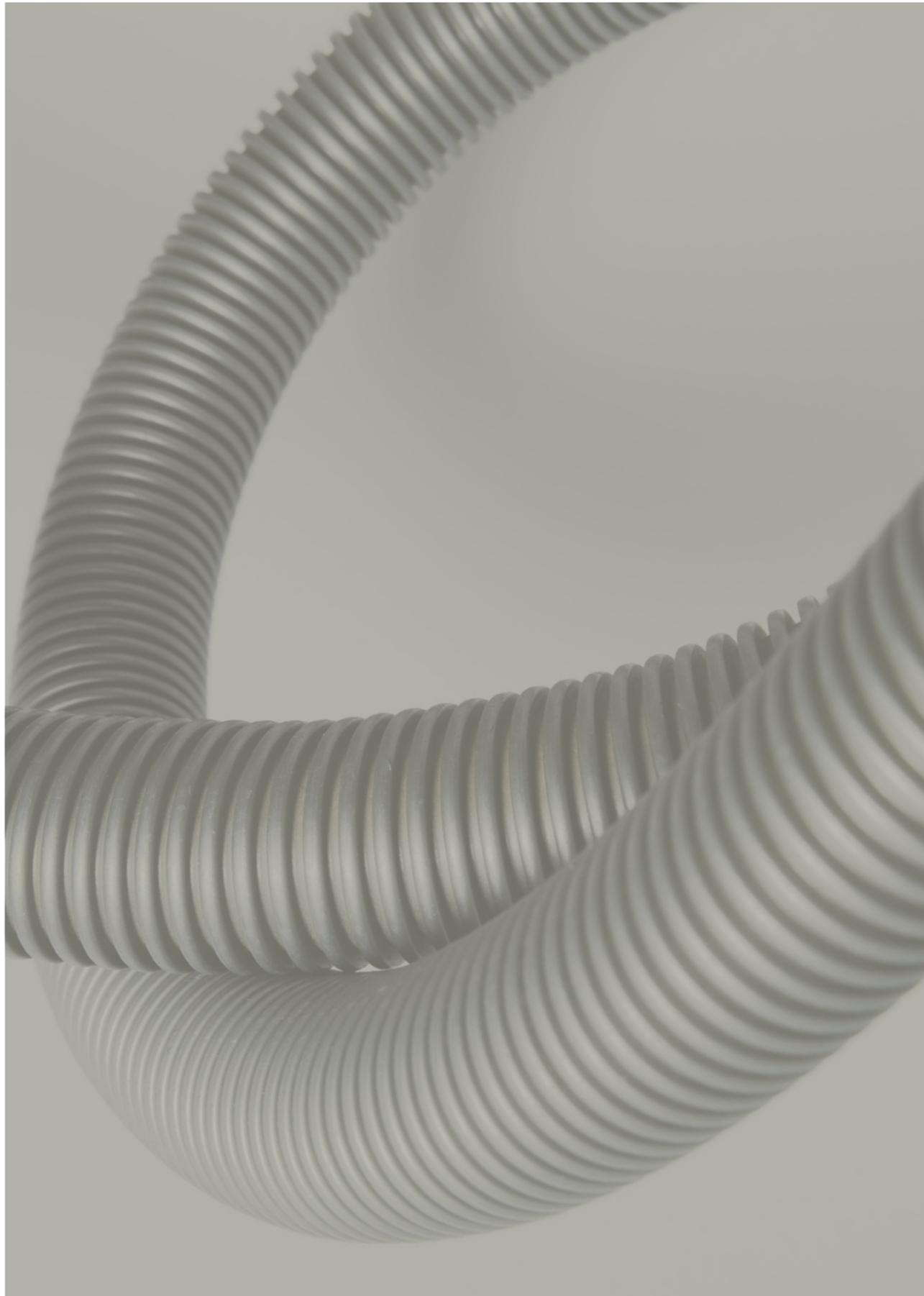


**MODERN SLAVERY,
HUMAN TRAFFICKING,
FORCED LABOUR & DEBT
BONDAGE STATEMENT**

2023





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A MESSAGE FROM OUR CEO AND FOUNDER



Tony Zraybi
Chief Executive Officer



At United Facility Group, we deeply value and respect the dignity and worth of every individual. We stand firmly against all forms of modern slavery, be it Human Trafficking, Forced Labour, or Debt Bondage, as these practices grievously violate human rights. Our commitment to sustainability and human rights is not merely a corporate directive but a deeply ingrained aspect of our culture.



United Nations' 17 Sustainable Development Goals



Inspired by the United Nations' 17 Sustainable Development Goals, we are determined to achieve net-zero emissions by 2030. Furthermore, we actively and empathetically strive to identify and rectify any instances of modern slavery within our operations and supply chains, reinforcing our dedication to a more compassionate and sustainable world.

In the face of continuing global challenges posed by modern slavery and the added complexities due to the COVID-19 pandemic, we at UFG take immense pride in the unwavering commitment demonstrated by our Senior Leadership Team in effectively managing and mitigating modern slavery risks across our operations and supply chains.

Over the past year, we have dedicated considerable resources to enhance and broaden our due diligence processes for suppliers and subcontractors, specifically targeting those who are vulnerable to modern slavery. As a company that has chosen not to subcontract, we at UFG exert direct control over all facets of our labour practices. This encompasses the hiring, training, remuneration, and management of our employees. By doing so, we are able to considerably diminish the risk of modern slavery within our operations. This is facilitated by our ability to implement and enforce our stringent labour standards and compliance measures, reflecting our unwavering commitment to ethical labour practices.

