



Consolidated
est. 1977

2021 Modern
Slavery
Statement



Arthur Mallios
Chief Executive Officer

Foreword



Consolidated have created a culture where we celebrate success knowing it is our people who deliver on our client needs and help us shape our corporate identity. Our Cultural Principles outline our promise to our people ensuring a safe, respectful and rewarding workplace. Our people enjoy coming to work and are positive and energetic about the roles they play in our company's success.

With over 3000 skilled team members throughout Australia, we have a vast talent pool which has enabled us to offer career pathways to our cleaning teams, as well as having a plethora of potential and emerging future managers of our business. Our large and diverse workforce is vast and varied. We embrace people from all backgrounds, ages and genders.

Consolidated staff are all directly engaged employees. We do not use any subcontracted labour and all employees are paid in accordance with the relevant industrial instruments. As an ethical business, and in response to the Modern Slavery Act, we ensure we work with businesses who share our values. All suppliers within our supply chain are required to meet strict guidelines to ensure we meet our legislative requirements in accordance with the Modern Slavery Act.

Acknowledgement of Country

Consolidated Property Services (Australia) Pty Ltd acknowledges the traditional owners of country throughout Australia, and their continuing connection to land, water and community. We pay our respects to them and their cultures, and to Elders past, present and emerging and extend that respect to other Aboriginal and Torres Strait Islander people

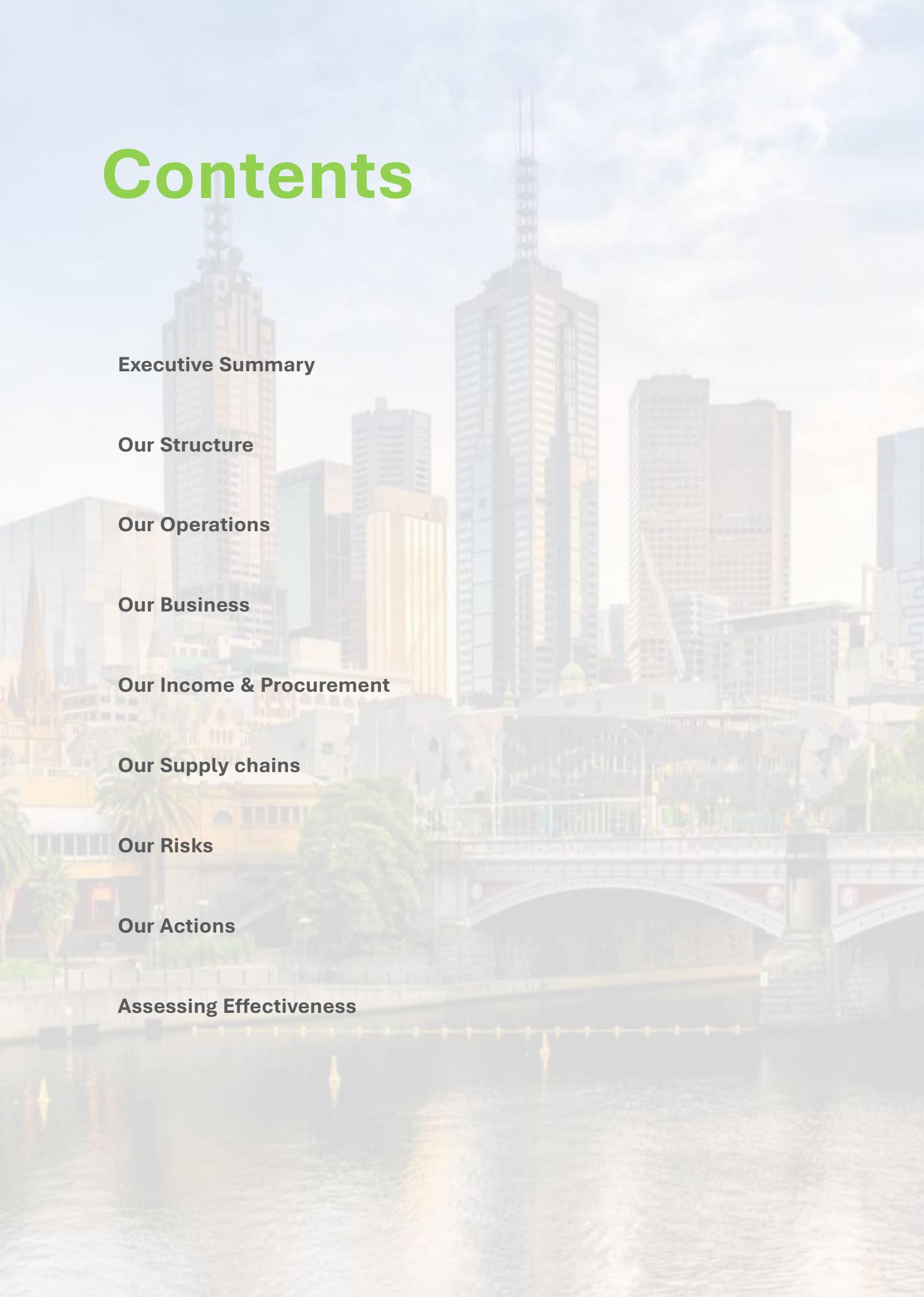
As a business, we advocate for increasing standards in our industry to assist in the abolition of human rights violations such as slavery, human trafficking and child labour.

