

# MODERN SLAVERY FRAMEWORK

B.I.C. Services Pty. Limited (BIC) strongly opposes any and all human rights violations, including acts of slavery or human trafficking. The Modern Slavery Act 2018 requires entities above a consolidated revenue threshold of \$100 million to report on modern slavery risks in their global supply chains.

The Act targets modern slavery and human trafficking in supply chains with the aim of increasing transparency around these issues for consumers and investors and improving workplace anti-slavery practices by holding businesses to account. BIC's Modern Slavery Framework (MSF) was developed to address these requirements.

Where we have identified adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in, their fair and equitable remediation. We seek to promote access to remediation where we are linked to or involved in those adverse impacts through our relationships with third parties.

## RELATIONSHIPS

As an Australian owned and operated business, we have a corporate social responsibility to establish long-term relationships with all partners and suppliers, seek sustainable solutions, and work together to drive improvements.

To ensure our commitment to the MSA, we will commit to develop long-term and measurable outcomes for communities in which we operate.

BIC requires its direct Suppliers to comply with all applicable laws and regulations and with BIC's Human Rights Policy. Suppliers are expected to maintain fundamental and human rights standards and to adopt similar policies within their own businesses.

Action	Deliverable	Responsibility
Establish a Modern Slavery Steering Committee (MSSC).	<ul style="list-style-type: none"><li>Form a Modern Slavery Steering Committee who will review, evaluate and measure compliance and drive improvements along its supply chain.</li></ul>	CEO, EHS & Procurement Manager, Culture and Strategy Director, HR Manager, Training & Compliance Officer.
Build and strengthen internal and external relationships.	<ul style="list-style-type: none"><li>Maintain a Register of Approved Suppliers who have been approved by BIC based on the Supplier Evaluation Questionnaire and CM3 pre-certification for partners with applicable expertise and geographical areas, as well as those we can connect with to combat modern slavery.</li></ul>	EHS & Procurement Manager, Training & Compliance Officer, WHS Officer.

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	<ul style="list-style-type: none"> <li>Maintain our strong relationship with The Cleaning Accountability Framework (CAF) and the numerous multi-stakeholder partnerships to improve cleaning and labour standards in the cleaning industry.</li> <li>Develop a list of other like-minded organisations that we could approach to connect with on our modern slavery journey.</li> </ul>	<p>CEO, HR Manager.</p> <p>CEO, EHS &amp; Procurement Manager, Culture and Strategy Director, HR Manager.</p>
Communicate our Human Rights Policy and Modern Slavery Framework commitments internally and externally.	<ul style="list-style-type: none"> <li>Communicate to internal staff and stakeholders our Modern Slavery commitments through the BIC Training Academy, BICConnect, Tool Box Talks, Newsletters and ongoing management/staff workshop and training programs.</li> </ul>	EHS & Procurement Manager, Culture and Strategy Director, HR Manager, Training & Compliance Officer.
	<ul style="list-style-type: none"> <li>Promote our commitments via professional media, Client Newsletters and BIC blogs via our website and LinkedIn.</li> </ul>	HR Manager.
	<ul style="list-style-type: none"> <li>Develop and implement a strategic plan to engage and encourage key internal stakeholders of their responsibilities to combat modern slavery.</li> </ul>	CEO, EHS & Procurement Manager, Culture and Strategy Director, HR Manager, Training & Compliance Officer.

## PREVENT AND PROTECT

BIC is a large and diverse employer of choice across all States and Territories in Australia. As such, we recognise that we possess the ability to contribute significantly in the fight against modern slavery.

Action	Deliverable	Responsibility
Raise awareness.	<ul style="list-style-type: none"> <li>We will continue to develop our understanding of those that engage in modern slavery crime. This is crucial to enabling us to most effectively target messaging aimed at stopping people becoming involved in modern slavery crime in the first place, as well as deterring offenders from continuing.</li> </ul>	HR Manager, Training & Compliance Officer, Regional Managers, Area Managers.
	<ul style="list-style-type: none"> <li>We will widely publicise the details of our awareness campaigns and initiatives to tackle modern slavery, sending a clear message that BIC will not tolerate any form of exploitation.</li> </ul>	HR Manager, Training & Compliance Officer, Regional Managers, Area Managers.
Explore opportunities to facilitate reporting of modern slavery crimes.	<ul style="list-style-type: none"> <li>Develop BICConnect to allow confidential and anonymous reporting of modern slavery crimes and encourage participation.</li> </ul>	CIO, Culture and Strategy Director, HR Manager, Training & Compliance Officer.