An integral part of our strategy has been a sustained focus on education and awareness. To this end, we have been diligently rolling out various training programs and information materials targeted at our staff and internal networks. These efforts aim to underline our responsibilities to counteract modern slavery, as well as ensure that every member of our organisation and extended supply chain is equipped with the necessary knowledge to recognise modern slavery indicators and has a clear understanding of the procedures to follow in case modern slavery is identified within our scope of operations or supply chains.

Building on the foundation of our previous Modern Slavery Statement, this new edition particularly underscores the measures we have undertaken during this reporting period. We remain steadfast in our mission to manage modern slavery risks in all aspects of our operations and supply chain, and we wholeheartedly accept our responsibilities under the Modern Slavery Act 2018. Our continual strive towards a slave-free world represents not just a statutory obligation, but a moral imperative that underpins the core ethos of our company.

WHO WE ARE

Established in 1985, United Facility Group is a vibrant testament to the visionary entrepreneurship of our Founder and CEO, Tony Zraybi. Born out of a genuine passion for excellence, UFG has grown to become a beacon of financial capability and Aussie pride in the commercial cleaning industry.

Our headquarters, located in the vibrant heart of Melbourne, serves as a dynamic hub from which we coordinate our expansive network of dedicated contract managers and professional cleaning team. Our reach extends across regional Victoria and into Melbourne, ensuring we are always ready to deliver the best services to our clients.

Since our humble beginnings, UFG has carved out a genuine reputation as a premier provider of cleaning services in the tertiary education sector throughout Victoria. We've been privileged to foster an environment conducive to learning, contributing to the successes of countless students and educators over the years.

35+ years

UFG is the leading Commercial cleaning service provider in Victoria for University's and Tafe's for more than 35 years

878

878 Direct Employees with 65% of our cleaning cohort being women and 60% of our management staff being female

100%

100% Victorian – our Business operates State wide minimising risks for Modern Slavery through a localised and controlled management system



OUR RISK MANAGEMENT PLAN & ORGANISATIONAL STRUCTURE

Our comprehensive Modern Slavery Risk Management Plan serves as a strategic roadmap, encompassing internal policies and tools that effectively address modern slavery across our entire business and supply chains.

This plan not only facilitates the monitoring of our actions but also enables us to refine existing measures or adopt new instruments to combat forced labour and modern slavery more effectively.

With a clear focus on eradicating modern slavery and forced labour within UFG supply chains, our risk management plan evaluates the factors that contribute to the practical effectiveness of our actions. It delves into potential risks and examines the potential consequences that modern slavery poses to our company. By thoroughly assessing these risks, we can develop appropriate responses and actions based on the level of risk identified.

The risk management plan also outlines the allocation of resources and identifies responsible personnel who play a pivotal role in the implementation of our modern slavery risk management strategies. By designating these resources and individuals, we ensure a structured and coordinated approach in tackling modern slavery within our operations and supply chains.

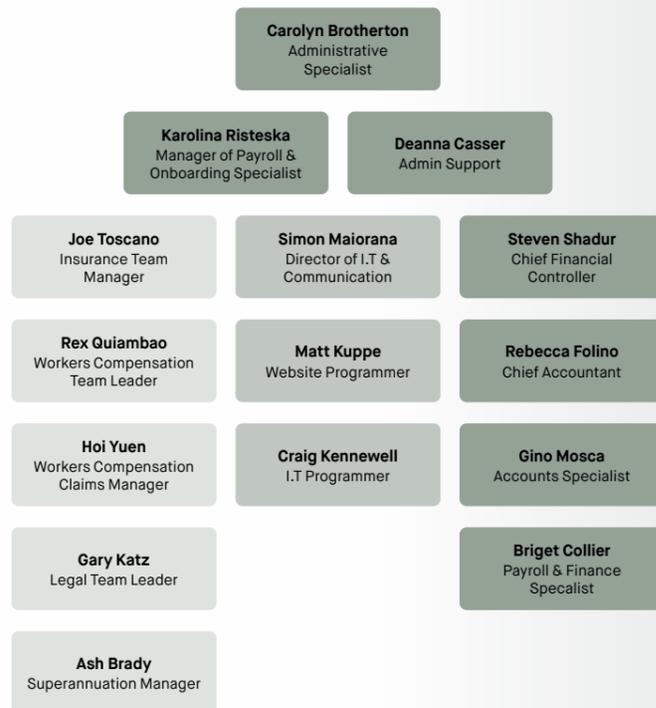
Through the careful development and implementation of our risk management plan, we are committed to mitigating the risks associated with modern slavery and upholding our responsibility to combat this abhorrent practice. By aligning our actions with this plan, we demonstrate our dedication to creating an environment free from modern slavery and reinforcing ethical practices throughout our organization and supply chains.



