

Modern Slavery Statement 2022





Introduction

This is our third Modern Slavery Statement (Statement) published for the purpose of reporting under the Australian Modern Slavery Act 2018 (Cth).

Our Statement outlines the ongoing actions taken by B.I.C. Services Pty. Limited (BIC) during the financial year ending 30 June 2022 (FY22) to minimise the risk of modern slavery in our operations and supply chain.

For completeness, where our approach to modern slavery, business structure, operations and supply chain have remained the same over the reporting period, we have restated the same information as that laid out in our previous Statements. We have also included references to initiatives undertaken in the previous reporting period for historical context and added any notable progress achieved post FY22, and prior to publishing this Statement for currency.

We welcome your feedback and any queries you may have on our Modern Slavery Statement and Framework.

B.I.C. Services Pty. Limited
12 Rothesay Avenue, Ryde NSW 2112
T. 1800 683 863
W. bic-services.com.au

CEO's Foreword	3
How We Create Value	6
Our Structure, Operations and Supply Chain	7
Identifying Our Modern Slavery Risks	11
Our Actions	15
Assessing Effectiveness	27
The Way Forward	28
Modern Slavery Statement Annexure	31

Acknowledgement

BIC Services 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 their Elders past, present and emerging, and extend that respect to other Aboriginal and Torres Strait Islander people.

CEO's Foreword



Whilst the COVID-19 pandemic has continued to impact people around the world, BIC has remained focused and committed to working with its value chain to increase awareness on the risks of modern slavery and to jointly work on strategies to mitigate these risks.

BIC also continues to be guided by its Core Values and Unique Selling Points and is driven to maintain its leadership role within the cleaning industry.

In 2022, BIC was acquired by Bidvest Group Limited (Bidvest), a South African services, trading, and distribution company. Bidvest has aligned values and a determination to eradicate modern slavery. At BIC we welcome the opportunity to engage with other associated businesses in the Bidvest group and learn from one another about strategies to combat modern slavery wherever it occurs.

We recognise that human rights and modern slavery are critical and challenging issues that impact vulnerable people. As a business with a turnover approaching A\$150 million at year end and employing over 2,500 people, we have the size, passion and commitment to make a real difference to both our customers and community. This means we can make a genuine and lasting positive impact not only in our direct operations, but in our role as a service provider to our customers, and in our supply chain as well. We have zero tolerance for slavery, human trafficking, child labour and any abuse of human rights. We will do whatever is in our power to ensure that all people have the right to make free choices and to live with dignity and freedom.

As a signatory to the United Nation's Global Compact (UNGC), BIC released its first Communication on Progress in early 2022 on embedding the UNGC's Ten Principles around

Human Rights, Labour, the Environment and Anti-Corruption. We are continually reviewing and improving our practices and are committed to playing a leading role in supporting and driving the global effort to eradicate slavery and human rights abuse.

Whilst we have not identified any specific instances of modern slavery, our Modern Slavery Framework (MSF) will continue to guide our actions against modern slavery and ensure a comprehensive approach across the BIC business.

This 2022 statement shares our initiatives, actions and ongoing review of policies and procedures to support our modern slavery framework. Collaboration with our stakeholders has been pivotal to our response and to ensure our approach is robust and effective.

Tony Gorgovski,
Chief Executive Officer

Safety

Strive continuously to improve the safety of all employees and customers.

Respect

We believe respect for each other will guide us in all our decisions.

Team Work

Together everyone achieves more and is key to our success.

Commitment to Employees

We strive to achieve a harmonious workplace and higher incomes.

Honesty

We believe honesty is at the forefront of our working relationships.

Customer Focus

Exceed our clients expectations and deliver quality.

Our Core Values

“

At BIC we welcome the opportunity to engage with other associated businesses in the Bidvest group and learn from one another about strategies to combat modern slavery wherever it occurs.

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”

Tony Gorgovski, Chief Executive Officer

Our Modern Slavery Action Highlights



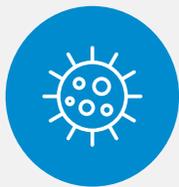
Launch of BIC Connect

Our Intranet to increase engagement with our people, including on matters related to modern slavery.



Modern Slavery Training

Growing the awareness and understanding of our management team in matters related to modern slavery.



Ongoing Covid-19 Focus

In FY22 we continued to take special precautions to mitigate the risks of COVID-19 for our people, customers and supply chain.



Becoming a Fellow of the Supply Chain Sustainability School

Supporting education to increase collaboration with like-minded organisations.



Supplier Audits and a New Ethical Sourcing Model

Building trust and transparency across our supply chain.



National Online Onboarding Program Launched

Empowering the BIC Training Academy of Excellence and increasing the awareness of modern slavery for all our employees.



Collaboration with Clients

Audits of our operations and responses to modern slavery.



National Roadshows

Face-to-face dialogue with employees and clients – to increase awareness and understanding of the role and responsibility we all have in identifying and eradicating modern slavery.

How We Create Value

We see our employees as family, and the communities in which we operate as an extension of that family. We believe in a healthy and prosperous future for all, and this drives our purpose to provide smart solutions for healthy communities. To achieve this, we must continue to meet our responsibilities to our people, our planet, and our stakeholders.

OUR PURPOSE

Smart solutions for healthy communities

WHO WE ARE

We provide a full range of cleaning solutions including, maintenance, hygiene and waste management services for commercial, industrial, education, aged-care, health and public places across Australia.

VALUES

- Safety
- Respect
- Customer focus
- Team work
- Honesty
- Commitment to employees

OUR MATERIAL ISSUES

- Increasing customer satisfaction through innovative solutions
- Protecting and promoting human rights in our business and industry
- Collaborating with clients and their tenants to improve sustainability outcomes
- Managing uncertainty in our supply chain
- Producing useful, actionable information through transparent reporting

OUR INPUTS

- People
- Investment
- Research & Development
- Education & Training
- Supply chain

OUR STRATEGIC PILLARS

OUR PEOPLE

We look after our people and our people look after our clients

What this delivers

A safe, diverse and engaged workforce built on a direct employment model, fair payment and treatment, rigid health and safety standards, a standardised and consistent approach, the non-negotiable use of environmentally safe products and continuous education and training delivered through our Training Academy.



INNOVATION

We invest in innovation to continually improve our service delivery

What this delivers

A data-rich solution that uses sensors, tracking beacons, tablets, smart devices and mobile apps to monitor and report -- in real time -- workforce movement, service delivery and tenant requests and feedback.



SUSTAINABILITY

We partner with our clients to create sustainable ways of working

What this delivers

Mutually beneficial partnerships with our clients through customer-focused solutions for their cleaning requirements, investment in workforce training, positive relationships with tenants, and our data-driven technological innovations that improve efficiency, reduce environmental impacts and help them respond to sustainability disclosures.



TRANSPARENCY

We carry out all business operations with complete transparency

What this delivers

A trusted and reputable national brand based on carefully considered policies and processes, a well-audited supply chain, expertise in environmental management and transparent disclosure and reporting.