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	<ul style="list-style-type: none"> <li>Work closely with law enforcement to respond to reported modern slavery crimes.</li> <li>Strengthen and improve our operational practice to enable us to more readily identify the vulnerable.</li> </ul>	<p>HR Manager, Training &amp; Compliance Officer.</p> <p>CEO, EHS &amp; Procurement Manager, Culture and Strategy Director, HR Manager, Training &amp; Compliance Officer, Managers.</p>
Assist victims of modern slavery.	<ul style="list-style-type: none"> <li>Provide ongoing assistance and support for victims of modern slavery.</li> </ul>	HR Manager, Training & Compliance Officer.
	<ul style="list-style-type: none"> <li>Work closely with community organisation and charities dedicated to ensuring victims receive the support and help they need.</li> </ul>	HR Manager, Training & Compliance Officer.
Maintain systems and processes to comply with BIC's Human Rights Policy.	<ul style="list-style-type: none"> <li>Maintain systems to deliver services which are aligned with BIC's Human Rights Policy and its requirements.</li> </ul>	CEO, Quality Manager, EHS & Procurement Manager, Culture and Strategy Director, HR Manager, Training & Compliance Officer.

## MONITORING AND REPORTING

BIC understands that a true commitment to tackle modern slavery is demonstrated through complete achievement of target commitments made in our Framework and transparent reporting.

By on-going monitoring of our performance, we will ensure our genuine commitment to our goals and will allow us to identify areas of challenge and offer areas of improvement and enhancement along our anti-slavery journey.

Action	Deliverable	Responsibility
Transparency of supply chains.	<ul style="list-style-type: none"> <li>Prepare a modern slavery statement by December each year, complying with the MSA 2018 each financial year to ensure that its goods and services are not a product of supply chains in which modern slavery is taking place.</li> <li>Make BIC's modern slavery statement public via our website in accordance with the regulations and include information about the following:               <ol style="list-style-type: none"> <li>the organisation's structure, its business and its supply chains;</li> <li>its due diligence processes in relation to modern slavery in its business and supply chains;</li> </ol> </li> </ul>	<p>Culture and Strategy Director, HR Manager, Training &amp; Compliance Officer.</p> <p>HR Manager</p>

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	<ul style="list-style-type: none"> <li>c) the parts of its business and supply chains where there is a risk of modern slavery taking place, and the steps it has taken to assess and manage that risk;</li> <li>d) the training about modern slavery available to its employees.</li> </ul> <ul style="list-style-type: none"> <li>▪ BIC Suppliers will be expected to maintain fundamental labour and human rights standards as described in BIC's Human Rights Policy, MSF and the MSA 2018.</li> <li>▪ BIC Suppliers will be required to provide a modern slavery statement to BIC, irrespective of annual turnover.</li> </ul>	<p>Supply chain.</p> <p>Supply chain.</p>
Report on modern slavery challenges and learnings.	<ul style="list-style-type: none"> <li>▪ Establish a process for information gathering, reporting templates and monitoring of modern slavery issues.</li> <li>▪ Define systems and capability needs to track, measure and report on modern slavery activities.</li> </ul>	<p>CIO, Culture and Strategy Director, HR Manager, Training &amp; Compliance Officer.</p> <p>CIO, Quality Manager, HR Manager, Training &amp; Compliance Officer.</p>
	<ul style="list-style-type: none"> <li>▪ Report quarterly to BIC's Modern Slavery Steering Committee on effectiveness, issues and feedback.</li> </ul>	<p>CIO, Quality Manager, HR Manager, Training &amp; Compliance Officer.</p>
Ensure internal compliance and governance.	<ul style="list-style-type: none"> <li>▪ In line with our Human Rights Policy and related compliance guidelines, ensure consistency across the BIC business.</li> <li>▪ Maintain CAF Pre-certification status.</li> </ul>	<p>Quality Manager, HR Manager, Training &amp; Compliance Officer.</p> <p>CEO, HR Manager, Training &amp; Compliance Officer.</p>
Review and Refresh.	<ul style="list-style-type: none"> <li>▪ Liaise with BIC's Modern Slavery Steering Committee to develop a new framework as required based on the effectiveness of the current framework and learnings, challenges and achievements from the previous year.</li> </ul>	<p>HR Manager, Training &amp; Compliance Officer.</p>



Tony Gorgovski  
Chief Executive Officer – 28.11.18