Consolidated believes that by incorporating the Ten Principles of the UN Global Compact into strategies, policies and procedures, and establishing a culture of integrity, Consolidated are not only upholding the basic responsibilities to people and planet, but also setting the stage for long-term success.

As part of Consolidated's contribution to discussions surrounding the improvement for our cleaning staff, we continue to promote CAF amongst building management, building owners and unions ensuring that we are across this framework to better integrate this across the industry. Consolidated fully supports the CAF principles as they are aligned with our values. It highlights the importance of responsible contracting practices.

We understand that the world is continuing to evolve in this area, and we embrace the opportunity to do our bit to help raise awareness of modern slavery practices and continuously improve our practices to ensure it does not happen in our business and/or supply chains.

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The background of the page is a faded, light-colored image of a city skyline. In the foreground, there is a river with a bridge. The sky is blue with some clouds. The text is overlaid on this background.

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Executive Summary

Consolidated Property Services Pty Ltd (Consolidated) was formed in 1977 by John and Mary Grant and began operations servicing suburban commercial office, retail and industrial sites. Business growth throughout the last four decades saw Consolidated transform its business model from suburban cleaning contractor to one of Australia's largest professional cleaning providers servicing some of the highest profile commercial and retail sites in the property industry.

The company boasts a highly developed infrastructure and sophisticated business support systems that includes: People & Culture; Safety, Quality Assurance & Compliance; Finance & Administration; Sales & Marketing; Sustainability; Innovation & Development and Operations.

Being a privately-owned Australian organisation with a close-knit management team enables Consolidated to offer our clients high levels of service flexibility, response and most importantly, strong relationships and communication channels at all levels of the business.

We recognise that our people are the key to our success. Consolidated has a strong ongoing succession management plan in place ensuring that we retain high quality people. We will continue to drive continuous improvement in customer service and staff management ensuring key values and mission of the company are maintained.



Our Modern Slavery Statement

This is our second Modern Slavery Statement produced in accordance with the reporting requirements under the Modern Slavery Act 2018 (Cth), which was approved by the Board on 17 December 2021.

This Statement reflects work undertaken by Consolidated Property Services to address modern slavery risks in our supply chains and operations during the 2020-21 Australian financial year.