**SEE ORGANISATIONAL
STRUCTURE PAGE OVER**

UFG ORGANISATIONAL STRUCTURE

ADMINISTRATIVE TEAM

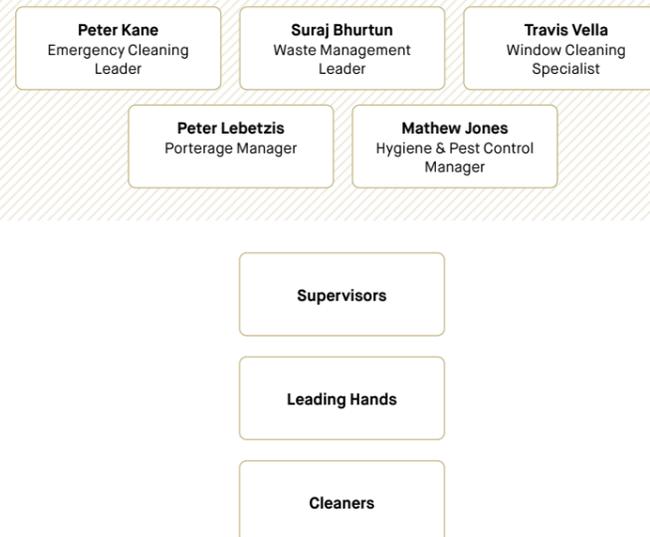


EXECUTIVE LEADERSHIP TEAM

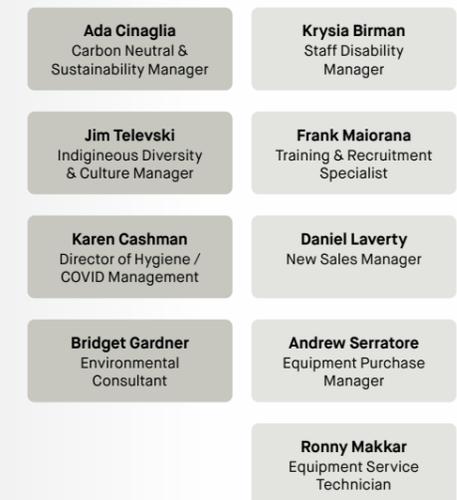


SPECIALIZED PERIODICAL TEAM

Roaming All Sites



SUSTAINABILITY, HR & SERVICES TEAM



OUR GOVERNANCE FRAMEWORK

Within our organization, we have dedicated resources to address the critical issue of modern slavery. Our esteemed Modern Slavery Compliance Officer assumes the pivotal role of coordinating our comprehensive modern slavery risk management response.

This dedicated individual spearheads our esteemed Modern Slavery Working Group, ensuring a cohesive and proactive approach to combating this grave concern. Under their guidance, we have developed a robust modern slavery action plan and road map. This strategic framework serves as our compass in the ongoing battle against modern slavery. The Compliance Officer assumes full responsibility for overseeing the implementation of this plan, meticulously tracking progress and ensuring its effective execution.

To facilitate an integrated approach, all matters pertaining to modern slavery risk and compliance, both within our operations and across our extended supply chain, are channelled through the Modern Slavery Compliance Officer. This accomplished individual takes prompt and decisive action, working in close collaboration with the wider Modern Slavery Working Group established by our organization, known for its expertise and commitment in this domain.

Recognizing the utmost importance of this issue, the Modern Slavery Compliance Officer holds a significant position within our Senior Management Team. Regular reporting is a vital aspect of our commitment to transparency and accountability. Hence, the Compliance Officer provides comprehensive quarterly reports to our esteemed Risk and Sustainability Committee, sharing updates, progress, and key insights into our modern slavery risk management initiatives.

By integrating modern slavery risk management into our organizational fabric and ensuring robust compliance mechanisms, we are steadfast in our commitment to eradicating this heinous crime. Our Modern Slavery Compliance Officer, supported by our dedicated Working Group and the oversight of the Senior Management Team, enables us to forge ahead with a resolute determination to make a tangible difference in the fight against modern slavery.

OUR POLICIES

At the core of our organization, we have established a robust framework of policies and procedures that reflect our deeply ingrained values, define our preferred ways of operating, and set clear expectations for both our esteemed team members and trusted suppliers. This framework undergoes regular review to ensure its relevance and effectiveness in maintaining our high standards.

Central to this policy framework is our unwavering commitment to providing a safe and respectful environment for all individuals associated with our organization. We prioritize their well-being and acknowledge that everyone should be treated in a manner consistent with our shared expectations. In instances where individuals perceive treatment that deviates from these expectations, we have established grievance mechanisms to empower them to voice their concerns.

With utmost clarity, our policies equip our team members and suppliers with a comprehensive understanding of what we stand for and the behaviours we endorse. They serve as guideposts, enabling individuals to readily identify instances that are inconsistent with our principles. Equally important, these policies outline the steps to raise a grievance or lodge a complaint, ensuring that those who have experienced mistreatment or witnessed violations have a safe and effective means to seek resolution.

Among the array of policies, we have implemented, several take centre stage in our ongoing efforts to prevent and address modern slavery within our organization and supply chains. By focusing on these specific policies, we diligently safeguard the well-being and rights of our team members and workers who are most vulnerable to exploitation and abuse.

Through these meticulous policies, we foster a culture of accountability, transparency, and fairness, where grievances and complaints are met with swift action and genuine concern. We firmly believe that an organization is only as strong as its commitment to addressing and rectifying any missteps, ensuring that the well-being and dignity of all individuals remain at the forefront of our operations.



**OUR POLICIES DETAILED
ON PAGE OVER**

Whistleblowing Policy

We place great emphasis on fostering a culture of transparency and accountability throughout our organization. As a result, we wholeheartedly encourage our staff, valued customers, and trusted business partners to promptly report any concerns that may arise in relation to the Company's direct activities or the intricate web of our supply chains.

