

Modern Slavery Statement

Commercial Property Cleaning Pty Ltd

Reporting Period: 1 July 2024 – 30 June 2025

Introduction

Commercial Property Cleaning Pty Ltd (“CPC”, “the Company”, “we”, “our” or “us”) is committed to conducting business ethically and responsibly and to preventing modern slavery and human trafficking in all aspects of our operations and supply chains.

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (“the Act”) and outlines the actions taken by CPC during the reporting period ending 30 June 2025 to identify, assess and address risks of modern slavery within our business operations and supply chains.

This statement has been approved by the Board of Commercial Property Cleaning Pty Ltd.

1. Reporting Entity

This statement is submitted by:

Commercial Property Cleaning Pty Ltd
ABN: 72 069 158 710

CPC is an Australian-owned commercial cleaning and facilities services company operating across Queensland and other Australian states and territories.

2. Structure, Operations and Supply Chains

Our Structure and Operations

Established in 1995, CPC provides commercial cleaning and related facility support services to government, commercial, industrial, educational, healthcare and high-security clients throughout Australia.

CPC employs approximately 515 employees and contractors across multiple operational regions. Our corporate office is located in Queensland, supported by operational managers, supervisors and site-based cleaning personnel throughout Australia.

Our services include:

- Commercial office cleaning
- Government and public asset cleaning
- Industrial and warehouse cleaning
- Healthcare and laboratory cleaning
- Education facility cleaning
- Disinfection and hygiene services
- Amenities and public space cleaning
- Periodic and specialist cleaning services

CPC operates under certified management systems including:

- ISO 9001 – Quality Management
- ISO 14001 – Environmental Management
- ISO 45001 – Occupational Health and Safety Management

Our Supply Chains

CPC's supply chain includes suppliers, subcontractors and service providers that support the delivery of our operations across Australia.

Our primary supply chain categories include:

- Cleaning chemicals and consumables
- Cleaning equipment and machinery
- Personal protective equipment (PPE)
- Labour hire and subcontracted cleaning services
- Uniform suppliers
- Information technology and telecommunications providers
- Fleet and vehicle suppliers
- Waste management providers
- Office and administrative suppliers

Some supply chain categories may involve elevated modern slavery risks, particularly where products are manufactured overseas or where labour-intensive services are provided through subcontracting arrangements or labour hire providers.

3. Risks of Modern Slavery Practices

CPC acknowledges that modern slavery risks may exist within both our operations and supply chains.

The areas identified as having elevated inherent risk include:

Labour and Workforce Risks

The commercial cleaning industry can present heightened risks due to:

- reliance on low-skilled labour;
- use of subcontracted or temporary labour;
- after-hours and dispersed work environments;
- culturally and linguistically diverse workforces; and
- workers on temporary or visa-based arrangements.

These factors may increase vulnerability to exploitative labour practices if not appropriately monitored and managed.

Supply Chain Risks

Potential risks may also exist within portions of our supply chain, particularly in relation to:

- imported cleaning products and equipment;
- PPE and textile manufacturing;
- outsourced manufacturing environments; and
- suppliers operating in industries or regions with elevated labour exploitation risks.

CPC recognises that these risks may include underpayment, excessive working hours, unsafe working conditions, coercion, debt bondage or other forms of labour exploitation.

At the date of this statement, CPC has not identified any confirmed instances of modern slavery within its operations or direct supply chain.

4. Actions Taken to Assess and Address Risks

CPC has implemented a range of measures to identify, assess and address modern slavery risks within our operations and supply chain.

Policies and Governance

CPC maintains policies and procedures that support ethical business conduct and workplace protections, including:

- Code of Conduct
- Equal Opportunity Policy
- Anti-Bullying and Harassment Policy
- Recruitment and Employment Procedures
- Workplace Health and Safety Policies
- Grievance and Incident Reporting Procedures

These policies establish expectations relating to lawful employment practices, fair treatment, workplace conduct and ethical supplier relationships.

Recruitment and Employment Practices

CPC undertakes employment verification and onboarding processes designed to ensure compliance with Australian workplace laws and ethical employment standards.

These processes include:

- verification of work rights;
- award compliance and payroll controls;
- employee inductions;
- workplace training; and
- supervision and management oversight.

CPC is committed to ensuring employees are paid correctly in accordance with applicable industrial instruments and legislation.

Supplier and Subcontractor Management

CPC seeks to engage suppliers and subcontractors that align with our ethical standards and expectations.

Measures implemented include:

- supplier and subcontractor reviews during onboarding;
- contractual obligations requiring compliance with applicable laws and ethical standards;
- ongoing monitoring of supplier relationships; and
- engagement with suppliers where concerns or risks are identified.

Training and Awareness

CPC provides training and awareness programs for employees and operational personnel covering:

- workplace rights and responsibilities;
- ethical conduct expectations;
- reporting procedures; and
- awareness of modern slavery indicators and risks.

Auditing and Monitoring

CPC undertakes regular internal reviews and third-party audits relating to operational compliance, workplace standards and management systems.

These reviews support the identification of potential risks and opportunities for continuous improvement.

5. Assessing the Effectiveness of Our Actions

CPC assesses the effectiveness of its modern slavery risk management measures through ongoing monitoring, review and continuous improvement processes.

The effectiveness of our actions is assessed through:

- periodic reviews of company policies and procedures;
- monitoring supplier and subcontractor compliance;
- review of workplace incidents, complaints and grievance reports;
- audit outcomes and corrective action processes;
- employee training participation and completion rates;
- operational management reviews; and
- ongoing assessment of workforce and supply chain risks.

Where gaps, concerns or non-compliance issues are identified, CPC implements corrective actions and reviews outcomes to improve operational controls and risk mitigation measures.

CPC remains committed to strengthening its modern slavery framework and continuously improving its risk management practices over time.

6. Consultation Process

In preparing this Modern Slavery Statement, CPC consulted with relevant internal stakeholders across the business, including senior management, operational managers, human resources personnel and procurement representatives.

Where applicable, consultation also occurred with entities owned or controlled by CPC to ensure alignment in identifying modern slavery risks and implementing consistent risk management practices across operations and supply chains.

Feedback obtained through this consultation process was incorporated into the preparation, review and approval of this statement.

7. Other Relevant Information

CPC is committed to fostering a culture of ethical conduct, accountability and continuous improvement throughout its operations.

As part of this commitment, CPC will continue to:

- strengthen supplier engagement processes;
- improve risk assessment methodologies;
- enhance staff awareness and training;
- review procurement practices; and
- monitor developments relating to modern slavery legislation and best practice guidance.

CPC acknowledges that addressing modern slavery risks requires ongoing vigilance and collaboration across industry and supply chains.

Approval

This statement was approved by the Board of Commercial Property Cleaning Pty Ltd on 26 June 2025 in accordance with section 13 of the Modern Slavery Act 2018 (Cth).



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