



Modern Slavery Statement FY2022/23

Darling Harbour Live Partnership (ABN 90 967 257 971)

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1. The Reporting Entity

For the purposes of section 13 of the Modern Slavery Act 2018 (Cth) (The Act), the Reporting Entity tendering this Modern Slavery Statement is the Darling Harbour Live Partnership (ABN 90 967 257 971), (DHLP) an unincorporated partnership domiciled in New South Wales.

The purpose of this Statement is to outline our approach to ensuring that DHLP has robust frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chain. DHLP is fully committed to operating responsibly and ethically. We will not tolerate any forms of slavery or human trafficking in our business and supply chains.

The Darling Harbour Live (DHL) consortium, which includes:

- Darling Harbour Live Partnership (DHLP) Partnership (ABN 90 967 257 971) – Project Company;
- Aware Super Pty Ltd (ACN 118 202 672) as Trustee for Aware Super;
- HOSTPLUS Pty Limited (ABN 79 008 634 704) as trustee of the HOSTPLUS Pooled Superannuation Trust (ABN 13 140 019 340);
- ASM Global (Asia Pacific Pty Limited) (ABN 66 154 180 748) – Operator;
- Spotless Services Limited (ABN 97 003 872 848) – Facility Manager; and
- Capella Capital, as agent for the Capella Capital Partnership and the Lendlease Group – Manager

was awarded the Public Private Partnership (PPP) for the Sydney International Convention, Exhibition and Entertainment Precinct (SICEEP), a fully integrated convention, exhibition and entertainment precinct.

As a Public Private Partnership, New South Wales Government retains ownership of the Convention, Exhibition and Entertainment buildings, but benefits from the project company's skills and finances in delivering the project.

DHLP consists of the two equity partners (Aware Super Pty Ltd and HOSTPLUS, both superannuation funds).

Now in the Operations phase, DHLP is responsible for financing, designing, constructing, operating and maintaining the SICEEP facilities.

Definitions used in this document have the same meaning as set in the SICEEP - Project Deed.

2. DHLP Structure, Operations and Supply Chains

Structure

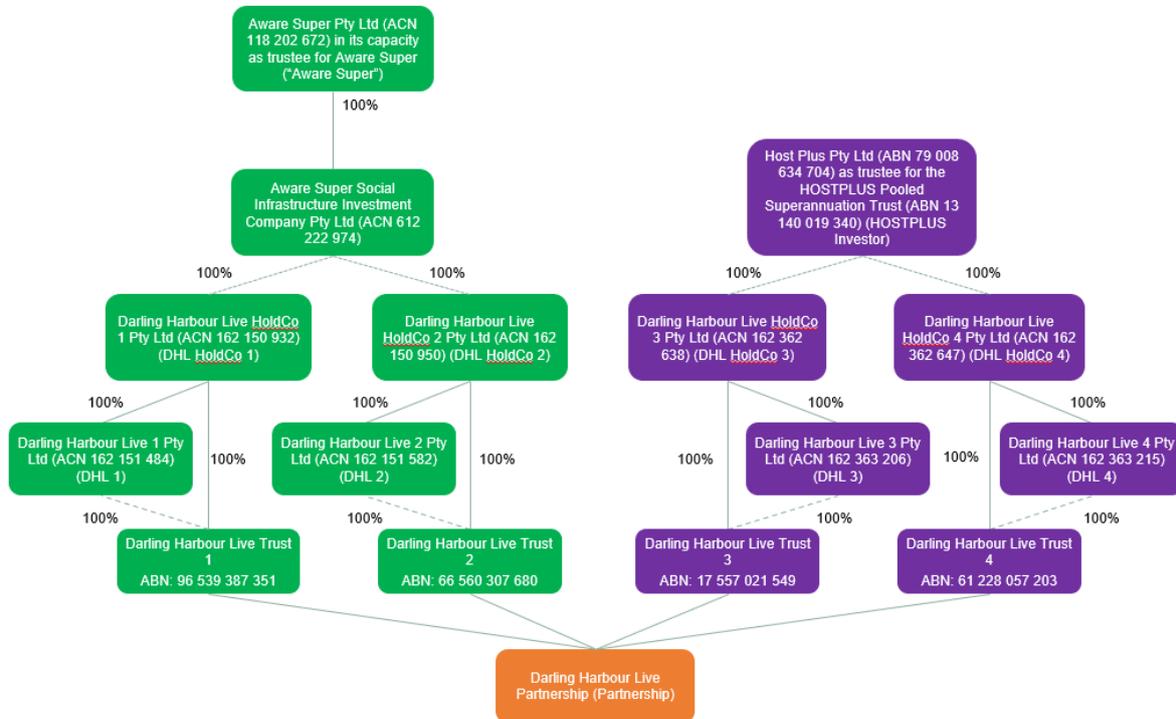
As a partnership between two equity partners, interest in DHLP is held as follows:

- 50% Aware Super Pty Ltd (ACN 118 202 672) as Trustee for Aware Super (held via two trust vehicles Darling Harbour Live Trust 1 and Darling Harbour Live Trust 2); and
- 50% by HOST PLUS Pty Limited (ACN 008 634 704) as Trustee for the HOSTPLUS Pooled Superannuation Trust (held via two trust vehicles Darling Harbour Live Trust 3 and Darling Harbour Live Trust 4).

The DHLP does not own or control any other entities.

The simplified structure chart below outlines the interests:

Darling Harbour Live Structure Chart



- Represents entities controlled by Aware Super Pty Ltd.
- Represents entities controlled by Host Plus Pty Ltd.
- The Darling Harbour Live Partnership is not controlled by either partner as each partner holds a 50% interest.

The table in Annexure 1 summarises DHLP’s structure, operations and supply chains.

Operations and Supply Chains

DHLP is governed by a Project Deed, which sets out obligations for its operations. These include:

- Financing, design, and construction of the Project Works (as defined in the Project Deed with construction completed as of December 2016), as well as
- Maintaining and providing certain Services in connection with the Convention, Exhibition and Entertainment facilities and Public Realm.

There are also requirements for operating the facilities during the Operator Term (25 years) between DHLP, Property NSW and the Sydney Harbour Foreshore Authority, who are the local regulatory authorities overseeing the SICEEP.

Under the Project Deed, DHLP is party to the following agreements, which are the source of DHLP’s supply chain, the works and services, of which are provided on site in Sydney.

- **Operator Agreement (the Operator)** with International Convention Centre Sydney Pty Ltd (ICC Sydney), under which ICC Sydney is to perform Operator Services that DHLP is required to perform under the Project Deed. These services include (but are not limited to):
 - Operator Management services;
 - Customer Service;
 - Event Management;
 - Marketing/Branding/Promotional/Advertising;
 - Food & Beverage service;
 - Cleaning and Security Services; and
 - Car Park Management.

- **Facility Management (FM)** Contract with Spotless Facility Services Pty Ltd (SSL), under which Spotless performs the FM Services to which DHLP is required to perform under the Project Deed. These FM services include (but are not limited to):
 - Facilities Management;
 - Facility Maintenance;
 - Lift & escalator availability;
 - Building Management;
 - Performance monitoring; and
 - Lifecycle management.

- **Construction Contract (The Builder)** with Lendlease Building Pty Limited (LLB), under which LLB was appointed Construction Contractor to perform the development activities, noting Final Completion of the Project Works was achieved in December 2016. Under the Construction Contract Defects are being managed by LLB in conjunction with Spotless and, to date, there are only minor Defects / remediation works outstanding.

- **Management Service Agreement** with Capella Management Services Pty Limited (CMS) under which CMS provides asset management services to DHLP. Asset Management Services include but are not limited to the following Services:
 - Employment of the DHLP management team;
 - Financial reporting including preparation of monthly reporting, annual financial reports and tax return preparation;
 - Adjustments to the financial model; and
 - Company secretarial and compliance support.

- **Associated Business Outlets (ABOs)**, DHLP operates and manages Associated Business Outlets (ABOs). ABOs are retail tenancies in the Precinct that offer food and beverage options, varying in size from kiosks to large restaurants.

DHLP will approach and monitor the responses from the ABOs and report on any findings.

DHLP does not have any employees.

DHLP's CEO and support staff are employed by the Manager, CMS.

3. Modern Slavery Risks in Darling Harbour Live Partnership’s Operations, Supply Chains

In this reporting period, DHLP will continue to focus on high risk areas of its operations and supply chain that have the potential to contribute to or directly link DHLP to forced labour practices arising from activities of entities with whom DHLP has a business relationship.