Recognizing the importance of open communication and shared responsibility, we have established a robust reporting system to ensure that all voices are heard and any potential issues are swiftly addressed. By actively engaging with our stakeholders and creating a safe space for expression, we strive to uncover any wrongdoing or areas of improvement, allowing us to take decisive action and uphold our commitment to ethical practices

Employee Code of Conduct

At the heart of our organizational values lies our comprehensive Code of Conduct, meticulously crafted to provide clear guidance to our employees regarding the actions and behaviours expected of them when representing our Company. This indispensable document serves as a compass, outlining the principles and standards that govern our collective conduct and ensuring that we maintain the highest levels of integrity and ethical behaviour in all aspects of our operations.

Our Code of Conduct serves as a cornerstone, instilling a deep sense of responsibility and accountability within our workforce. It encompasses a wide range of areas, including but not limited to professionalism, respect, honesty, fairness, and compliance with legal and regulatory frameworks. By articulating these expectations, we create a cohesive and harmonious work environment, where every employee understands their role in upholding our core values.

- **Acting fairly, with due care, and in the best interests of the company and shareholders:** We prioritize fairness and diligence in our actions, ensuring that we act in a manner that benefits our company and shareholders while upholding ethical standards.
- **Honouring commitments to customers:** We value our customers and are dedicated to fulfilling our promises and obligations to them, striving to deliver exceptional services.
- **Demonstrating honesty and integrity, avoiding improper payments or gains:** We uphold the highest standards of honesty and integrity in our business dealings, refraining from engaging in any form of improper payments, benefits, or gains.
- **Using information and property responsibly, ensuring safety and security:** We recognize the importance of responsible handling and protection of information and company property, safeguarding them from unauthorized access or misuse.
- **Fostering a safe and inclusive working environment with respect for one another:** We promote a workplace culture that values safety, inclusivity, and respect, where all individuals are treated with dignity and fairness
- **Making positive and sustainable contributions to the economy, society, and environment:** We are committed to making a positive and lasting impact on the economy, society, and environment in the areas where we operate, taking into consideration the long-term well-being of communities.
- **Communicating responsibly and using technology appropriately:** We emphasize responsible communication practices, ensuring transparency and accuracy in our interactions. We also recognize the importance of using technology ethically and appropriately within our business operations
- **Individual accountability for compliance with the Code's principles:** Each of us takes personal responsibility for adhering to the principles outlined in the Code, recognizing that our actions and choices reflect our commitment to ethical conduct and upholding the values of our organization.

Supplier Code of Conduct

Our Supplier Code of Conduct embodies the expectations we have for all our suppliers. It encompasses a wide spectrum of social, environmental, and safety-related criteria, ensuring compliance with modern slavery and labour rights regulations. We hold our suppliers accountable for upholding these standards and practices in their operations.

By setting clear expectations through our Supplier Code of Conduct, we establish a framework that encourages suppliers to operate in a manner consistent with our values. This enables us to build sustainable relationships with suppliers who share our commitment to social responsibility, environmental stewardship, and the well-being of workers. Together, we strive to create a supply chain characterized by integrity, fairness, and respect for human rights.

Within our Supplier Code of Conduct, we emphasize the importance of adhering to social, environmental, and safety-related requirements. This entails a commitment to combat modern slavery and uphold labour rights, ensuring fair and ethical treatment of workers throughout the supply chain. We actively seek suppliers who align with these principles and who share our dedication to responsible business practices.

OUR VALUES

Our values represent our company's purpose and commitment to Modern Slavery eradication. This has come about through feedback from our staff, Stakeholders and the community.



WE ARE BETTER WHEN WE WORK TOGETHER

At UFG we believe that the true measure of success in business lies not only in individual achievements but in the collective power of collaboration, where the synergy of diverse talents, ideas, and efforts propels us beyond what we could accomplish alone.



WE MAKE CHOICES THAT ARE IMPACTFUL

The value of making impactful choices extends far beyond financial gains, as these deliberate decisions become the cornerstone of a purpose-driven legacy. With each thoughtful action, we have the opportunity to ignite transformative change, leaving an indelible mark on society and creating a brighter future for generations.



WE SHOW COMPASSION

In the realm of business, compassion is not just a virtue, but a transformative force that cultivates trust, fosters resilience, and ignites a ripple effect of positive impact, propelling both individuals and organizations towards a brighter and more meaningful future.



WE HONOUR OUR ROLE AS SERVICE PROVIDERS

We remind ourselves of our purpose and role as service providers and to carry that responsibility with integrity and full appreciation of how our service resonates with those we work with.

OUR OPERATIONS AND SUPPLY CHAINS

Supply Chain Composition and Compliance

Our supply chain for human resources primarily operates within Victoria, where the majority of our cleaning services are carried out by our directly engaged employees. We take pride in maintaining a workforce that is predominantly comprised of our own dedicated staff, ensuring direct control and accountability over the cleaning services we provide.

In addition to our internal workforce, we do engage several sub-contractors for specialized services that are not specifically related to general cleaning. It is important to note that these sub-contractors are also based in Australia and fully comply with the requirements outlined in the Modern Slavery Act of 2018. We have taken deliberate steps to ensure that all our supply chain partners align with our values and meet the standards set forth in our Modern Slavery Statement.

Diverse Supply Chain Components

As an organization committed to ethical sourcing in line with the Modern Slavery Act 2018, we prioritize the following steps when procuring chain supplies.

Firstly, we conduct thorough due diligence on suppliers to ensure their adherence to ethical practices, including fair labour conditions and respect for workers' rights. We carefully assess their policies, certifications, and participation in social compliance initiatives.