OUTPUTS

- Employ over 2,554 staff
- Work over 551,000 shifts
- Clean over 6 million sqm of office space
- Clean over 1,800 client sites at 1,120 locations

OUR STAKEHOLDERS

- Our people
- Property owners, managers & tenants
- Suppliers
- Unions
- Industry
- Government
- Research & Development
- Suppliers
- Products & Packaging
- Marketing & Sales
- Property owners, managers & tenants
- Waste management

OUR VALUE CHAIN

- Research & Development
- Suppliers
- Products & Packaging
- Marketing & Sales
- Property owners, managers & tenants
- Waste management



Our Structure, Operations and Supply Chain

About BIC Services

BIC Services is a leading provider of integrated cleaning services in Australia and has been operating since 1989.

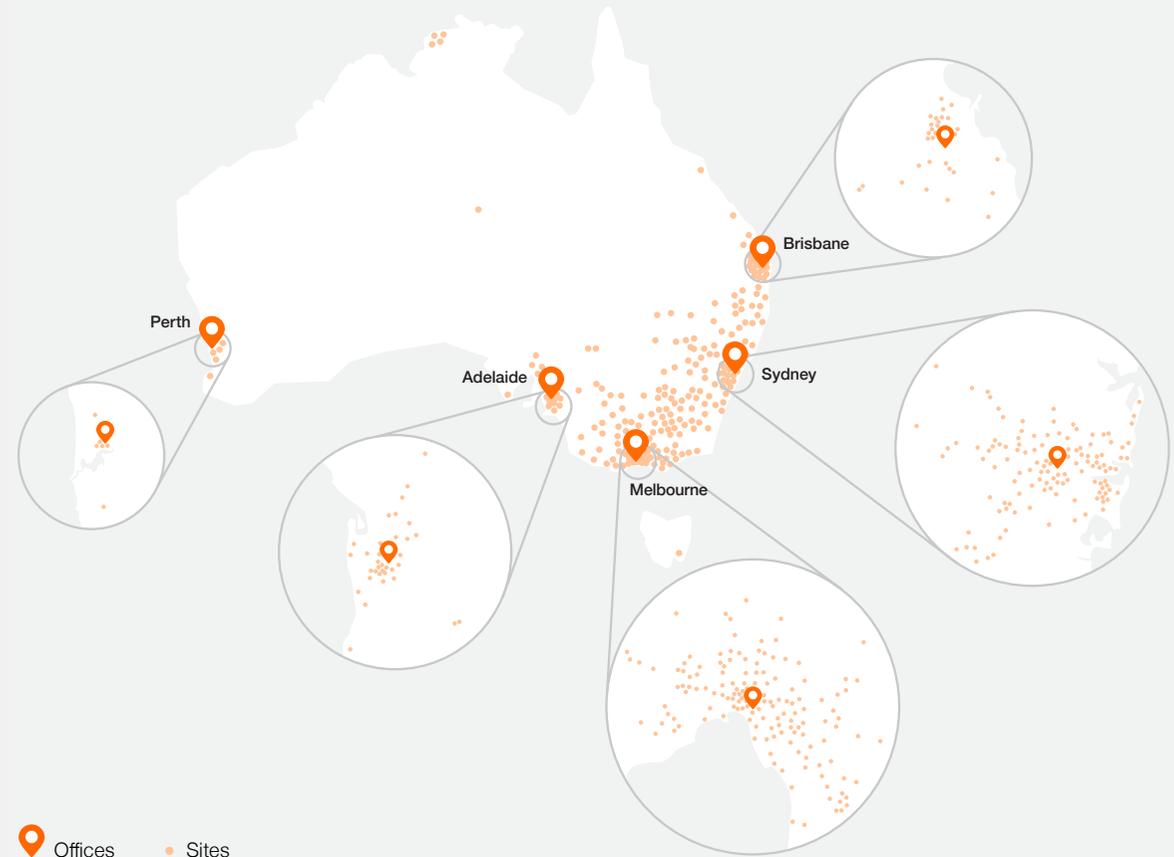
We specialise in cleaning, hygiene, and maintenance services, along with waste management and replacement of consumables across commercial, educational, industrial, aged-care, health care and transport, as well as community precincts and open spaces.

On 7 July 2022, BIC was acquired by Bidvest Group Limited. Founded in 1988 and listed on the Johannesburg Stock Exchange in 1990, Bidvest is a leading South African industrial group with over 250 individual businesses and employs over 125,000 people in South Africa, the United Kingdom, Ireland, Spain and Australia.

BIC has five state-based offices, and we directly employ over 2,500 people working across more than 1,800 client assets across Australia. Our people come from culturally diverse backgrounds, with more than 77 nationalities making up more than 94% of our staff. We value our people, and we know our success as a business depends on attracting the best staff available, therefore we constantly strive to make our recruitment practices fair, efficient and effective.

This means leveraging our ability to attract people by word-of-mouth through existing staff, advertising for qualified people, or using the services of recruitment agencies where necessary. In every instance in the recruitment process, including training and induction, we apply the principles ingrained in our Modern Slavery Framework.

Our Locations



2,554
employees



5
state offices



1,800+
client sites

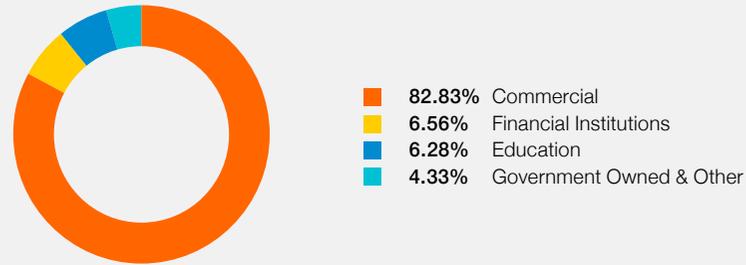
Revenue and Procurement Snapshot

BIC uses a range of suppliers for the provision of cleaning materials and chemicals, equipment, uniforms, and engage specialists for the provision of high-rise window cleaning, hygiene, and waste removal.

In FY22, our supplier spend was A\$5.17 million, and our five largest clients accounted for more than 80% of this spend.