DHLP is undertaking a human rights risk assessment of its operations and supply chain, in doing so we will take into consideration the following risk factors:

- Industry sector our supply chain operates in;
- Types of products and services provided; and
- Business models of our suppliers.

As a result of this assessment, DHLP has been able to identify potential risk ‘hotspots’ relating to the contractual arrangements with third-party contractors of Operator and Facility Management services who operate in the cleaning, security, food and beverage and event management sectors, as shown in the following graphic:

Modern Slavery Risks – DHLP



- **Operator and FM Contractor Risks**

Pursuant to the Operator Agreement and the Facilities Management Agreement, the contractors (ICC Sydney and Spotless) are providers of hospitality and catering, cleaning, security and maintenance services to DHLP.

DHLP recognises that in relation to services provided by the contractors, there may be elevated risks of labour rights infringements along the contractors' supply chains (especially where labour contracts are subcontracted out to different parties).

DHLP notes in the cleaning, security, event management, and food and beverage services industry there has been a prevalence for sham contracting arrangements, the use of vulnerable low skilled labour and under-pricing contracts, which attempt to bypass employee entitlements, workers compensation, insurances and state payroll taxes in order to undercut competitors and maximise profits.

DHLP is committed to operating its business lawfully and ethically and only working with suppliers aligned to our values. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices. We expect our suppliers to monitor both their own, and their suppliers', compliance with the Modern Slavery Act and to correct any identified deficiencies in a timely manner. We also require them to notify us if they become aware of an actual breach or reasonable likelihood of breaching of the Act.

In relation to the Operator and FM Contractor, DHLP has not identified any instances of modern slavery through our governance meetings and reports, questionnaires and audits during the reporting period.

- **Construction Contractor Risk**

DHLP recognises there may be modern slavery risks in our construction contractor's indirect operations and supply chain. As the construction contractor, Lendlease Building Pty Limited (LLB) may subcontract certain works, and labour risks may arise if, for example, the supply of subcontracted labour is from a non-unionised workforce.

DHLP is relying on LLB's supplier verification procedures to minimise modern slavery risk in its supply chain. As LLB is a wholly owned subsidiary of Lendlease Group, it has access to the modern slavery risk mitigation systems, processes, policies of the Group's supply chain risk function including the Supplier Code of Conduct, information resources such as the Modern Slavery Guide and training for employees.

DHLP will continue to monitor LLB's performance in relation to assessing and monitoring modern slavery risks that may arise in relation to sub contracted and sub-sub contracted works that are performed on site. It is mandatory that, before any works are undertaken on site, DHLP evidences that the sub/sub-sub-contractor has been vetted and understands the expectations set out in Lendlease's Supplier Code of Conduct.

- **Asset Manager Risk**

Under a Management Services Agreement, Capella Management Services (CMS) provides certain asset management services to DHLP.

These services comprise mainly:

- Financial management of the project (financial reporting);
- Payment of invoices;
- Accounts receivable;

- Financial modelling; and
- Employment of DHLP’s management team.

Given the nature of the services provided by CMS (being financial services provided by industry professionals) and as the services provided by CMS are directly provided by employees of Lendlease Corporation (all employees being domiciled and employed in Australia under National Employment Standards) risks relating to modern slavery in CMS’s operations and supply chains has been assessed as LOW.

• **Associated Business Outlets Risk**

Industry heat mapping indicates that modern slavery-type practices and labour right risks may be more predominant in “cash businesses” and fast food & beverage operators using casual/contingent workers, under informal employment and pay arrangements and higher staff turnover rates.

During the reporting period, the DHLP will scope the approach and will perform a risk assessment of the ABO operators to determine the extent of modern slavery /labour rights risks during FY21.

4. Actions Taken to Assess and Address Those Modern Slavery Risks, incl Remediation

During the reporting period, a Risk Mitigation Action Plan will be developed which will considered the steps to assess Modern Slavery/ labour rights risks within DHLP’s supply chain. We work with our suppliers to assess whether they are meeting the mandatory criteria under the Modern Slavery Act including consultation and due diligence requirements, in terms of governance meetings and reports, screening questionnaires and audits, where applicable:



We are also in the early stages of developing a framework for assessing the effectiveness of actions taken to manage modern slavery risk.