Secondly, we prioritize suppliers who provide transparency regarding their supply chains, enabling us to verify that no modern slavery is involved. We seek suppliers who can trace the origins of their products and demonstrate a commitment to responsible sourcing.

Thirdly, we actively engage in open and constructive communication with our suppliers, encouraging them to address and mitigate any potential risks of modern slavery within their own supply chains.

Lastly, we continuously monitor and evaluate our suppliers' compliance with ethical standards, ensuring a sustainable and responsible supply chain for our cleaning supplies that aligns with the principles of the Modern Slavery Act 2018.

HOW WE MANAGE OUR SUPPLY CHAIN

1 Cleaning supplies

We engage with suppliers to source high-quality cleaning products and materials required for our services.

2 Specialist cleaning services

For specialized cleaning needs, we partner with reputable providers who possess the expertise and resources to deliver exceptional results.

3 Uniforms and personal protective equipment (PPE)

We collaborate with suppliers to acquire uniforms and necessary PPE to ensure the safety and professionalism of our workforce.

4 Consumables

Suppliers of consumable items such as paper products, hygiene supplies, and other necessary materials play a vital role in supporting our day-to-day operations.

5 Specialist equipment hire

When specialized equipment is required for certain cleaning tasks, we work with trusted providers who offer equipment rental services.

6 Plant and equipment

We engage suppliers for the procurement and maintenance of essential plant and equipment used in our operations.

7 Biohazards

For the proper handling and disposal of biohazardous materials, we partner with licensed and compliant providers who adhere to strict safety protocols.

8 Waste collection

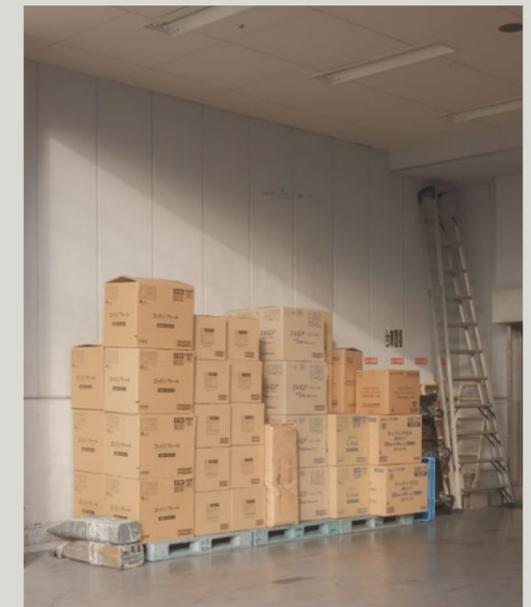
We collaborate with waste management companies to ensure responsible collection, recycling, and disposal of waste generated during our operations.

9 Equipment repairs

When maintenance or repairs are necessary for our cleaning equipment, we rely on trusted suppliers who offer reliable and timely services.

10 Vehicle and administration support

To facilitate smooth operations, we engage with suppliers for vehicle maintenance, fleet services, and administrative support.



” Our Supply Chain is intentionally localized within Victoria as part of our risk mitigation strategy and commitment to supporting local businesses and job creation. By maintaining a focus on local sourcing, we aim to minimize risks associated with offshore supply chains. This approach aligns with our support for the **Jobs First Initiative**, prioritizing the well-being of our community and economy by fostering local employment opportunities and contributing to the growth of the region.

RESPONSIBILITY FOR MODERN SLAVERY STATEMENT

The management team at UFG and the Modern Slavery Compliance Officer holds the responsibility for administering and overseeing our Modern Slavery Statement.

They are entrusted with ensuring compliance with anti-slavery and human trafficking measures, both within our organization and across our supply chain. Through their vigilant efforts, we strive to maintain transparency, uphold ethical practices, and continuously evaluate and improve our processes to combat modern slavery effectively.

In 2019, we integrated our first Modern Slavery Statement. This marked the beginning of an ongoing and dynamic process, as we remain committed to constantly learning from other companies and their approaches to mitigating modern slavery risks. As a crucial step in this journey, we have meticulously developed a comprehensive approach that will serve as a structured method in addressing modern slavery risks now and in the future.



HOW WE IDENTIFY RISKS IN OUR OPERATIONS AND SUPPLY CHAINS AND HOW WE TAKE ACTION

1. Occupational and Industry Related Risk

Risk Indicator	Analysis of Consequences	Risk Level	Response	Responsibility
Low wages, underpayment of wages and entitlements	<ul style="list-style-type: none"> Staff members who are vulnerable may be at risk of exploitation. Inability to meet contractual obligations. 	LOW	<ul style="list-style-type: none"> Increase visibility over Supply chains. Procurement processes to comprehensively address labour rights laws Limit or end use of sub-contractors Engage with industry mentors such as CAF for reinforcement 	Payroll Manager Human Resources
Dangerous work, performed at night or out of sight	<ul style="list-style-type: none"> Increased potential for vulnerable workers to be exploited. Heightened risk of Injury 	LOW	<ul style="list-style-type: none"> Limit work where staff are alone, ensure they are working alongside or close to others. 	Site Managers Supervision Staff
Online and on-site trainings	<ul style="list-style-type: none"> Language barriers resulting in misunderstanding and communication. Staff not properly trained to meet requirements set under contract for site induction including awareness of Modern Slavery risks 	MOD	<ul style="list-style-type: none"> Ongoing dialogue, meets and briefings in various modalities to assist various needs of staff. Include interpreters and visual aids to assist and reinforce Opportunities for Staff sharing 	Administration Manager Human Resources
Use of subcontracting and labour hire	<ul style="list-style-type: none"> Increased potential for vulnerable workers to be exploited 	LOW	<ul style="list-style-type: none"> Numerous reporting mechanisms for workers to report any concerns or instances of modern slavery in subcontracting or labour hire arrangements Robust monitoring and auditing system to assess the compliance of subcontractors 	Contract Management Human Resources
Occupational injury	<ul style="list-style-type: none"> Language barriers resulting in misunderstanding Safety concerns 	LOW	<ul style="list-style-type: none"> UFG promotes employee well-being and health through initiatives such as wellness programs, ergonomic assessments, and awareness campaigns. We encourage a healthy work-life balance and provide resources for employees to maintain physical and mental well-being Our OHS team is well trained and ensures training of new staff at induction and onboarding phases with follow up. 	Human Resources OHS Manager