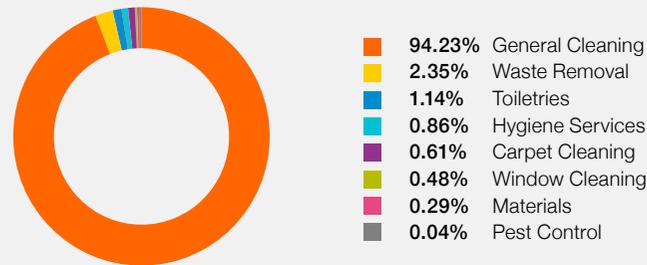
FY22 Revenue by Client Sector



\$137 million+

Annual revenue in FY22

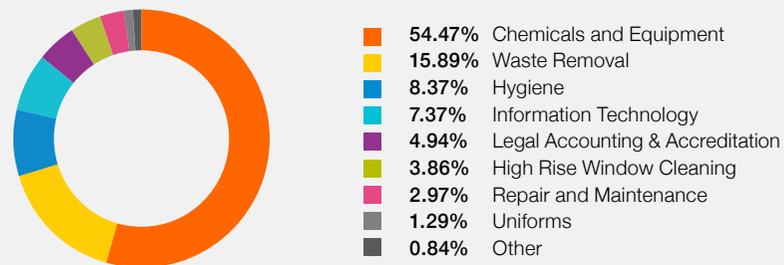
FY22 Revenue Streams



\$5.17 million

Supplier spend in FY22

FY22 Procurement Categories

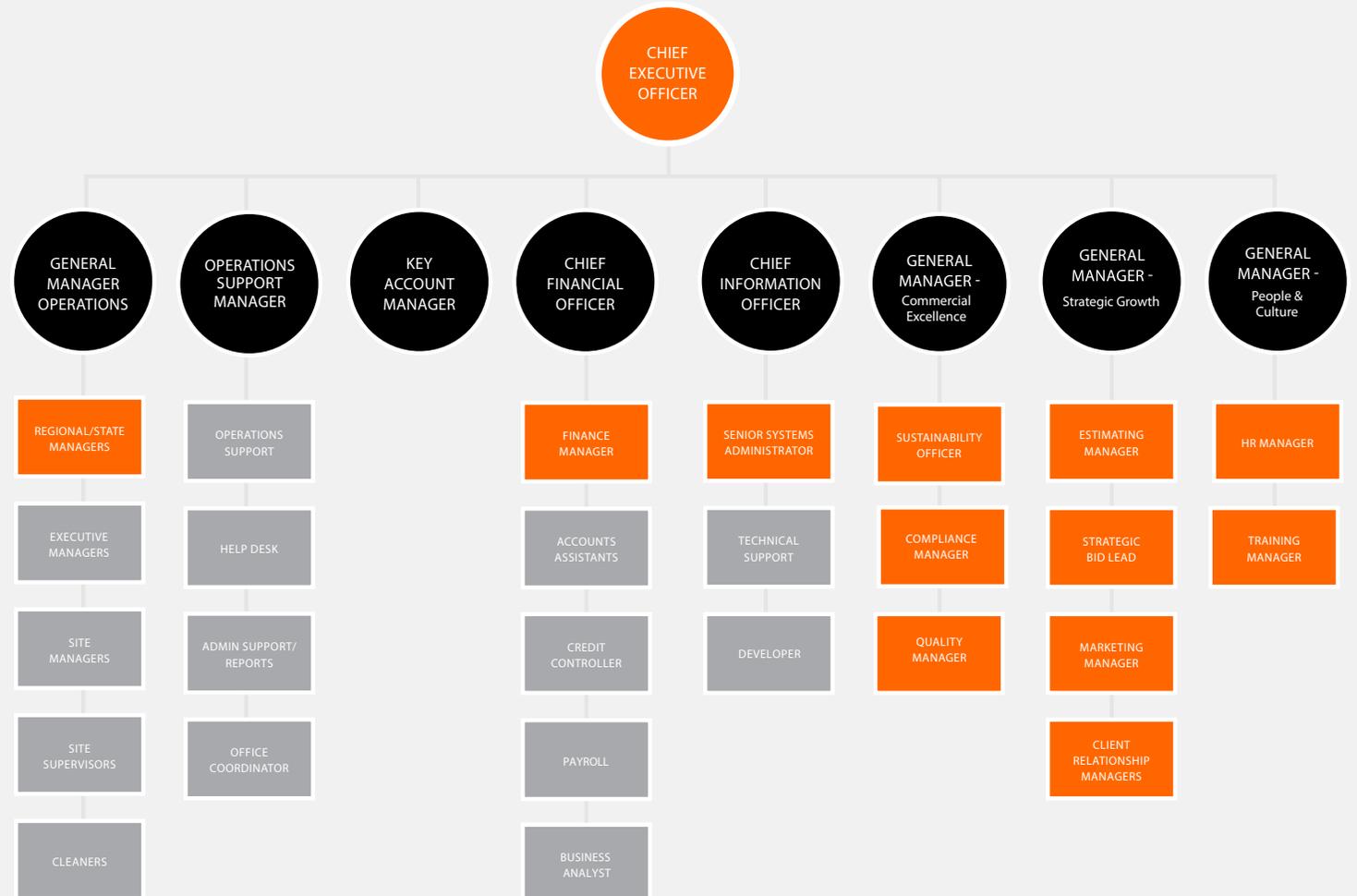


80%

of spend accounted for from our five largest clients

Organisational Structure

With over 1,800 client sites across Australia, BIC have developed a corporate structure that reflects management at a national, state, regional and site level to ensure the quality and continuity of service to our clients.



At BIC we have embraced the opportunity to exemplify an ethical approach in what has been identified as a high-risk industry for modern slavery.

This benefits our people, our clients and their tenants, and the health and reputation of our business and industry.

Identifying Our Modern Slavery Risks

Recognising the Risks

The behaviours and practices which constitute modern slavery are serious human rights violations. Modern slavery practices include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

Modern slavery risks identified in the cleaning industry include breaches of workplace laws, fraudulent subcontracting arrangements, below minimum cash wage payments, and poor job security. At BIC we have embraced the opportunity to exemplify an ethical approach in what has been identified as a high-risk industry for modern slavery. This benefits our people, our clients and their tenants, and the health and reputation of our business and industry.

In our operations

Despite the risks in the broader industry, BIC has identified the residual risk of modern slavery in our operations as low. This is due partly to the robust safeguards we have implemented and to the decisions we have made about the structure and nature of our business.

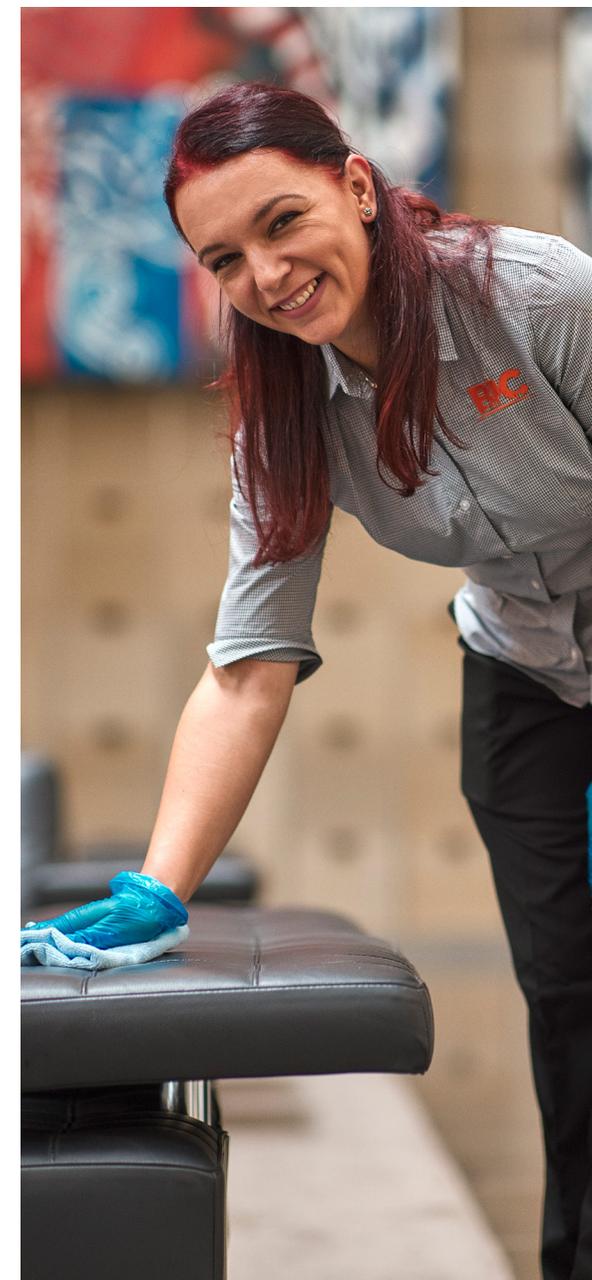
We favour a direct employment model rather than subcontracting. This provides us with unobstructed oversight of our cleaning teams and gives our workers access to our internal safeguards against unfair work practices.