Any feedback or queries relating to our Modern Slavery Statement can be sent to:

Consolidated Property Services (Aust) Pty Ltd (ABN: 54 006 727 484)

144 Moray Street South Melbourne VIC 3205

☎ 03 8633 8200

E: info@consolidated.com.au



Proven track record

- 44+ years' experience cleaning premium & A Grade assets
- Australian owned and operated servicing blue chip customers
- Over 3000 staff servicing more than 350 contracts throughout Australia
- Strong relationship with Industry stakeholders
- Experienced and dedicated team



Ethical & Compliant Provider

- Industry Preferred Supplier
- Multi-site, multi-state CAF 3-star accredited buildings
- All Consolidated staff directly employed
- All wages and entitlements compliant with relevant industrial instruments
- We do not engage labour hire or sub-contracting



Our People & Safety Program

- Industry Employer of Choice
- Heavy investment in training, development, recognition and reward programs for staff at all levels of the business
- BE SAFE safety program is the foundation for all learning
- ISO Certification for Quality; Safety and Environment

Consolidated supports the Property Council of Australia's lead in addressing modern slavery risks across the property sector by directly hiring all of our cleaning staff to perform our core cleaning work.

Consolidated support the Cleaning Accountability Framework (CAF) principles as their values aligned with our values, highlighting the importance of responsible contracting practices.

Consolidated have achieved CAF Contractor Prequalification which aids clients when wanting to achieve CAF Building Certification due to Consolidated having the right systems in place to enable the provision of decent work to cleaners at their workplace.