2. Vulnerable Workforce

Risk Indicator	Analysis of Consequences	Risk Level	Response	Responsibility
High numbers of migrant workers making them vulnerable to working rights	<ul style="list-style-type: none"> Staff members who are vulnerable may be at risk of exploitation. Perceived misrepresentation of tasks/work requirements and non-compliance with WHS regulations, posing safety risks. Non-Compliance of UFG policies and procedures 	MOD	<ul style="list-style-type: none"> Ensure our Grievance mechanisms are effective and accessible. Adopt several Grievances mechanisms for the varying staff needs Improve job security by having one on one informed discussions and briefings 	Human Resources
Language barriers	<ul style="list-style-type: none"> Incorrect completion of contract requirements due to language and cultural barriers The heightened risk of exploitation for vulnerable workers. 	MOD-HIGH	<ul style="list-style-type: none"> Ensure multi-lingual translations are available of key Policies, Procedures and Practices New contract managers and supervisors to receive proper induction training Deliver proper induction training to cleaning staff Provide timely communication to the new workforce via WhatsApp/emails and additional training opportunities. 	Human Resources Administration Manager
Lack of access to social networks	<ul style="list-style-type: none"> Vulnerable staff being exposed to exploitation. Heightened Grievances Lowered staff morale 	MOD-HIGH	<ul style="list-style-type: none"> UFG has weekly staff meetings on sites that are both formal and informal to reinforce sense of community and assisting the vulnerable. Develop training programs to ensure relevant expertise to handle grievance matters. 	Human Resources Administration Manager Site Managers
Lack of workplace rights knowledge and reporting	<ul style="list-style-type: none"> Perceived deception regarding tasks / work requirements 	MOD	<ul style="list-style-type: none"> New contract managers and supervisors will receive comprehensive and structured training: <ul style="list-style-type: none"> Modern Slavery awareness Risk management How to report modern slavery New cleaners will receive comprehensive and structured training: <ul style="list-style-type: none"> Modern Slavery awareness Risk management How to report modern slavery 	Human Resources Administration Manager Site Managers

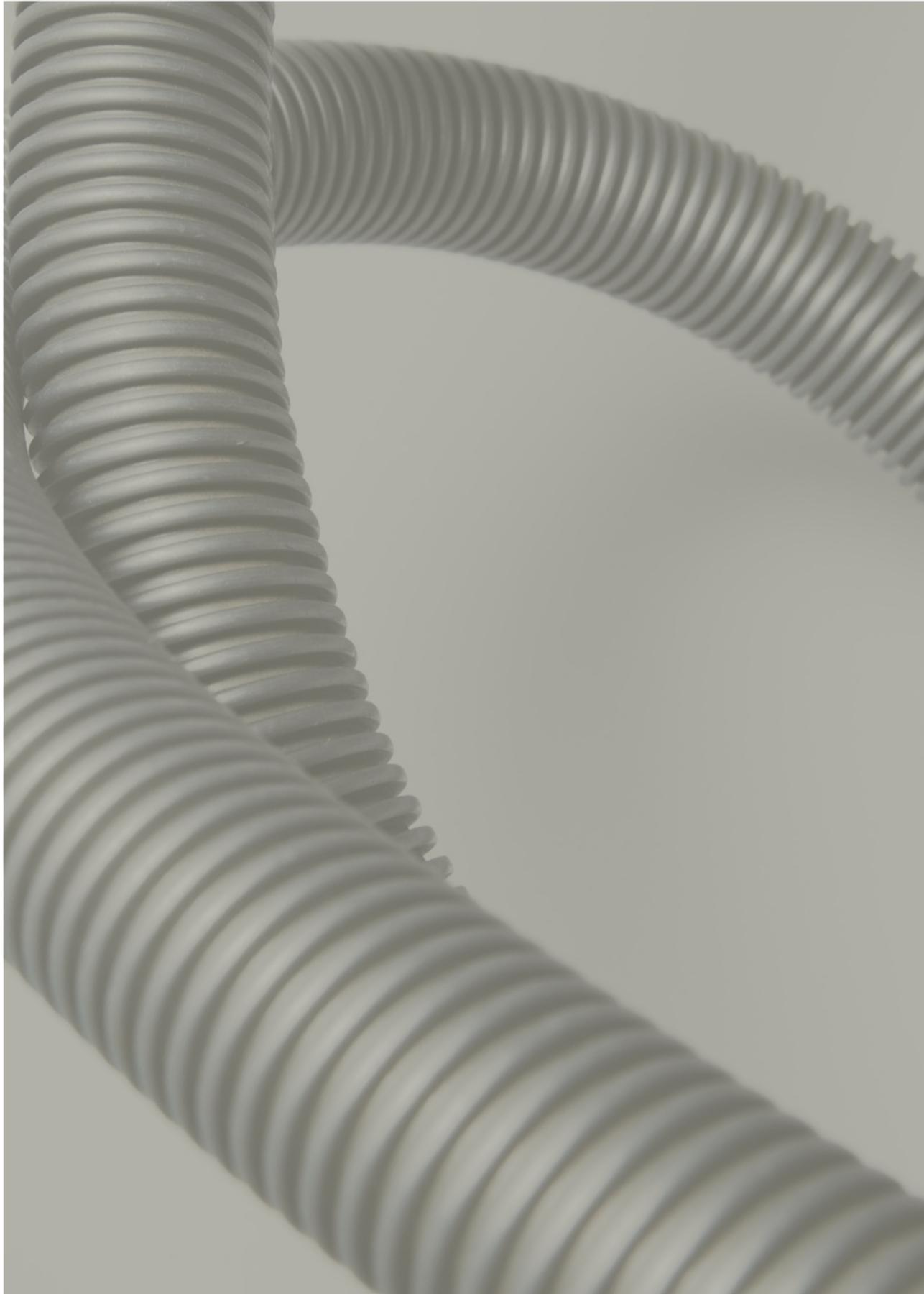
HOW WE IDENTIFY RISKS IN OUR OPERATIONS AND SUPPLY CHAINS AND HOW WE TAKE ACTION

