CHAINS

SKG Holdings Australia Pty Ltd, ABN 23 660 549 226, is a privately owned Australian Company registered in New South Wales. Our head office is located at 22/205-213 Port Hacking Road, Miranda NSW 2228, Australia. All operational, capital and corporate procurement is conducted via the finance department based within the head office. All procurement is subject to strict protocols, procedures and approval processes.

SKG is a minority (49%) co-owner of Indigenous Commercial Cleaning. As a majority Indigenous-owned business, Indigenous Commercial Cleaning is registered with Supply Nation and is the vehicle through which employment and training opportunities are generated for Australia's First Peoples.



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EZKO Property Services was acquired by SKG Services to form SKG Holdings in 2023.

### 3. MODERN SLAVERY RISKS

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.

Modern slavery is highly relevant to Australia owing to our extensive trade links with the APAC region, where most victims of modern slavery are based.

Modern slavery and labour exploitation in the cleaning industry is well documented.

As a large employer, SKG is committed to ensuring modern slavery practices are not present within our business or supply chain.

We consider there to be a greater risk of modern slavery in our procurement supply chain than in our own direct operations.

The structured and embedded process of direct employment of personnel within our operations provides a safeguard against 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.
- Not providing a safe workplace.
- Sourcing equipment, materials and consumables from unethical suppliers.

#### Recap from FY 23/24

In FY23/24 a multi-tiered approach was taken to combat modern slavery.

- SKG took steps to reduce the number of its suppliers, thus ensuring the number of suppliers are manageable.
- All suppliers are Australian based.
- All contractors (not just new) are required to be onboarded in CM3, providing a high standard of contractor management, including WHS and risk management.
- A supplier questionnaire was issued in 2023, targeting all suppliers.
- Our Modern Slavery Policy is required to be reviewed and acknowledged by all new starters as part of their onboarding process.
- We have invested in Sustain Life (now called Workiva) to assist us in tracking our corporate sustainability. This portal allows us to enter all suppliers and vendors and provide targeted communications via the portal which allows us to provide greater insights into our vendor supply



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chains. This allows for monitoring and measuring and provides tangible evidence for public reporting on the progress SKG has made and continues to make. Sustain Life reports on Supplier Assessment (ethical business), Environmental Stewardship, Fair Labour, Modern Slavery & Human Rights, Responsible Purchasing and First Nations Engagement.

- We have an active ESG Committee with tangible targets to ensure ongoing and continual focus on compliance and sustainability on all levels. Monthly reporting on ESG progress is provided to the CEO and Board monthly.

## Next Steps

We recognise that it is essential to maintain a tiered approach to combat modern slavery and are actively implementing and maintaining systems to ensure we can engage with our employees, contractors and suppliers. Activities identified for this reporting period include:

- New service agreements to be issued to ensure service providers are committing to ethical employment practices.
- If a supplier is not able to be onboarded in CM3, that is an indicator to SKG that it is possible the contractor's systems, processes and governance are not aligned with those of SKG. Engagement with all suppliers to have them onboarded through SKGenius and CM3 to take place.
- All suppliers will be entered into Sustain Life/Workiva.
- An updated survey will be generated in Q4 2024 to all suppliers to assess:
  - The extent to which they have mapped their own supply chain, and how.
  - From which countries they source their products and services.
  - Whether they conduct independent/unannounced audits of their suppliers.
  - What policies they have regarding modern slavery and human trafficking.
  - What standards their employees and contractors are obligated to follow, and what are the penalties for non-compliance.
  - What training their employees and contractors undertake regarding modern slavery.
  - What sanctions and remediation processes they undertake if modern slavery is identified in their supply chain.
  - How many employees they have, where, and what sort of employment relationship is involved.
  - Whether they utilise any labour hire.
  - Whether their people have access to independent whistleblowing.
  - Whether they are free from discriminatory practices.
  - Whether the conditions they work in are safe.
  - Their compensation practices.
  - Trade union access.
  - Whether they are aware of low-skilled migrant workers working in their organisation's supply chains.
  - A formal internal modern slavery training pack will be delivered to all employees annually, and upon commencement for all new employees.
  - A modern slavery questionnaire will be issued to all new suppliers/vendors as part of the onboarding process and will be required to be completed prior to providing goods or services to



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SKG.

- We will continue to complete the Property Council of Australia's annual Modern Slavery Assessment.

## **4. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

We foster a 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 are committed to responsible procurement and are using our sphere of influence to improve labour practices in the property services industry. Modern slavery practices, on any level, are not acceptable to our organisation.

We have implemented policies, procedures, and resources to guard against human rights violations. We will dedicate time and resources to reduce the risk of modern slavery in our operations and supply chain, develop appropriate controls, and take appropriate action if modern slavery is identified within our operations or supply chain.

Our approach to addressing modern slavery risks in the current financial year will focus on:

- Expanding and formalising our modern slavery awareness training for staff.
- Entering all suppliers into Sustain Life/Workiva.
- Revision of supplier onboarding processes to ensure we have full awareness of our supply chain at all times.
- Ongoing revision of SKG's policies and procedures to ensure they are always current and identify and address issues of potential modern slavery.
- Review our contracts of engagement to ensure they include ethical procurement clauses.
- Issue a supplier code of conduct to all suppliers and vendors.
- Sophisticated online onboarding system with automated VEVO checks.

## **5. ASSESSMENT OF EFFECTIVENESS**

SKG has ongoing governance and assurance in place around modern slavery and we seek further improvement opportunities during our annual external ISO certification auditing processes and at all times throughout the year.

Modern slavery forms an integral part of our monthly ESG Meetings. All actions are documented in the ESG Committee Minutes and monthly activities are formally submitted to our CEO and Board.

We have not identified any instances of modern slavery directly associated with our operations. No client or supplier has ever raised modern slavery concerns. No modern slavery-related issue or concern has been submitted by any employee.



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## Next Steps

To continually improve our approach, we will undertake the following actions in FY24/25:

<b>Policy</b>	Continue to review and update.
<b>Engagement</b>	Consult/engage with our suppliers and our clients.
<b>Risk</b>	Maintain awareness and review risk profiles of our supply chain. Maintain a manageable number of suppliers and vendors.
<b>Training</b>	Deliver a modern slavery awareness training pack for all employees.
<b>Communication and Reporting</b>	Communicate with employees, clients and suppliers, report on findings and progress.
<b>Remediate</b>	Work with the relevant parties to remediate any incidence of modern slavery practice.

## 6. CONSULTATION PROCESS WITH OWNED OR JOINT REPORTING ENTITIES

SKG's leadership team provides guidance and support on our response to modern slavery.

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

We make this modern slavery statement as an outward demonstration of our commitment to addressing modern slavery risks.

This Modern Slavery Statement was reviewed and approved at the SKG Holdings Advisory Board Meeting held in June 2024, and has been endorsed by George Manoussakis, Group Executive Chairman SKG Holdings and Ezko Property Services, and Director Indigenous Commercial Cleaning, and Hayden Charles, Managing Director Indigenous Commercial Cleaning.

DATED this 31<sup>st</sup> day of August 2024.

**GEORGE MANOUSSAKIS**

Group Executive Chairman, SKG Holdings and  
EZKO Director, Indigenous Commercial  
Cleaning

**HAYDEN CHARLES**

Managing Director, Indigenous Commercial  
Cleaning