Our supervisory network (consisting of our CEO, GM – Operations, Regional/ State Managers, Executive Managers and Cleaning Supervisors) are committed to delivering multiple levels of support and ongoing monitoring of our on-site personnel.

All of our direct workforce reside in Australia, are entitled to Australian work rights and any visas are vetted by the Department of Immigration. This ensures compliance with legislation and best practice to safeguard the interests of employees, prospective employees and others working for BIC.

At induction, all new staff are issued with comprehensive information covering BIC's ethical standards and expectations, human rights related policies, Fair Work Ombudsman Information, National Employment Standards, Visa Holders and Migrant Workers workplace rights, entitlements and access to Tip-Offs a 3rd party international whistleblower hotline managed by Deloitte.

BIC has long been an industry leader in driving change across the cleaning industry to help provide fair and equitable incomes to our cleaners. We developed our Project Equity program to negotiate above-industry wage rates for employees in partnership with like-minded clients.



Suppliers and Contractors

BIC uses a select range of suppliers for the provision of cleaning chemicals, equipment, uniforms, and specialists in the areas of high-rise window cleaning, hygiene services and waste removal.

While we have aimed to minimise the number of suppliers we engage, we have inadvertently increased the number of suppliers over the past couple of years, partly due the impacts of COVID-19 on our supply chain and to strengthen availability of required supplies and ensure undue demand is not put on individual suppliers.

At the same time our preference is to engage Australian based and Indigenous suppliers in line with our Reconciliation Action Plan commitments and we favour suppliers whose modern slavery and human rights policies and practices are aligned with our own.

The sourcing and provision of our uniforms and cleaning chemicals were identified as high-risk factors due to the upstream import of products from overseas. Fifteen suppliers and contractors across a range of products and services, and incorporating these high-risk areas, were included in audits we conducted in FY22.

We continue to review and improve our approach to supply chain risk assessment and are committed to working collaboratively with our suppliers to identify and mitigate the potential of modern slavery in their businesses and in that of their sub-suppliers.

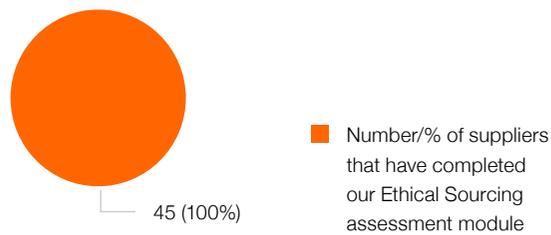
Following the in-depth review of our supply chain in 2019, BIC continues to use the Cm3 Contractor Management Platform to help profile, manage and prequalify our supply chain. Suppliers onboarded and prequalified through our Cm3 supplier portal are now required to complete the Cm3 Ethical Sourcing Module. This module has superseded our modern slavery survey and enhanced our effectiveness in identifying potential risks and prioritising our supplier engagements where there are areas of greatest risk. Since October 2022, all BIC suppliers and contractors must also sign and adhere to our Bidvest Code of Ethical Procurement.



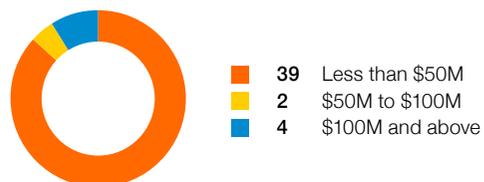
Our Ethical Sourcing Module

Our Ethical Sourcing Module is enhancing our effectiveness in identifying potential risks and enabling us to prioritise and tailor further supplier engagement where there are areas of greatest risk.

Ethical Sourcing Risk Profile



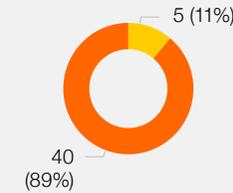
Supplier Breakdown by Annual Revenue



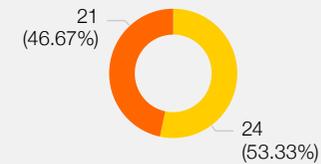
Tier 1 Suppliers 45

No
Yes

Overseas Supply



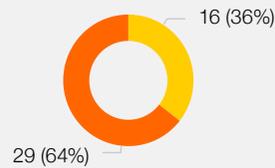
At Risk Industries



Overseas Workforce



Vulnerable Workforce



Legal Breaches



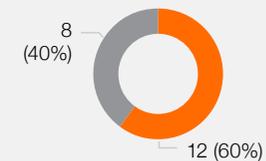
Tier 2 Suppliers 20 engage subcontractors