3. Procurement

Risk Indicator	Analysis of Consequences	Risk Level	Response	Responsibility
Insufficient Contract price and transparency on contract pricing	<ul style="list-style-type: none"> Potential industrial action The heightened risk of exploitation for vulnerable workers. Inadequate staffing to fulfil contract requirements 	LOW	<ul style="list-style-type: none"> Staff to be paid at the Legal Award wage and work within safe and acceptable Productivity rates Conduct a thorough cost analysis to accurately determine the true costs associated with the contracted services 	Operations Managers Client Services Management
Lack of contractual obligations regarding human rights due diligence by cleaning contract managers and contractors themselves	<ul style="list-style-type: none"> Industrial disputes Loss of leadership and morale between management and employees 	LOW	<ul style="list-style-type: none"> Include requirements in Contractual arrangements around labour standards and modern slavery risk mitigation. Review and update existing contracts or establish new contracts to include explicit obligations for human rights due diligence Our comprehensive human rights policies that clearly articulate the organization's commitment to respect and uphold human rights within its operations and supply chains Consider engaging independent third-party auditors or experts to conduct assessments and verifications of human rights due diligence efforts 	Operations Managers Client Services Management

4. Contract Management

Risk Indicator	Analysis of Consequences	Risk Level	Response	Responsibility
Lack of regular ongoing mechanisms to assess the risks of modern slavery in a supply chain	<ul style="list-style-type: none"> Industrial disputes Exploitation of vulnerable staff Inability to meet contractual obligations. 	MOD	<ul style="list-style-type: none"> UFG has implemented a Modern Slavery Officer as part of the HR team to govern and assess as part of the operational structure. MSO has full access to our supply chain and also receives ongoing education and support 	Modern Slavery Officer Human Resources Operations Manager
Insufficient resources allocated by lead firms to regular monitoring and enforcement activities.	<ul style="list-style-type: none"> Inability to fulfil contract requirements Staff members who are vulnerable may be at risk of exploitation. 	MOD	<ul style="list-style-type: none"> Clear contractual obligations Robust monitoring systems Collaboration and partnerships: Foster collaboration with lead firms, industry associations such as CAF Provide training and capacity-building programs Establish incentives and recognition programs to encourage lead firms to allocate sufficient resources to monitoring and enforcement activities Conduct regular assessments and reviews of monitoring and enforcement activities to identify gaps and areas for improvement 	Modern Slavery Officer Human Resources Operations Manager



HOW WE REPORT ON AND ASSESS OUR OPERATIONS AND SUPPLY CHAINS



CASE STUDY ENGAGING AND EDUCATING OUR STAFF ON MODERN SLAVERY



Engaging and educating our people is an important component of our Modern Slavery Action Plan. In 2022, we aimed to raise awareness of the issue to lift its profile and draw attention of its relevance to our business.

A survey of 618 staff assessed current levels of awareness on modern slavery and informed content and delivery options of our staff engagement and awareness program. We will use this initial training program to inform a more comprehensive professional development program including eLearning modules for staff on managing modern slavery risk in 2023.

Key elements of our internal awareness program include:

- Briefing sessions with the Senior Leadership Team, Human Resource Director and Modern Slavery Official on the implications of modern slavery to our business and the potential risks in our supply chain.
- Modern slavery information and Fact Sheet on staff portal and induction at onboarding stage
- Developing a Modern Slavery Awareness Training video for access by all staff

OUR POLICY ON REPORTING GRIEVANCES AND LABOUR CONDITIONS IN THE WORKPLACE

We are committed to upholding the principles of the Modern Slavery Act 2018 and ensuring a safe and ethical work environment. This policy outlines the procedures for reporting grievances and labour conditions related to modern slavery within our organization. We encourage all employees to promptly report any concerns they may have, fostering a culture of transparency, accountability, and continuous improvement.

1 Reporting Channels

- A. Employees should report grievances and labour conditions related to modern slavery to their immediate supervisor, Human Resources Department, or Compliance Department.
- B. An anonymous reporting hotline or online platform is available to allow employees to report concerns confidentially if preferred.