In relation to Operator and FM Contracts, DHLP has scoped engagement with the key contractors to understand how they are addressing their modern slavery risks, by requesting their completion of a Modern Slavery Statement to improve DHLP's understanding of their supply chains. DHLP will use this information as a basis of its risk assessment to identify where additional checks are required.

Ongoing assessment of risks will be managed by integrating Modern Slavery/Labour rights reporting into existing business performance reporting processes that DHLP has in place (noting a monthly reporting process to assess the Operator and Facility Managers' compliance with related issues, such as workplace health and safety standards already exists).

DHLP notes that Spotless Facility Services is a wholly owned subsidiary of Downer Group (ASX: DOW), and ICC Sydney is a subsidiary of ASM Global (a global venue management company). DHLP acknowledges that as a subsidiary of a listed entity, Spotless is subject to the Commonwealth Modern Slavery Act and is required to report in its own right.

DHLP also notes that ASM Global operates in the UK and Europe. ASM Global has a UK Slavery and Human Trafficking Statement (in compliance with the UK's Modern Slavery Act) for its European and UK operations, and is working on a similar statement for its Asia Pacific operations.

For ABO Operators:

DHLP note that ABOs are operated by Corporate Hospitality Groups. For the corporate hospitality groups, DHLP acknowledges that for some, Modern Slavery reporting requirements may not apply (because they fall below the AUD\$100M annual consolidated revenue threshold).

In response to recent concerns about under-payment in the hospitality industry, DHLP has begun embarking on a number of actions to assess Modern Slavery/ labour rights risks in relation to ABO operators. This includes, but is not limited to, engaging with all ABO operators to understand how they are addressing their modern slavery risks, for corporate hospitality groups.

Preparing the ground work during the FY20 reporting period was interrupted due to COVID-19. DHLP has resumed the following due diligence with each corporate hospitality group management team into FY21, to understand:

- Whether they are engaging with their key suppliers to understand how modern slavery risks are being addressed down the supply chain, and
- Ask management if any of the following polices are in place and the extent of their embedment:
 - Employee code of conduct
 - Health and safety
 - Diversity
 - Human rights, referencing forced labour/ modern slavery
 - Employment rights, notably with respect to working hours, pay, overtime and overtime rates and entitlements
 - Rights of temporary migrant workers, or vulnerable workers
 - Young workers being of minimum legal age to perform work
 - Procedures for procurement/purchasing/sourcing /subcontracting
 - Whistleblowing/grievance policies
 - Corporate social responsibility

Steps that have been taken to assess modern slavery risks in our supply chain include:

- A review of human rights risk indicators for our suppliers;
- Working with our suppliers to identify if they have appropriate internal policies and procedures including, but not limited to, workers' labour and payroll conditions and workplace practices; and

- Educating and working with our suppliers where needed to assist them implement solutions that meet international human rights standards.

The table below sets out a summary of progression during the reporting period against each of the key risk areas identified in Section 3:

| Modern Slavery Risk Hot Spot | Stage | Modern Slavery RISK Assessment |
|-------------------------------------|---|---------------------------------------|
| Operator and FM Contractor | <ul style="list-style-type: none"> • DHLP has not identified any instances of modern slavery risks through our governance meetings and reports, questionnaires and audits during the reporting period • Operator and FM services use contingent labour which in a competitive contracting market elevates the risk of modern slavery like practices • Progress systemic mitigation measures including modern slavery risk screening, modern slavery due diligence and audit. | MODERATE |
| Construction Contractor | <ul style="list-style-type: none"> • During FY20/21 DHLP relied on Lendlease Building's supplier verification procedures to minimise modern slavery risk in its supply chain. • DHLP (via CMS and LLB) has access to Lendlease Group's supply chain risk assessment systems and processes for modern slavery risk mitigation | LOW |
| Asset Manager | <ul style="list-style-type: none"> • As above - Finance and business services provided by the Lendlease Group through to CMS • DHLP (via CMS) has access to Lendlease Group's supply chain risk assessment systems and processes | LOW |
| Associated Business Outlets | <ul style="list-style-type: none"> • Assessment approach scoped during FY20/21 • Risk Assessments to be performed in FY20/21 | ELEVATED |

DHLP will include an escalation path in our risk framework for modern slavery issues, to ensure accountability and oversight of remediation responses.