No
Don't know

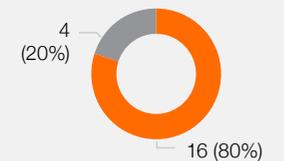
Overseas Supply



Overseas Workforce

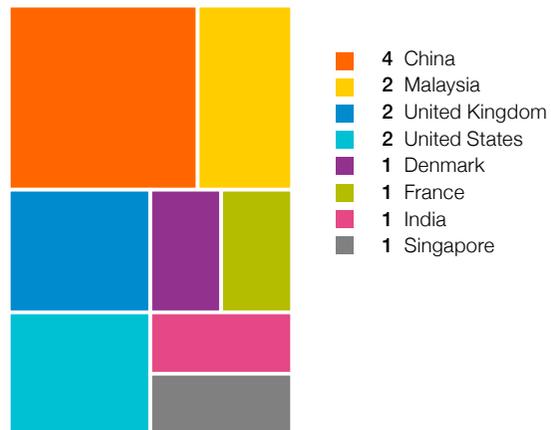


Legal Breaches

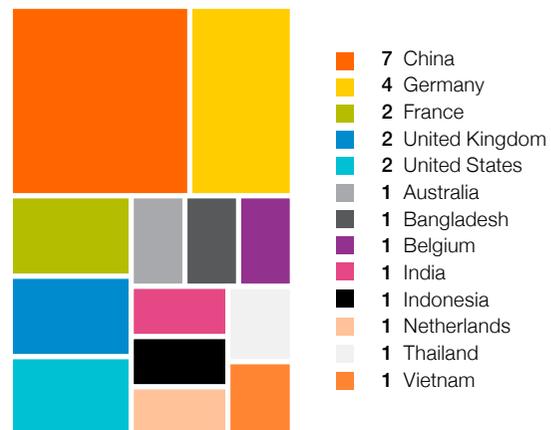


Our Ethical Sourcing Module

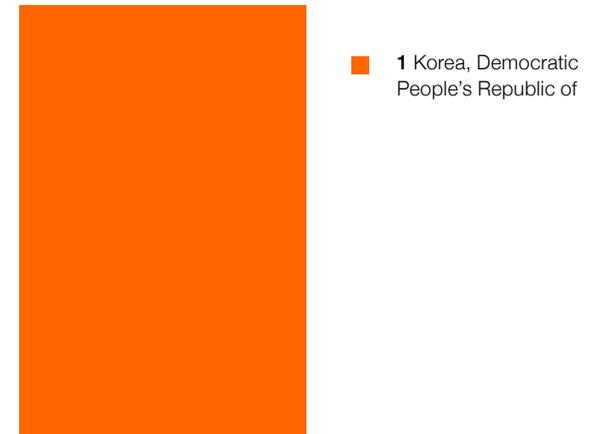
Tier 1 Overseas Supply



Tier 2 with Overseas Supply



Tier 2 Overseas Workforce



Our Actions

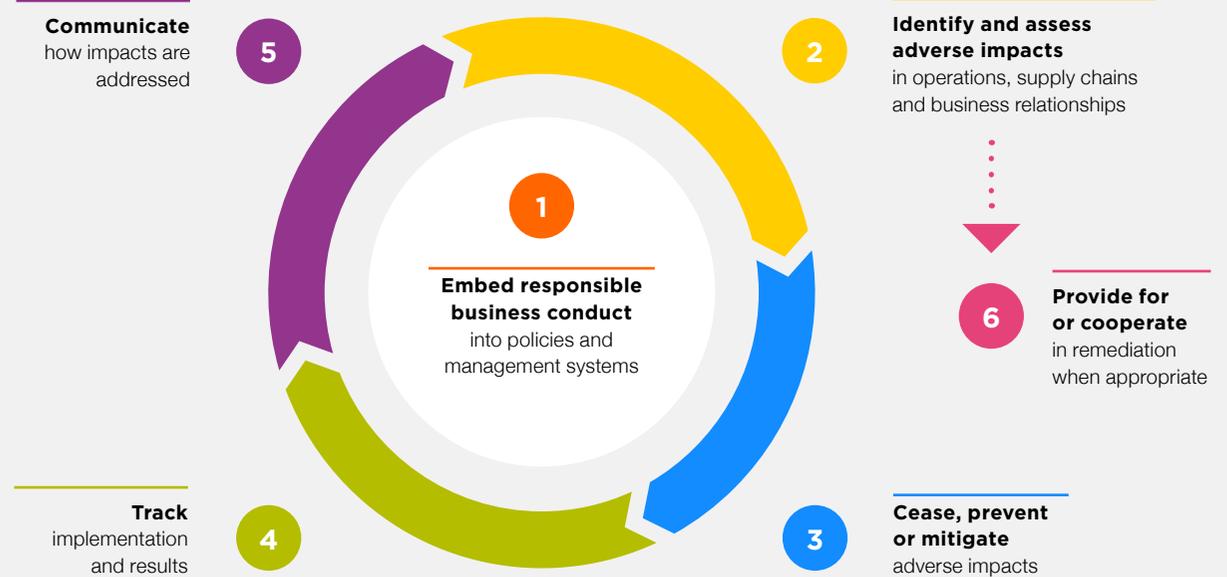
BIC understands the significant role it plays in taking a precautionary approach and driving positive change to ensure our supply chain and operations are protected from modern slavery practices.

Actions taken during the FY22 reporting period reflect BIC's commitment to continuous improvement in our response to addressing modern slavery risks. Our approach aligns with the OECD Due Diligence Process and Supporting Measures Guidance¹ for responsible business conduct which also addresses expectations of the UN Guiding Principles on Business and Human Rights and the ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy.

We strongly believe a comprehensive, all-business response is necessary to address modern slavery.

We have established appropriate governance arrangements to give effect to our Modern Slavery Framework to implement and ensure safeguards across all aspects of the business.

Due Diligence Process and Supporting Measures



1. [Flyer-RBC-Due-Diligence.pdf \(oecd.org\)](#)

Our Governance of Modern Slavery

Our Policies

BIC has a strong set of policies to support human rights in our operations and supply chain, in accordance with the International Bill of Human Rights and as a Signatory to the United Nations Global Compact (UNGC). We are committed to implementing the UNGC's Ten Principles on human rights, labour, environment, and anti-corruption.

We require our employees and direct suppliers to comply with all applicable laws and regulations and with our [Human Rights Policy](#), our Modern Slavery Framework (see page 28–30) and our [Employee Code of Conduct](#).

Suppliers are expected to maintain fundamental human rights standards and adopt similar policies in their own businesses and most recently are required to sign Bidvest's² Code of Ethical Purchasing.

In FY22 BIC conducted a review of all policies and procedures to ensure that these were consistent and effective in responding to the Act. We are also improving our systems through our ISO certified Integrated Management System to ensure the principles of BIC's Human Rights Policy are faithfully enacted across the business.

Modern Slavery Steering Committee

In November 2019, in recognition of the need for an all-of-business response to the problem, we established a Modern Slavery Steering Committee to review, evaluate and measure compliance and drive improvements in our operating procedures and in our supply chain.

The committee was made up of members of the leadership team, including our CEO, GM – Commercial Excellence, GM – People & Culture, GM – Sustainability and Procurement, GM – Operations and our Compliance Manager. The committee has been responsible for reviewing and revising our Modern Slavery Framework where necessary. This includes analysing the effectiveness of the current framework, incorporating learnings, and addressing challenges.

Currently and into the future, we will have a Modern Slavery Working Group responsible for the day-to-day implementation of our framework and driving continuous improvement initiatives. This will be led by our GM – Commercial Excellence and involve our GM – People and Culture and Compliance Manager in quarterly reviews and call upon other relevant internal and external stakeholders as required to progress BIC's approach.

The GM – Commercial Excellence will subsequently update the Executive Team at their regular Executive Team meetings for feedback and any required endorsements.

Modern Slavery Framework

Our Modern Slavery Framework (MSF) guides our actions and ensures a comprehensive all-of-business response to the issue of modern slavery. BIC understands that we can demonstrate a true commitment to tackling modern slavery by achieving the targets we set within our framework, and through transparent reporting on those actions.

We have already made significant progress. The following sections illustrate the action we've taken to date and, where relevant, indicate future steps to be taken. Our full MSF is available on (see page 28–30).



². Our parent company as of 7 July 2022

BIC understands that we can demonstrate a true commitment to tackling modern slavery by achieving the targets we set within our framework, and through transparent reporting on those actions.

Growing Awareness and Capability

During the reporting period, BIC has been proactively engaging and encouraging all to remain vigilant and speak up on potential human rights issues. Our intention is to send a clear message that BIC will not tolerate any form of exploitation in our business or supply chain, nor the wider industry.

As part of our responsibility to combat modern slavery we ensure that employees, clients, suppliers and other stakeholders are aware of our commitments. We do this through all available channels, including our newsletters, blogs and LinkedIn, as well as our CEO updates, presentations and InClean magazine [articles](#).

In May – June 2022 we held face-to-face lunch and learn sessions with employees and client representatives on our Environmental, Social and Governance Framework. This included dialogue specifically on modern slavery – discussing BIC’s commitment and actions, potential indicators of people at risk, and what to do and who to contact if you have a concern.

In August 2022 we also rolled out posters on-site to alert frontline employees of potential indicators of victims of modern slavery and the available avenues to report a concern, including an anonymous third-party channel and emphasising if they suspect someone is in immediate danger to call 000 first.



