

# Modern Slavery Statement for the Year Ending 30 June 2024

Commercial Property Cleaning Pty Ltd (hereafter referred to as "CPC") is committed to addressing modern slavery and human trafficking risks in its operations and supply chain. This statement has been developed in accordance with the Australian Modern Slavery Act 2018 ('the Act') and reflects our ongoing commitment to combatting modern slavery and ensuring ethical practices across our business.

## **Company Profile and Supply Chain**

CPC is a leading provider of commercial cleaning services with approximately 500 staff and directors spread across two offices in Australia. We also have State and Area Managers in other states and territories where we do not have a physical presence. Our operations rely on the dedication and expertise of our cleaning staff and associated workers, who are guided by a comprehensive set of policies and quality management systems.

We work collaboratively with subcontractors, labour suppliers, and other organisations that support the delivery of our services. Additionally, we engage with various support service and product suppliers, including facilities management providers and office equipment suppliers, to enhance the efficiency and effectiveness of our operations.

## **Risk Assessment and Mitigation**

CPC acknowledges that certain aspects of our operations, such as the use of subcontractors and work-visa based staff from overseas countries, can present elevated risks for potential instances of modern slavery and human trafficking. To address these risks, we conduct regular and rigorous risk assessments to identify and evaluate potential vulnerabilities within our supply chain.

## To mitigate these risks effectively, we implement the following measures:

- 1. **Robust Policies and Training:** We maintain a comprehensive set of policies, including a Code of Conduct, Equal Opportunity, Anti-Bullying and Harassment, and Recruitment policies, which clearly outline our commitment to ethical practices. All employees and associates are required to undergo regular training on these policies and procedures.
- 2. **Supplier Engagement:** We aim to engage with suppliers and subcontractors who share our commitment to ethical practices. We have implemented a process to assess and monitor the performance of our suppliers, ensuring they meet our standards and principles regarding modern slavery prevention.
- 3. **Contractual Terms:** We incorporate clauses into our contracts with suppliers and subcontractors that require compliance with ethical standards and principles. These contractual terms outline our expectations regarding the prevention of modern slavery and human trafficking within our supply chain.
- 4. **Third-Party Audits:** Regular third-party audits are conducted to verify compliance with our quality management system, international standards, and modern slavery prevention measures.
- 5. **Staff Training:** We invest in ongoing training for our employees to raise awareness of modern slavery risks and reinforce our commitment to ethical practices. This training includes recognising signs of potential modern slavery and reporting mechanisms.



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#### **Effectiveness of our Approach**

CPC continuously reviews and improves its approach to address modern slavery risks effectively. We actively seek opportunities to enhance our assessment processes for suppliers and subcontractors, and we provide ongoing training to our staff to ensure the proper implementation of our policies.

We are committed to transparency and will report annually on our progress in addressing modern slavery and human trafficking risks within our operations and supply chain.

#### **Approval and Commitment**

This Modern Slavery Statement has been approved by the CPC Board of Management on 26 June 2024, and we affirm our commitment to combatting modern slavery and human trafficking in all aspects of our business.

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