5. Assessing Effectiveness of Actions Taken for Mitigating Modern Slavery Risks

DHLP is in the early stages of scoping a framework for assessing the effectiveness of its modern slavery mitigation efforts. During the reporting period, consideration was given to monitoring outcomes and progress against the Modern Slavery Risk Mitigation Plan. Progress had been delayed due to COVID-19.

The intention is that during FY20/21, DHLP will review its progress against the Modern Slavery Risk Mitigation Action Plan. On a six monthly basis, the review will be performed by DHLP's CEO to identify and assess any new risks that may emerge in the course of the Partnership's operations and/ or suppliers' performance. Findings of the reviews will be presented at the regular DHLP board meetings for consideration and response.

Raising Concerns

Ethics Point is Lendlease's platform for confidentially logging concerns around improper conduct. This facility is also accessible to Capella Management Services' employees and suppliers. During the reporting period, there were no matters raised specific to DHLP through Ethics Point.

Training

Members of the Capella Management Services legal team, were also participants in Lendlease Group Modern Slavery training, specifically tailored for lawyers. The training included the integration with recently introduced Whistleblower requirements, and integration with Lendlease crisis management procedures, for investigation, corrective action and remediation.

All employees of Capella Management Services have access to information resources including Lendlease Modern Slavery Guide, Supplier Code of Conduct and associated supply chain risk tools and resources developed by the Lendlease Group.

Further information is set out in Section 5 of the [Lendlease Group Modern Slavery Statement FY20](#), or as updated from time to time.

6. Consultation and Engagement Undertaking on Managing Modern Slavery Risks

Modern slavery risk management requires ongoing collaboration with our suppliers and the mechanisms to assess the effectiveness of actions we undertake to address Modern Slavery include enhanced reporting requirements for the Operator and FM contractor including:

1. Monthly Meetings:

Operator and FM Contractor monthly management meetings will include a standing agenda item for Modern Slavery to facilitate regular engagement feedback and response and feedback on issues as and when they arise.

2. Enhanced reporting:

Monthly Operator and FM Contractor reporting to DHLP to incorporate Modern Slavery reporting. Contractors are required to include details relating to non-conformances and other findings including the number and specifics and resolutions reached.

The following governance process was implemented to provide the DHLP Board oversight of our Modern Slavery action plan:

- Establishment of a Modern Slavery Working Group to effectively manage modern slavery risk and ensure compliance with the Modern Slavery Act. The Group consists of DHLP's CEO/General Manager and Contracts Managers and is supported by the Asset Managers Australian Modern Slavery CoP managed through the Lendlease Group; and
- On a six monthly basis, the Modern Slavery Working Group provided the Board with its findings in relation to assessment of our potential risk hotspots and mitigating actions.

In addition, we have undertaken supply chain engagement this includes:

- Governance meetings to determine the extent to which modern slavery risks are adequately managed, and
- Supplier awareness support materials – we provided our suppliers with our Modern Slavery Fact Sheet to equip our suppliers with the knowledge to identify high risk suppliers

Access to the Lendlease Group Australian Modern Slavery Community of Practice - a forum for information exchange and consideration of modern slavery risk mitigation activities, provides engagement interface to leverage insights and information resources.

Further details on this forum is in Section 6 of the [Lendlease Group Modern Slavery Statement FY20](#), or as updated from time to time.

7. Other Relevant Information

LOOKING AHEAD

DHLP proposes to take the following actions to address Modern Slavery/ labour rights risks within its supply chain in FY21/22:

DHLP will engage constructively with its suppliers through provision of resources and information to build awareness of modern slavery, through the following activities:



This Statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and constitutes the Modern Slavery Policy Statement of DHLP and the entities which it controls, and its development has been considered by the Board of the DHLP.

The Statement has been approved by the Board of Directors of the Darling Harbour Live Partnership who will review and update it as necessary.