SPOT THE SIGNS OF MODERN SLAVERY

If you think you may have encountered a victim of modern slavery, or some of these signs apply to you, get in touch and provide as much information as possible.

<p>WORK</p> <ul style="list-style-type: none"> • Forced to work • Excessively long shifts • No payslip 	<p>WELLBEING</p> <ul style="list-style-type: none"> • Threats to the person or their family • In fear of someone • Isolated from others • Signs of abuse/mistreatment
<p>MONEY</p> <ul style="list-style-type: none"> • Little or no pay for work • Money controlled by someone else • Money owed to someone else 	<p>ID AND DOCUMENTS</p> <ul style="list-style-type: none"> • No Passport or visa • ID taken by someone else • Fake ID given
<p>TRAVEL</p> <ul style="list-style-type: none"> • Transported to and from work • Travel to Australia paid and organised by someone else 	

To report a concern:

- Call (24/7): 1800 633 293
- Use our QR code
- Visit: tip-offs.com



IF YOU HAVE REASON TO BELIEVE A PERSON IS IN IMMEDIATE DANGER, CALL 000 FIRST (AUSTRALIA).

Case Study**Working with Our People****EMPOWERING OUR PEOPLE TO RECOGNISE THE SIGNS OF MODERN SLAVERY**

At busy Darling Park in the CBD of Sydney, Executive Manager Bijendra Shrestha has about a hundred BIC staff members working in different roles, from cleaning workspaces, providing porter services to replenishing supplies throughout the iconic office precinct. Bijendra completed BIC's self-paced modern slavery training modules in 2020.

"The training helped me to know what to look for," Bijendra commented. "Before I completed the course, I didn't know what was classed as modern slavery. Now I do and also what to do if I come across anything like it."

As Executive Manager in charge of BIC's operations at Darling Park, Bijendra is a good example of one of BIC's critical front-line people. He works with three supervisors, who in turn work with the largely part-time staff who complete their shifts mostly during the evenings.

"We have staff from many different backgrounds too, like Thailand, Nepal, India, Croatia and Macedonia," he said.

Bijendra reports that he and his supervisors often take the opportunity to engage with their workforce and make it clear that they are available to speak confidentially about any matter that might be impacting their safety, health and wellbeing – including any issues around modern slavery.

**BEING VIGILANT**

Through training and during regular 'lunch and learn' sessions, BIC impresses on its managers and supervisors how important it is to watch for any signs of modern slavery. If anything is suspected, they have the ability to report it to BIC's Compliance Manager, who will consult with them and other managers, before taking any action deemed necessary. Staff also have access to 'Tip-Offs', a 3rd party international 24-hour hotline managed by Deloitte, where they can call anonymously and again; management will consult internally before deciding to take the matter forward.

"Our people are a key pillar of our business," GM – Commercial Excellence, Mark Gerdovic said, summing up

BIC's approach to modern slavery training. "The training aligns with a strong set of policies we have to support human rights in our operations and supply chain."

At BIC awareness is kept top of mind during face-to-face meetings with both clients and staff each year. Knowledge about modern slavery and its risks is a key topic and like Bijendra, managers and supervisors across all of BIC's operations are updated regularly on its risks and what to do about it.

Third Party Modern Slavery Audits of BIC Services

Client Audits

A number of our clients requested BIC's participation in third-party risk audits focused on our ethical sourcing and modern slavery response. Aspects covered in the audits include governance, policies and practices, recruitment, training, systems and reporting, communications, industrial relations, and supplier management, among other topics.

BIC will continue to support our clients and actively participate in these audits to ensure transparent and ethical supply chains and welcome any insights and learnings from the process.

BIC is passionately committed to aligning with and driving industry best practice in responding to Australian modern slavery legislation. We have proven the readiness of our business policies, practices, and systems to assure our workers' rights and safeguard against the risk of labour and human rights abuses.

Recent client audits conducted by subject matter experts determined our company has:

- Adequate policies, procedures, and management systems in place to provide cleaners with relevant entitlements including correct wages, conditions and superannuation, and appropriate record keeping systems
- Processes to inform cleaners of their workplace rights, including freedom of association and to raise grievances
- Financial viability of our business
- Adequate WHS systems, policies, and procedures to provide cleaners with a safe work environment
- Adequate cleaner onboarding and training procedures
- Mechanisms in place to reduce the risk of worker exploitation, including sham contracting, underpayment, and all forms of modern slavery.



The Impact of Covid-19

The COVID-19 pandemic established cleaners as frontline workers and the cleaning industry, an essential service.

However multiple lockdowns and clients' building occupants shifting to working from home arrangements put added pressure on the industry to look after its worker's job security, health and wellbeing. It also placed extra challenges on workers to maintain essential supplies and services that all of us in the community were all reliant upon, and it became evident that a flow-on effect of these changed conditions could be the heightened risk of modern slavery for workers, in our industry and in our supply chain.

BIC's Response to COVID-19

As we have a direct employment model and only operate in Australia, we have solid controls in place to ensure our people are not at increased risk of modern slavery due to the pandemic. But we made a conscious decision to be ahead of the curve in our response, beginning with informing and preparing our people and we worked closely with our clients and suppliers to ensure we supported and informed them of any required changes to operations.

Increased Cleaning Scope

As an enhancement of our normal operations, we implemented 'refresher' and 'high-touch point cleans' for our clients during the day. Our cleaners being visible on site during the day provided reassurance to our clients, and their tenants and visitors, that we were there to look after their health and safety.

We wrote the first pandemic cleaning scope in Australia, and tailored site-specific return to work programs for our clients to ensure their tenants felt secure when reoccupying their buildings.

Our Pandemic Action Committee

Set up in 2020, the committee continued to meet weekly throughout FY22 to help us remain agile and responsive to the rapidly changing realities we all face. Being a national company, we had the complex challenges of the lack of harmony between states around rules and restrictions, compounded with increased confusion as specific local government areas became hotspots.

We faced the real impacts of our workers confronting heavy restrictions of movement just to get to work, but we maintained best practice and focused on staying ahead of government policy. Keeping our people informed, safe and delivering the highest level of service to our clients is always paramount.

We embraced the national immunisation effort with our own very successful voluntary employee COVID-19 vaccination incentive program, which continued to April 2022. Results demonstrated 100% double vaccination rate in NSW and VIC and 98% double vaccination across the entire country.

The Health and Wellbeing of Our People

Appreciating the mental health implications of the pandemic, we ran a campaign to reinforce how much we value our people and are here to support them, reiterating the availability and details of our employee assistance program.

In May 2022 we launched our Intranet, BIC Connect, which includes a Health and Wellbeing Program. It provides every member of our team with personalised access to complimentary world-class mental, emotional, and physical wellbeing support, continuous personal learning opportunities, along with a range of other benefits.

Every individual will experience the challenges of life differently, so the BIC Health and Wellbeing Program has been designed to give our people access to a range of tools that guide and enables them to manage their own personal happiness, growth and development journey.

We continue to assess the products and services we provide to ensure we are progressive and effective in the cleaning and sanitising of our and our clients' assets while adhering to our Green Cleaning Policy and Plan to minimise chemical use and environmental impacts wherever possible without compromising results.

Caring for our people has been foremost in our minds and where we have the greatest level of control, including safeguarding against any increase in modern slavery risks because of COVID-19.