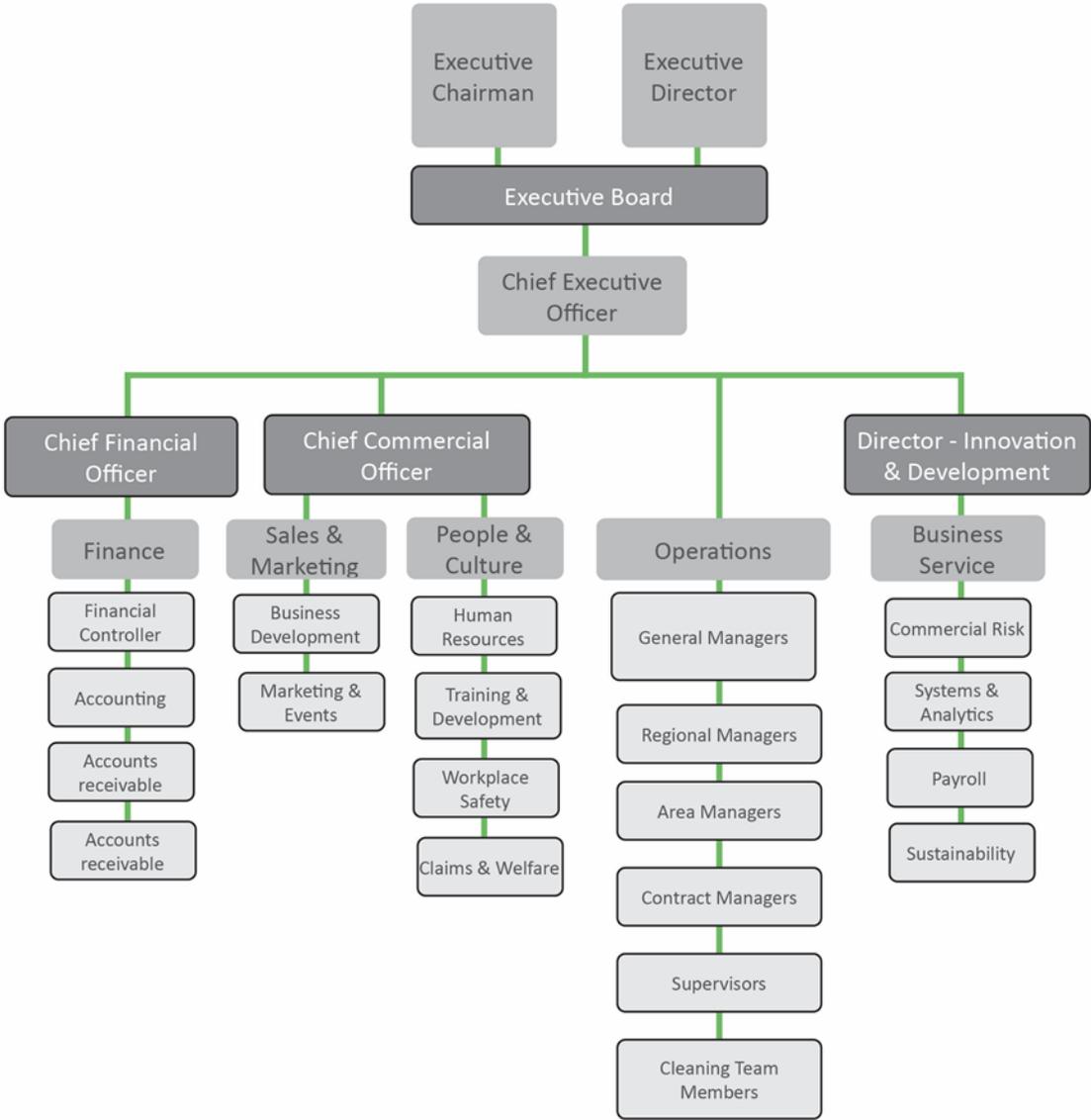
Our structure

Mandatory Criteria 1 & 2

This section addresses mandatory criteria 1 and 2 of the Modern Slavery Act 2018, pursuant to sections 16 (1)(a) and (b).

This section provides an outline of the Company’s structure, operations and supply chains during the reporting period.

Organizational Structure



Our Operations

Consolidated Property Services offers the following suite of services;

- Commercial Cleaning Services
- Waste / Recycling Management
- Environmental Consulting & Solutions
- Sanitary & Hygiene Services
- Pest Control Services
- Electrical Test & Tag Services
- Kitchen & Toilet Consumable supplies
- End of Trip Cleaning
- COVID & Infection Control Specialised cleans
- Floor Treatments & Maintenance
- Window & High Glass Cleaning
- Emergency Response Cleaning
- Specialist Cleaning & Periodicals
- Integrated Facilities Solutions
- Pressure Washing
- Laundry, Towel & Linen Services
- Escalator Cleaning
- Carpet Steam Cleaning

Consolidated operate in the following industry sectors:



COMMERCIAL CLEANING

For office cleaning requirements of all sizes and scope, we've got you covered.



EDUCATIONAL FACILITIES

We've developed EduClean, a unique system tailored specifically to service educational facilities.



RETAIL CLEANING

The retail industry relies on specialised and experienced cleaning solution partners.



INFECTION CONTROL

We can provide independently assessed Infection Control Cleaning to protect your business in the event of an outbreak.



INDUSTRIAL SERVICES

Industrial cleaning requires a comprehensive and robust cleaning solution.



SPECIAL OPERATIONS

When an emergency strikes, you need to rely on a quick and efficient solution.

Our Business

We strongly believe that part of driving a successful business is directly giving back to the community in which we operate, in a meaningful and impactful way.

Consolidated believes our CSR Policy shall provide long-term benefits to our employees, customers, partners and individuals in all communities in which we operate, with a focus on 8 key areas:

Employees

– respecting the values of employees, providing good conditions of work and equal opportunities, improving employee satisfaction through training and career opportunities

Health & Safety

– embedded in all activities and processes and the provision of a safe work environment, wherever that may be.

Environmental Impacts

– managing business development activities in order to maximize on recycling opportunities and minimize the risk of pollution, waste and nuisance to neighbours.

Sustainable Development

– long term impacts arising from the communities that the business interacts including energy efficiency of dwellings, transport, meeting social and economic needs.

Relationships with Customers

– being responsive to customer needs and providing quality assured service that intrinsically incorporates all relevant legislative considerations.

Suppliers and Partners

– treating suppliers fairly and driving CSR codes of practice throughout the goods and services supply chain.