Capella Management Services

For Darling Harbour Live Partnership

CEO/General Manager - Signed:



Date: 24 October 2022

Director - signed:



Date: 24 October 2022

Accepted by Resolution by the DHL Board

Date: 24 October 2022

Annexure 1 - Summary of structure, operations and supply chains

Darling Harbour Live Partnership summary of structure, operations and supply chains:

| Structure | Operations | Supply Chain |
|---|--|---|
| <p>Darling Harbour Live Partnership (ABN: 90 967 257 971) unincorporated partnership between the following partners domiciled in NSW:</p> <ul style="list-style-type: none"> • Darling Harbour Live 1 Pty Ltd in its capacity as trustee for the Darling Harbour Live Trust 1 • Darling Harbour Live 2 Pty Ltd in its capacity as trustee for the Darling Harbour Live Trust 2 • Darling Harbour Live 3 Pty Ltd in its capacity as trustee for the Darling Harbour Live Trust 3 • Darling Harbour Live 4 Pty Ltd in its capacity as trustee for the Darling Harbour Live Trust 4 | <p>The partnership was established to carry on the business contemplated in the Project Deed for the Sydney International Convention, Entertainment and Exhibition Precinct (SICEEP).</p> <p>Operations are located at Darling Harbour, Sydney NSW.</p> | <p>Entities Suppliers:</p> <ul style="list-style-type: none"> • ICC Sydney Pty Ltd ACN 154 180 748 • Spotless Facility Services Pty Limited ABN 83 072 293 880 • Lendlease Building Pty Limited • Capella Management Services Pty Ltd • Various ABOs <p>All located in Sydney NSW.</p> |
| | <p>SICEEP was delivered by a Public Private Partnership between the NSW Government and the Darling Harbour Live Partnership involving the design, construction, financing, operation and maintenance of convention, exhibition and entertainment facilities along with the renewal of public realm within a site at Darling Harbour in Sydney.</p> | <p>ICC Sydney Pty Ltd supplier of: operator management services;</p> <ol style="list-style-type: none"> a. Customer services; b. Marketing, branding, promotion and advertising services; c. Events management services; d. Ticketing and box office services; e. Merchandise services; f. Corporate hospitality and membership services; g. Corporate partnership and sponsorship services h. Food and beverage services; i. Cleaning services j. Operator FF&E services k. First aid and medical services; l. Security services; Commercial management m. Services n. Car parking <p>Services are provided in Sydney NSW</p> <p>Spotless Facility Services Pty Limited supplier of:</p> <ol style="list-style-type: none"> a. Facility management; |

| Structure | Operations | Supply Chain |
|--|---|--|
| | | b. Planned preventative maintenance; c. Reactive maintenance; d. Lifecycle replacement; e. Condition Based Survey; f. Maintenance of art collection; g. Facility Management FF&E; h. Building Management System and security technology performance assessment, monitoring and reporting; i. Utilities management; j. Facility Management Plan; k. Asset Register; Services are provided in Sydney NSW Capella Management Services supplier of: Asset Management services Financial asset management services to the Partnership: Services are provided in Sydney and Melbourne. |
| Registered Office: Level 14, Tower Three International Towers Sydney, Exchange Place 300 Barangaroo Ave Barangaroo NSW 2000 | Darling Harbour Live Partnership entered into the following agreements for the delivery of its obligations under the Project Deed: <ul style="list-style-type: none"> • Operator Agreement with ICC Sydney Pty Ltd ACN 154 180 748 • Facility Management Contract with Spotless Facility Services Pty Limited ABN 83 072 293 880 • Construction Contract with Lendlease Building Pty Limited • Management Services Agreement with Capella Management Services Pty Ltd | |
| The Darling Harbour Live Partnership does not own or control any other entities and does not employ any employees. | | |

Annexure 2 - Operator and FM Contractor questionnaire

From the questionnaire below results that are BASIC will be considered unsatisfactory and DHLP will report to the supplier that further development and remediation will be required to be undertaken.

Results that are INTERMEDIATE or ADVANCED satisfy DHLP's minimum requirements (advanced responses represent best practice) with no further investigation or remediation required.