The Impact of Covid-19

Our actions below included several initiatives subsequently recommended as best-practice in the Australian Border Force guidance:

- An increased focus on training to ensure staff are equipped to handle the pandemic. Through the BIC Training Academy, we rolled out training courses including a training video specifically for pandemic cleaning.
- Improved levels of personal protection equipment (PPE), including complimentary personal-use reusable masks for every employee, given the heightened risk our employees faced as frontline workers.
- Maintaining employment for our employees through the negotiations we undertook with the unions to relax the minimum engagement of a four-hour shift, so that employees could job share and retain vital income.
- Gaining permission to extend the maximum hours that can be worked by employees on student visas to 40 hours from the original 20-hour mandate.

Suppliers and Products

While most of our Tier 1 suppliers are Australian based, we knew that some would be reliant on lower tier supply chains with some in countries that are at high risk of modern slavery, and that the pandemic would place additional stresses on the overseas workforces and related supply chain logistics.

We met with several of our suppliers who import items from overseas to discuss the effects experienced due to COVID-19 and steps to put in place to remedy issues faced. One of the biggest issues was logistics. There are just as many freight companies as prior to the pandemic, but they are all making fewer trips, which saw increases not only in cost, but in delivery times.

We remedied this by ordering in larger quantities but putting in place longer lead times on orders of six months in advance, so as not to add pressure down the supply chain. We did have to add a few more suppliers to spread the risk of supply as well.

COVID-19 has not materially changed our risk profile nor slowed down our due diligence and preventive efforts in identifying and mitigating our modern slavery risks. We remain actively engaged with our suppliers on modern slavery safeguards and continue to implement our broad Modern Slavery Framework and pursue the actions within it, as detailed elsewhere within this statement.

Delivering on Our Purpose – Smart Solutions for Healthy Communities

With cleaning so much in the spotlight now, it is becoming more and more important to exceed service expectations, instil confidence in our clients, building occupants and visitors, and the public. This goal will drive innovation across the industry, and

continued investment in technology, training, sustainability, and communications.

Our BIC Training Academy will maintain increased focus on upskilling around infection control and enhancing the quality of the personal interactions between our team members and the people they encounter each day.

We see our clients more as partners in the same enterprise of creating engaging, safe, and inspiring spaces.



Our Supply Chain

BIC aims to source goods and services efficiently and fairly, engaging suppliers who share BIC's beliefs in responsible supply chain management and core values.

We ensure due diligence is undertaken before entering into any supplier relationship and in-line with BIC's Rules of Engagement for Suppliers. When looking at engaging a supplier, we ensure they are reputable and Cm3 prequalified as a minimum.

BIC is committed to the ongoing review of its supply chain and a shift from sourcing goods and services from high-risk countries to Australian and Indigenous suppliers, where possible.

We maintain our Cm3 supplier management portal (with prequalification including ethical sourcing module, service agreements and corresponding KPIs), together with supplier audits to ensure transparency and consistency throughout the chain.

Supplier Obligations

Suppliers are expected to maintain fundamental labour and human rights standards, and from October 2022 are required to sign the Bidvest Code of Ethical Purchasing and comply with all applicable laws and regulations of the jurisdictions in which the suppliers are doing business, including employment laws, maintaining just and decent working conditions and implementing sound environmental and security measures.

In the case of breaches of BIC's Human Rights Policy and/or the Bidvest Code of Ethical Sourcing, suppliers will be required to provide remedial actions. Where necessary, depending on the severity of the breach, BIC will establish corrective action plans to support suppliers in developing their capabilities and improve their performance.

BIC is committed to working in partnership with its suppliers to help them achieve compliance with Modern Slavery legislation. In the event a supplier is unwilling or unable to demonstrate continuous improvement towards full compliance, the trading agreement between BIC and the supplier will be terminated.

BIC's Compliance Team conduct ongoing auditing of our Tier 1 supply chain, and this monitoring and review process forms part of our due diligence and provides a level of assurance that our supplier's governance practices are aligned with BIC's core values and ethical approach, and that mitigation strategies of modern slavery risks have been implemented in their operational procedures.

In FY22 an audit of 15 suppliers across a number of industries including cleaning and waste management services, chemicals and uniform provision was conducted. Out of a maximum score

of 110, the average was a score of 106 for the component of our audit that covered awards, working hours, leave, wages, fair working conditions, modern slavery response and supplier due diligence.

Our Ongoing Commitment

To date we have not identified any instances of modern slavery within BIC, or our supply chain. We will continue to place high priority on monitoring and safeguarding the wellbeing and rights of all workers. We will always encourage any suspected victims, or anyone that believes someone is a potential victim of modern slavery to lodge their concerns, and we will always handle such concerns with compassion, confidentiality and in good faith.

In late 2022 we upgraded our free membership of the Supply Chain Sustainability School to a Fellowship status. In addition to enhancing employee learning and development and expanding our collaboration with like-minded organisations, this will enable us to extend training on modern slavery and other material sustainability focus areas to our suppliers and to set and track target achievements.



Case Study**Working with Our Partners****AN AUDIT OF BIC'S UNIFORM AND CORPORATE WEAR SUPPLIER****Uniforms and Corporate Wear – Riverina Work Wear**

Riverina Work Wear (RWW) is BIC's uniform and corporate wear supplier with a workforce of 50 staff. As a supplier of goods manufactured overseas, they are classified as a high-risk supplier.

On that basis, in accordance with our procedures, BIC undertook an audit of RWW in March 2022. We also engage with them on an ongoing basis to ensure their approach to managing modern slavery risks in their own supply chain are consistent with our own approach and commitments.

The most recent audit showed RWW's efforts to identify and mitigate their modern slavery risks were very advanced. While they have adopted a zero tolerance to any form of modern slavery, they work with their suppliers to help prevent social risk issues arising in the first place, as well as addressing any found through their own audit programme.

RWW's suppliers and manufacturing plants are audited by Sedex Members Ethical Trade Audit (SMETA), and they report back on findings or compliance issues for RWW to consider – along with their other partners.

RWW has policies and procedures in place, including compliance in their employment obligations, along with Ethical Sourcing and Sustainability Policies. All of these are aligned with:

- Business integrity
- Labour rights
- Freedom to choose employment
- Working conditions
- Child labour
- Living wages
- Working hours
- Discrimination
- Harsh or Humane Treatment
- Entitlement to Work and Immigration.

We are satisfied that RWW monitors its supply chain and conducts regular supplier audits focused on their sourcing from Asia. The audits, conducted by SMETA and factory tours by RWW include interviews with factory workers.

As a regional Australian company with headquarters in Leeton NSW, RWW abides by modern slavery and human trafficking rules, but because their annual turnover is less than \$100,000,000 – they are not required to provide their own statements under Australia's Modern Slavery Act.





Whistleblowing Protection, Remediation and Victim Support

BIC encourages an open and transparent workplace and a culture of reporting any suspected wrongdoing.

We take all reasonable steps to protect those reporting possible human rights or modern slavery incidents. This is formerly communicated in our Human Rights Policy, which is included in onboarding, induction, and our employee take-home pack.

In FY22 we established a third-party anonymous channel for reporting any potential incidents of modern slavery and created workplace posters on spotting the signs of modern slavery and to grow awareness of our third-party anonymous reporting channels. Face-to-face dialogue and ongoing training are also provided in this regard.