2 Documentation and Details

- A. Employees should document relevant details of the grievance or labour conditions, including dates, times, locations, individuals involved, and any supporting evidence or documentation.
- B. The more specific and detailed the report, the easier it will be for relevant authorities to address the issue effectively.

3 Compliance with Reporting Procedures

- A. Employees must comply with the designated reporting procedures established by the organization, adhering to any specific requirements or procedures in place.
- B. Confidentiality will be maintained to the extent permitted by law, and anonymity options will be provided to protect the identity of the reporter, if desired.

4 External Support

- A. If an employee is dissatisfied with the internal reporting process or believes their concerns are not adequately addressed, they may seek external support.
- B. Relevant regulatory bodies, government agencies, or NGOs specializing in labour rights and combating modern slavery can provide guidance and assistance.

5 Non-Retaliation

- A. Retaliation against employees who report grievances or labour conditions related to modern slavery is strictly prohibited.
- B. Whistle-blower protections under the Modern Slavery Act 2018 or other applicable legislation will be enforced.

6 Follow-Up and Progress Monitoring

- A. Employees are encouraged to follow up on reported grievances or labour conditions with the relevant authorities or internal departments.
- B. Regular updates on the progress of investigations or actions taken will be provided to the employee.

▼ Sample of our Supply Chain Survey

MODERN SLAVERY SUPPLY CHAIN SURVEY



As part of our commitment to upholding the principles of the Modern Slavery Act 2018, we kindly request your participation in this survey. The purpose of this survey is to assess the potential risks of modern slavery within our supply chain and gather information on your organization's policies and practices in relation to modern slavery. Your responses will aid us in identifying areas for improvement and collaboratively addressing modern slavery risks together.

Confidentiality: All information provided in this survey will be treated confidentially. The responses will be used solely for the purpose of evaluating and enhancing our supply chain practices in accordance with the Modern Slavery Act 2018.

Instructions: Please provide responses to the following questions to the best of your knowledge and capabilities. If a question is not applicable to your organization, kindly indicate "N/A" in the response field. Should you require additional space to provide further details, feel free to attach separate documents as necessary.

Survey Questions

1. BUSINESS DETAILS

Company name: Contact email:
 Contact person: Contact number:

2. MODERN SLAVERY POLICIES AND COMPLIANCE

A) Does your organization have a written policy specifically addressing modern slavery, as required by the Modern Slavery Act 2018? If yes, please provide a brief overview.

B) How does your organization ensure compliance with the requirements of the Modern Slavery Act 2018?

3. RISK ASSESSMENT AND DUE DILIGENCE

A) Has your organization conducted a formal risk assessment to identify potential modern slavery risks within your supply chain? If yes, please describe the methodology and key findings.

B) How do you undertake due diligence to assess and manage modern slavery risks among your suppliers or business partners?

4. SUPPLIER ENGAGEMENT

A) How do you evaluate and select suppliers to ensure they align with your organization's commitment to preventing modern slavery?

B) What measures are in place to monitor and evaluate supplier compliance with modern slavery regulations and standards?

OUR COMMITMENT TO THE FUTURE

UFG will ensure that if we are awarded, we will commit to taking proactive measures to address the risks associated with Modern Slavery practices. Therefore, we pledge to the following obligations.



By adhering to these obligations, we reaffirm our commitment to combating Modern Slavery and upholding ethical practices throughout our organization and supply chains.

Risk Identification and Mitigation

We will take reasonable steps to identify, assess, and address the risks of Modern Slavery practices within all our operations and supply chains.

Responsibility towards Contractors and Suppliers

We recognize our responsibility to encourage our contractors and suppliers to identify instances of Modern Slavery within their practices. We will provide written notice to these parties, requesting them to take the necessary steps to eliminate Modern Slavery practices from their operations and supply chains.

Reporting and Consultation

In the event that we become aware of any instances or practices of Modern Slavery within our operations or supply chains, we will:

- A) Notify the University promptly, providing information on the proposed steps we plan to take to address and remediate the identified practices in line with the Guiding Principles.
- B) Engage in consultation with the University to discuss and finalize the proposed steps
- C) Upon request and within a reasonable timeframe, furnish the University with a detailed report outlining the actions we have taken to rectify the instances or practices of Modern Slavery identified.

Adherence to University Policies

We will abide by any modern slavery policies notified by Monash University, ensuring alignment with their guidelines and expectations.

Compliance with Modern Slavery Legislation

We will comply with all requirements imposed by the Modern Slavery Legislation.

Modern Slavery Reporting

We will provide the University with an accurate and complete Quarterly Modern Slavery Report

Improve relevant policies to explicitly address modern slavery

Review high-risk first-tier suppliers

Provide human rights and modern slavery awareness training for all employees

Strengthen supplier due diligence processes to consider modern slavery risks

Manage concerns and issues in line with our Corrective Action Policy

Establish key performance indicators to measure our effectiveness in preventing modern slavery and human trafficking

Modern Slavery Statement Approval

This Modern Slavery Statement has been duly approved by the principal governing body of UNITED FACILITY GROUP, serving as the reporting entity. The governing body, consisting of the CEO, Tony Zraybi, has reviewed and endorsed this statement in line with the commitment to combat modern slavery within our operations.

The approval of this statement took place on the 7th day of June 2023, signifying UNITED FACILITY GROUP's dedication to preventing modern slavery and promoting ethical practices throughout its activities.

Approved By



Tony Zraybi
Chief Executive Officer
United Facility Group

07/06/2023

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