| Issue | Risk | Action | Assessment ranking | Response |
|---|---|--|--|--|
| I. Has the supplier performed a risk assessment in relation to the modern slavery/labour rights in its operations and supply chain to deliver the services to DHLP? | If no risk assessment has been performed, then the supplier may have not identified potential MS/labour rights risks. | DHLP to assess what level of detail the supplier has undertaken of MS/labour rights assessments of their operations and supply chains and whether these assessments were performed by third parties, internally or are in process. | <p>Basic: The supplier has not assessed its MS/labour rights risks</p> <p>Intermediate: Supplier has assessed labour rights risks in its own operations and is addressing big ticket issues.</p> <p>Advanced: Supplier has undertaken a comprehensive MS/labour risk assessment of its own operations and its supply chain and has developed processes to address the risks identified.</p> | A risk assessment is currently on foot in relation to modern slavery/labour rights in the company's supply chain (including to deliver the services to DHLP). Any identified risks and actions taken by Spotless to assess and address those risks, including due diligence and remediation processes, will be included in Spotless' modern slavery statement which will be submitted in accordance with the <i>Modern Slavery Act 2018</i> (Cth) by 31 December 2020. |
| II. Are policies in place covering: <ul style="list-style-type: none"> • Human rights/modern slavery; • Overtime hours/overtime rates; • Migrant Workers | A lack of policies may indicate that there are significant gaps in risk assessments for MS/labour rights | DHLP to request Operator/FM to provide copies of policies in place | <p>Basic: no /few policies available, lack of understanding of issues.</p> <p>Intermediate: Policies are in place covering key issues.</p> <p>Advanced: Well developed policies and understanding of MS/labour rights issues.</p> | Yes, the following policies are in place: <ul style="list-style-type: none"> • Human Rights Policy • Whistleblower Policy Further, Spotless' industrial instruments and employment contracts cover overtime hours/overtime rates. |

| Issue | Risk | Action | Assessment ranking | Response |
|--|--|--|--|---|
| <ul style="list-style-type: none"> • Procurement/purchasing/sourcing/subcontracting • Whistleblowing/grievances • Corporate Social responsibility | | | | |
| III. Does the supplier report on Corporate Social Responsibility publicly? | Public reporting on human rights supports transparency and accountability | DHLP to obtain copies of relevant CSR reporting, annual report or any other similar documents. | Basic: Private company with no CSR reporting in place Intermediate: Some public reporting in place identifying labour risks. Advanced: Supplier publishes reporting on labour/rights risks and actions taken to address these issues, has KPI's/goals/targets in place. | Spotless will have reporting in place once the Company wide assessment has been completed as stated in response to I. |
| IV. How well does the supplier know their supply chain, has the supplier mapped their supply chain? | Greater visibility over the supply chain means better control over MS/labour risks | Suppliers to provide DHLP evidence that supply chain has been investigated for potential MS/labour rights risks. | Basic: No documentation of supply chain Intermediate: Supplier has documented Tier 1 suppliers Advanced: Supplier has documented its entire supply chain for MS/labour rights risks | Spotless has documented the supply chain and is conducting an assessment as stated in response I. |
| V. Will workers be engaged directly to perform the services under the Operator & FM contract or will the | Multiple layers of subcontracting and labour hire agencies limit transparency and may increase the | DHLP to make enquiries of the supplier as to whether subcontracted or third parties are used, determine the extent of visibility over use. | Basic: No visibility or oversight or use of sub-contractors. Intermediate: Expectations that sub-contractors comply with applicable labour laws and standards. | Spotless self-delivers and is compliant with applicable labour laws and standards, the subcontracted components of the service are screened and periodically audited depending on the service type ie Cleaning is done more frequently. |

| Issue | Risk | Action | Assessment ranking | Response |
|--|---|---|--|--|
| services performed by sub-contractors and other third parties contracted to ICC Sydney/Spotless? | likelihood of labour rights issues. | | Advanced: risk assessments are performed of sub-contractors in relation to human rights. | |
| VI. Does the Operator/FM use young workers, migrant workers? | Young workers and migrant workers are at particular risk of exploitation including: <ul style="list-style-type: none"> • Deceptive/exploitative recruitment practices • unfair/unlawful payment practices | DHLP to request Operator/FM to provide information on how they address migrant worker/young worker risks. | Basic: No policy in place to address risks associated with young/migrant workers; Intermediate: Policy in place for the protection of young/migrant workers Advanced: Human rights policy in place labour hire providers are screened or audited. | As per V. |
| VII. Will workers receive wages in accordance with national legal minimum wage or industry standards | Wages must meet the legal minimum wage. | DHLP to request Operator/FM to confirm that policies are in place to ensure adherence with award wages. | Basic: There are concerns that wages are not paid in accordance with national standards. Intermediate/Advanced: Wages meet national legal minimum wages. | Wages meet national legal minimum wages for all services supported by Spotless for DHLP. |