Community Involvement

– charitable giving and engagement with local communities through funding, support and work experience programs.

Ethos

– encouraging high standards of professionalism throughout the company and promoting best practice in respect of ethical behaviour.



Our Income and Procurement

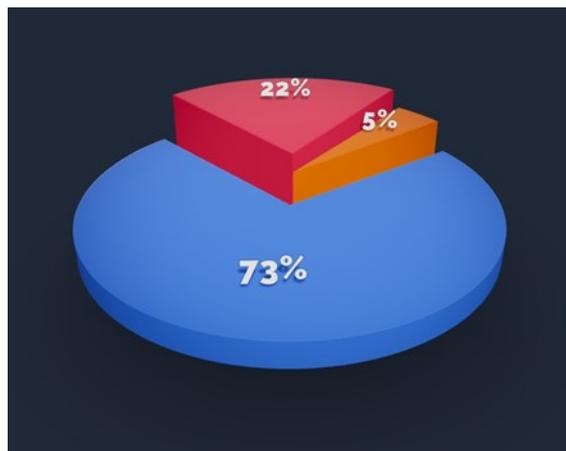


Annual Revenue—FY21
\$150 MILLION

FY21 Revenue

Breakdown by **Sector**

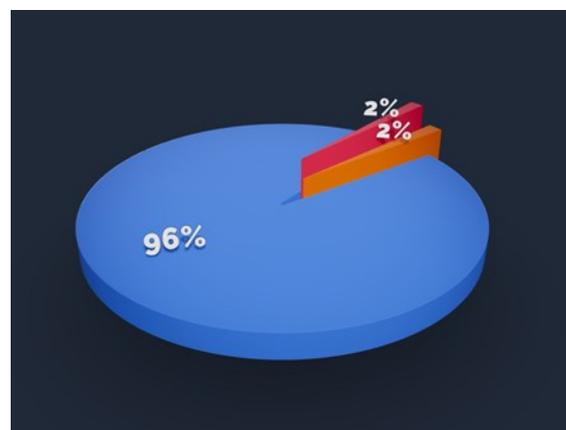
- 73% Commercial
- 22% Retail
- 5% Education



FY21 Revenue

Breakdown by **Service**

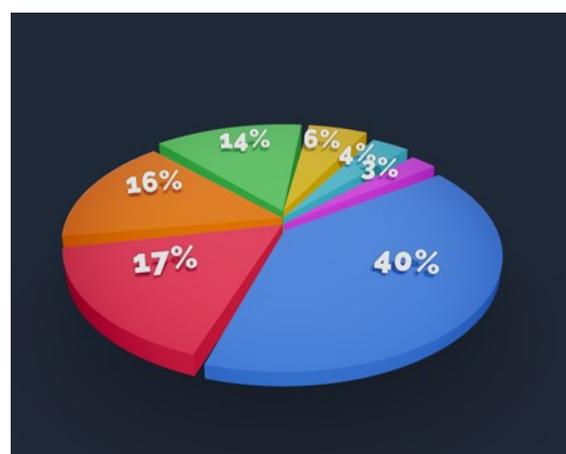
- 96% Commercial Cleaning
- 2% Rechargeables
- 2% Waste



FY21 Procurement

Spend Breakdown

- 40% Chemicals & Equipment
- 17% Rechargeables
- 16% Waste
- 14% Specialist Contractors
- 6% Consulting
- 4% IT
- 3% Communications



Our Supply Chain

Our supply chain consists of local suppliers who source their materials and products from many countries worldwide, with the majority of suppliers located in China. We maintain a great working relationship with each of our suppliers, and we continually work closely with them to ensure the environments in which our products are sourced are safe, fair, sustainable and responsible.

In addition to our supplier agreements, we manage all of our Suppliers through our Cm3 supplier portal, and utilise the 'Ethical Sourcing Questionnaire' and customised surveys via our online supplier platform for further due diligence on our supply chain to identify any modern slavery risks.