BIC is eager to investigate and address any complaints reported, and internal roles have been assigned to make sure this is done in a consistent and confidential manner with our GM – People and Culture managing the strategy.

While no concerns were raised in FY22, we received notification in FY23 of one concern being raised via a third-party anonymous channel that BIC may be contributing to the occurrence of Modern Slavery practices. This was investigated and determined to be unfounded, and the case closed.

We are also committed to working closely with law enforcement authorities to respond to any reported modern slavery instances, though to date this has not been required. Our commitment extends to providing ongoing assistance and support to any victims of modern slavery relating to our business if an incident was to arise.

BIC is eager to investigate and address any complaints reported, and internal roles have been assigned to make sure this is done in a consistent and confidential manner with our GM – People and Culture managing the strategy.

Assessing Effectiveness

Our approach to assessing the effectiveness of our framework and governance practices is still a work in progress. Currently this includes the following:

Action	Performance indicator	Our performance to date
Modern Slavery Steering Committee	<ul style="list-style-type: none"> Meeting frequency MSF reviewed annually 	Quarterly meetings to continue for new Working Group for FY23. MSF reviewed annually.
Suppliers	<ul style="list-style-type: none"> Percentage (%) of suppliers accepted to BIC's Register of Approved Suppliers, including conformance with BIC's human rights policy, Code of Ethical Conduct and Cm3 prequalification 	100%
Operational and Supplier breaches	<ul style="list-style-type: none"> Number of breaches of BIC's Human Rights Policy and supplier qualification requirements Number of corrective action plans agreed (and progressed) 	0 0
Training	<ul style="list-style-type: none"> Percentage (%) of BIC's management team trained to recognise and safeguard against modern slavery risks Percentage (%) of BIC's staff trained to recognise and safeguard against modern slavery risks 	100% 100%
Modern slavery instances	<ul style="list-style-type: none"> Number of reported concerns Number of concerns substantiated Number of instances remedied and how 	1 (Reported in FY23) 0 0

The Way Forward

Our Modern Slavery Framework (MSF) was developed to ensure a consistent, all-of-business response to the risk of modern slavery within our business and industry. The MSF is subject to review by the Modern Slavery Working Group, to ensure it remains fit for purpose in an evolving business and regulatory environment. Our MSF is detailed in full below. Most of the actions set out here have been enacted, with some completed and others ongoing with periodic review.

Status Key:



Operationised



In progress



Ongoing



Planned

BIC Services Modern Slavery Framework

Aspect	Deliverable	Responsibility	Status	
Establish robust governance of modern slavery response	Cross-functional Modern Slavery Steering Committee established and meet regularly to lead implementation, monitor and review progress against framework.	CEO	Steering Committee established in November 2019 with a revised Working Group structure going forward.	
	Signatory to the United Nations Global Compact (UNGC) and support the Ten Principles on human rights, labour, environment and anti-corruption.	CEO	Became a Signatory to the UNGC in December 2020.	
	Human rights policy developed and reference to human rights integrated into related policies and codes of conduct.	GM – People & Culture	Last reviewed September 2022.	
	All policies and codes of conduct to be reviewed bi-annually or more often as required.			
	Incorporate modern slavery risks on our risk register.	Compliance Manager		
Maintain register of approved suppliers through Cm3 platform to ensure high risk suppliers are identified and prequalified in ethical, health and safety and environmental standards, have read and commit to our Human Rights policy and Code of Ethical Purchasing.		GM – Commercial Excellence		

The Way Forward

Aspect	Deliverable	Responsibility	Status	
	Maintain a robust procurement process to ensure due diligence is undertaken before entering into any supplier relationship and with ongoing review of supplier modern slavery responses.	GM – Commercial Excellence		
	Suppliers to provide rectification actions of any breaches. Depending on the severity of the breach, where possible, BIC to establish corrective action plans to support suppliers in developing their capabilities and improving their performance. Termination of supplier relationship will occur when a supplier refuses or fails to implement rectification measures.	GM – Commercial Excellence		
	Develop and implement a strategic plan to engage and ensure employees understand their roles and responsibilities in combating modern slavery, from frontline cleaners to senior management across our operations.	GM – People & Culture	Multiple channels launched in 2022 to operationalise this.	
	Develop a measurement and evaluation process to benchmark the effectiveness and long-term impact of our modern slavery response.	GM – Commercial Excellence	While we have metrics in place to monitor performance, we are yet to develop an effective measure of impacts from our response.	
	Publish an annual Modern Slavery Statement (Statement) for the purpose of reporting under the Australian Modern Slavery Act 2018 (Cth).	GM – Commercial Excellence	This is our 3rd annual Modern Slavery Statement.	
Internal and external engagement to grow awareness, build capability and strengthen response	Engage with other like-minded organisations including clients, suppliers, government and civil society representatives to grow our understanding, raise awareness and identify solutions to mitigate and remediate modern slavery risks across our value chain.	GM – Commercial Excellence		

The Way Forward

Aspect	Deliverable	Responsibility	Status
	Continue engagement with independent representative bodies, employee representatives and unions to further improve cleaning and labour standards in the industry to support the health, safety and prosperity of workers and protect their rights to fair wages and decent working conditions.	GM – People & Culture	
	Training and capability building of our people via multiple channels including employee induction program, online learning modules, face-to-face training and toolbox talks, newsletters, blog and social media.	GM – People & Culture	
	Promote our commitments via face-to-face engagement with key stakeholders, publication of our annual Modern Slavery Statement, UNGC Communication on Progress, sustainability report and other communication activities via industry media, client newsletters, BIC website, blog, and social media.	GM – Commercial Excellence	
Grievance and remediation	Implement an effective operational-level grievance mechanism to identify and remediate modern slavery in business operations and supply chains.	GM – People & Culture	
	BIC management take all reasonable steps to protect anyone from reprisals for making a disclosure and afford natural justice to people who are the subject of the disclosures.		
	Work closely with law enforcement to respond to reported modern slavery crimes.	GM – People & Culture	
	Provide ongoing assistance and support to victims of modern slavery e.g. via employee assistance programs, financial support, mentoring and workplace support.	GM – People & Culture	
	Work closely with government and civil society organisations to ensure victims receive the support and help they need.	CEO	

Modern Slavery Act 2018 (Cth)

Statement Annexure

Principal Governing Body Approval

Our Modern Slavery Statement was approved by the Board of BIC Services, the principal governing body as defined by Modern Slavery Act 2018 (Cth)³ (“the Act”) on 16 December 2022.

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of Board of Directors as defined by the Act⁴:



Tony Gorgovski

as Chief Executive Officer and representative of The Board

3. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

4. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act.

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page/s
a Identify the reporting entity.	2
b Describe the reporting entity's structure, operations and supply chains.	7–9
c Describe the risks of modern slavery practices in the operations and supplychains of the reporting entity and any entities it owns or controls.	11–14
d Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	15–25
e Describe how the reporting entity assesses the effectiveness of these actions.	27
f Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	BIC does not own or control any other entities
g Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	N/A



B.I.C. Services Pty. Limited
12 Rothesay Avenue, Ryde NSW 2112
T. 1800 683 863 | W. bic-services.com.au