SUPPLIERS - Products	Product Type	Source Country
Cleaning Supplies	Cleaning Chemicals; Cleaning Cloths; Trolleys; Bins; Mops; Buckets; etc	Australia, China
Personal Protective Equipment	Disposable Gloves; Face masks; Eye Protection; Safety Boots; Reusable Gloves; Coveralls; Hi-Visibility vests; Hats; Hand Sanitiser	Australia, China
Uniforms	Shirts; Pants; Name badges; Jumpers; Jackets	Australia, China
Plant & Equipment	Vacuum Cleaners; Floor Scrubbing Machines; Car Park Sweepers; Robotics; Motorised Trolleys	China, Germany
Consumables	Toilet Paper; Tissues; Hand Towels; Soap	Australia, China
IT / Communication Devices	Computers; Laptops; Tablets; Telephones; Headsets; 2-way radios	China, USA
Office Supplies	Stationery; Catering; Groceries; Promotional Material	Australia, China
Vehicles	Utility vehicles; electric vehicles; ATV's	USA, Japan

SUPPLIERS - Services	Service Type <i>All service providers are Australian</i>
High Window Cleaning	Specialist window cleaners performing all window cleaning works above 2 metres
Sanitary / Sharps	Biohazard waste removal
Linen / Laundry Services	Laundry services for towels and linen
Waste Collection Services	Specialist waste collection services including (but not limited to): General waste; Comingle; Recyclables; Organics; E-waste
IT	3 rd party IT service provider
Telecommunications	Communications networks (Optus / Telstra)
Equipment Maintenance	3 rd party arrangements for the provision of onsite machine maintenance and repairs
Electrical Test and Tag	Electrical testing and tagging of all electrical equipment by 3 rd party specialist

Our Risks

Mandatory Criterion 3

This section addresses mandatory criterion 3 of the Modern Slavery Act 2018, pursuant to sections 16(1)(c).

This section describes the modern slavery risks in our operations and supply chains which were a priority during the reporting period.

Modern slavery includes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include: human trafficking, slavery and servitude.

Consolidated's risk assessment process follows the order of risk identification into then establishing the overall risk rating and the implementation of ongoing action items in order to appropriately reduce and ultimately mitigate the risk. The Risk Register is managed by our Risk Team through and is reviewed by the following stakeholders on a regular frequency:

- Risk Committee
- Executive Board
- Advisory Board

In order to continually and better understand human rights issues and the exposure we have as a business we draw on tools including (but not limited to):

Global Slavery Index

Corruptions Perception Index

Consolidated predominantly engages suppliers within it's supply chain that are Australian businesses and therefore fall within the lower risk category . In saying that, we recognize that there is risk in our lower spend sub categories such as uniform suppliers, merchan-

dise providers and some smaller consumable providers out of higher risk countries.

In order to better assess and establish the level of exposure when engaging with the lower spend contractors we have a process which ensures full transparency and commitment to ensuring adequate measure are in place at the point of engaging with any of these organisations.



CLEANING
IN PROGRESS

Our Actions

Mandatory Criterion 4

This section addresses mandatory criterion 4 of the Modern Slavery Act 2018, pursuant to sections 16(1)(d).

This section provides outlines steps taken to assess and address modern slavery risks in our operations and supply chains during the reporting period.

Cleaning has been recognised as a key risk area for modern slavery in Australia by the Department of Home Affairs. Withholding of wages, immigration-related coercion and threats, deceptive recruitment, excessive overtime, debt bondage, confiscation of personal and travel documents, and dangerous and sub-standard working conditions are all practices that are found in the cleaning industry in Australia.

- [Modern Slavery \(cleaningaccountability.org.au\)](http://Modern Slavery (cleaningaccountability.org.au))

Policies and Procedures	<p>Supplier Agreements: Continue to review and update our Supplier Agreement clauses to ensure consistency in supplier engagement and due diligence</p> <p>Reporting: Continue to evolve our framework used to identify and report suspected modern slavery cases and address complaints raised when identified</p>
Stakeholder training and capacity building around modern slavery	<p>Continue in the provision of tools and resources to staff to raise their awareness and understanding of the Company’s position on modern slavery and equip staff to take action on modern slavery issues in our supply chains. This will be achieved through ongoing refresher training to enable staff to recognise signs of modern slavery.</p>
Monitoring and Reporting	<p>Review the effectiveness of modern slavery policies and training and their implementation across the business</p> <p>Ongoing assessment of potential modern slavery risks of suppliers who have completed the Ethical Sourcing questionnaire, and reporting on actions taken for those who have responded as well as those who have not.</p>
Collaboration	<p>Continue to collaborate with industry stakeholders in the industry to address common challenges, and continue working with bodies such as Cleaning Accountability Framework (CAF) to raise standards and mitigate risks in our industry.</p>

CAF Contractor Prequalification

CAF Contractor Prequalification is a high-level systems, policies and processes assessment against the CAF Star Standards. This standard assesses compliance with the Fair Work Act 2009 (FWA), the National Employment Standards (NES) and any applicable industrial instrument e.g. Cleaning Services Award 2010 or collective agreement, tax and superannuation obligations relating to the employment of cleaners, and legislation governing the employment of migrant workers. Assessable elements aligned with domestic legislation and international standards include:

- Employment policies and procedures
- Conditions of employment
- Record keeping
- Induction and training
- Job security at change of contract
- Freedom of association

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A cleaning contractor that is CAF Prequalified can signal to existing and potential clients that the company has:

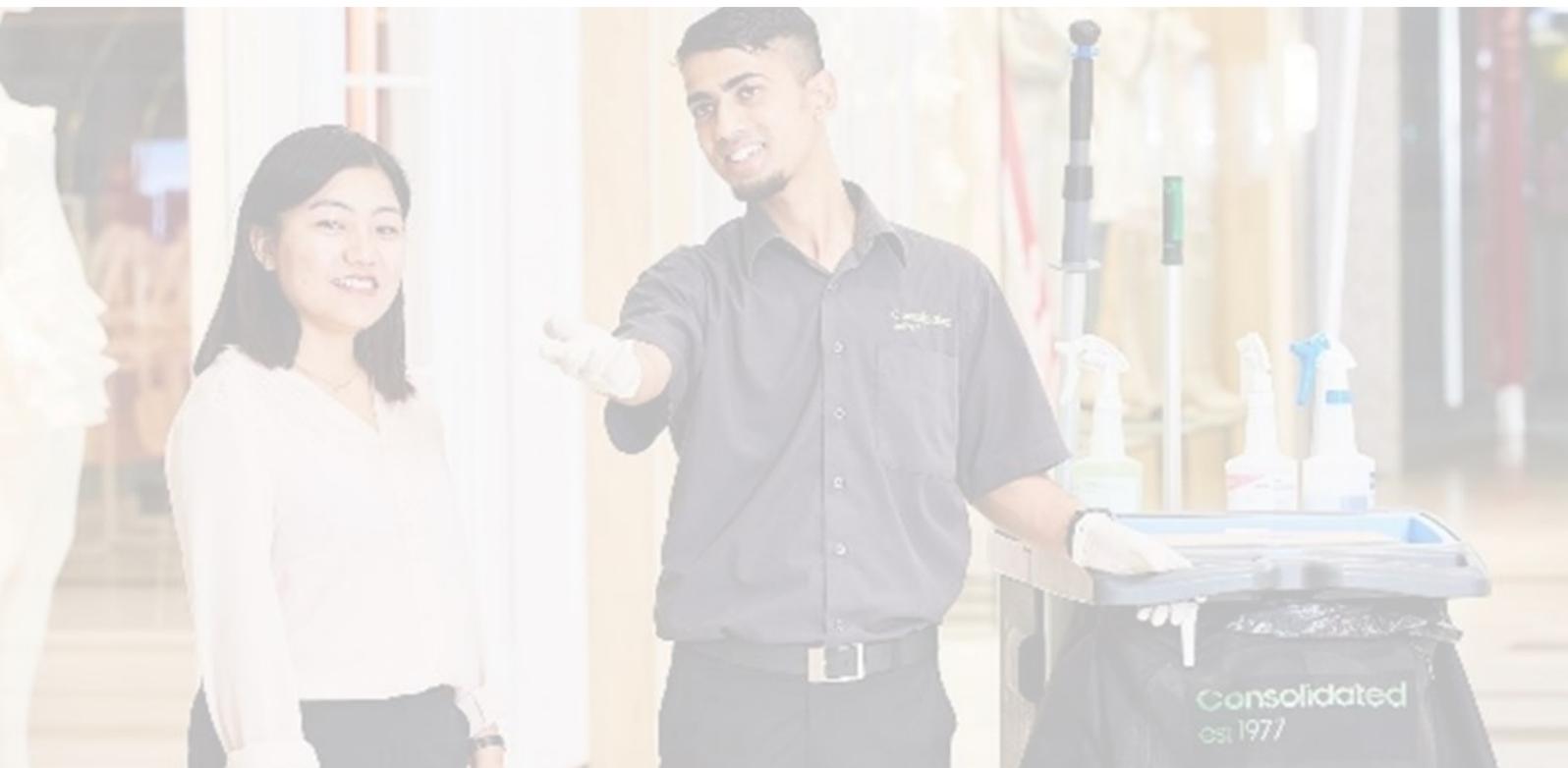
- adequate management systems in place to provide correct wages and conditions and superannuation, including appropriate record keeping systems;
- processes to educate cleaners about their workplace rights and conditions of employment policies, procedures and systems in place to provide cleaners with paid and unpaid leave entitlements;
- systems to verify and monitor visa holders’ right to work in Australia
- financial viability;
- systems for the responsible management, monitoring and enforcement of labour subcontracting;
- adequate WHS systems, policies and procedures to provide cleaners with a safe work environment;
- mechanisms in place to reduce the risk of worker exploitation, e.g. sham contracting, underpayment, modern slavery, etc., and considered ways in which it can provide cleaners with job security at a change of contract.

Supporting Information

Consolidated have embedded policies and procedures that govern the way we conduct our operations.

Policies which help support our management of potential human rights and modern slavery issues include (but not limited to):

Appropriate Workplace Behaviour Policy	Modern Slavery Policy
Business Integrity Policy	Whistleblower Policy
Code of Conduct	Work Health & Safety Policy
Equal Opportunity & Diversity Policy	Working Conditions Policy
International Student Visa Policy	



Assessing Effectiveness

Mandatory Criterion 5

This section addresses mandatory criterion 5 of the Modern Slavery Act 2018, pursuant to sections 16(1)(e).

This section provides an outline steps taken by the Company to review the effectiveness of actions to assess and address modern slavery risks during the reporting period.

Management Oversight

Modern Slavery Governance Committee

A committee comprised of cross-departmental functions of senior executives has been established to:

- Regularly check risk assessment processes to ensure they remain up to date
- Provide for regular engagement and feedback between key functions
- Oversee internal audits, supplier agreements, and results of the Ethical Sourcing Questionnaire conducted through Cm3 portal
- Tracking actions and measuring the impact of our actions
- Review the effectiveness of Consolidated's Modern Slavery controls and a form for regular engagement and feedback
- Monitor training records
- Review any feedback in relation to any potential Modern Slavery risks identified and subsequent course of action to remediate



Board Oversight

Annual reports will be provided to the Executive Board and Risk Committee in the context of Consolidated's actions to combat modern slavery in Consolidated's supply chains and to the People & Culture Committee, in the context of Consolidated's direct operations.