

WWW.BIC-SERVICES.COM.AU

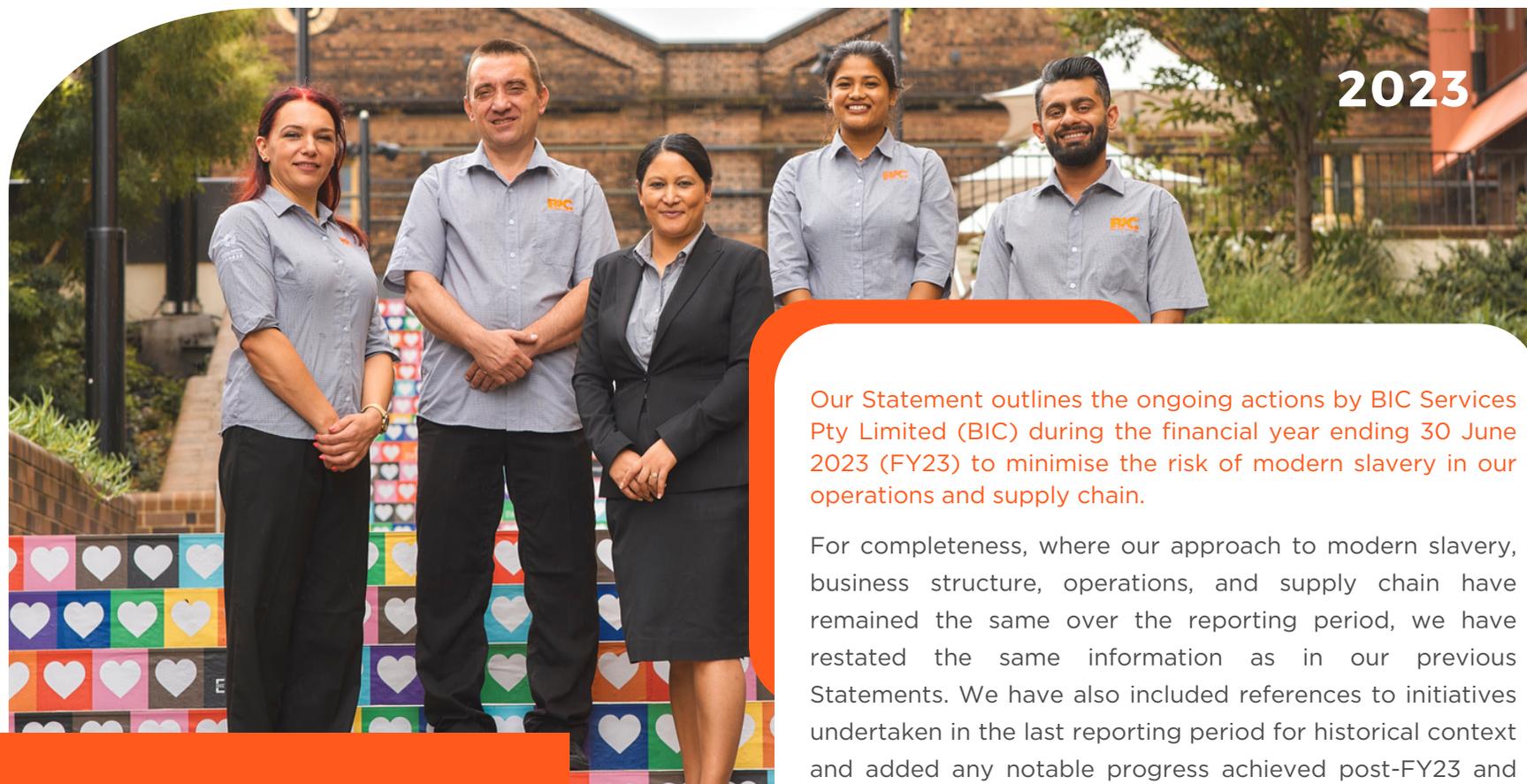
MODERN SLAVERY STATEMENT 2023



B.I.C. Services Pty. Limited
www.bic-services.com.au
1B Homebush Bay Dr
Rhodes NSW 2138
T. 1800 683 863



INTRODUCTION



2023

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

Our Statement outlines the ongoing actions by BIC Services Pty Limited (BIC) during the financial year ending 30 June 2023 (FY23) 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 in our previous Statements. We have also included references to initiatives undertaken in the last reporting period for historical context and added any notable progress achieved post-FY23 and before publishing this Statement for currency.

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

AGENDA

<u>CEO's</u>	<u>5</u>
<u>OUR MODERN SLAVERY ACTION HIGHLIGHTS</u>	<u>7</u>
<u>HOW WE CREATE VALUE</u>	<u>8</u>
<u>OUR STRUCTURE, OPERATIONS, AND SUPPLY CHAIN</u>	<u>9</u>
<u>SUPPLIER OBLIGATIONS</u>	<u>10</u>
<u>OUR ONGOING COMMITMENT</u>	<u>11</u>
<u>ORGANISATIONAL CHART</u>	<u>12</u>
<u>IDENTIFYING OUR MODERN SLAVERY RISKS</u>	<u>14</u>
<u>REVENUE AND PROCUREMENT SNAPSHOT</u>	<u>15</u>
<u>OUR ETHICAL SOURCING MODULE</u>	<u>16</u>
<u>OUR ACTIONS</u>	<u>17</u>
<u>OUR GOVERNANCE OF MODERN SLAVERY</u>	<u>18</u>
<u>GROWING AWARENESS AND CAPABILITY</u>	<u>20</u>
<u>CASE STUDY - WORKING WITH OUR PEOPLE</u>	<u>21</u>
<u>THIRD-PARTY MODERN SLAVERY AUDITS OF BIC SERVICES</u>	<u>22</u>
<u>POST PANDEMIC</u>	<u>23</u>
<u>SUPPLIERS AND PRODUCTS</u>	<u>24</u>
<u>CASE STUDY - WORKING WITH OUR PARTNERS</u>	<u>25</u>
<u>WHISTLEBLOWING PROTECTION, REMEDIATION, AND VICTIM SUPPORT</u>	<u>26</u>
<u>ASSESSING EFFECTIVENESS</u>	<u>28</u>
<u>THE WAY FORWARD</u>	<u>29-30</u>
<u>STATEMENT ANNEXURE</u>	<u>31</u>

ACKNOWLEDGEMENT



BIC Services acknowledges the traditional owners of the 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.



2
0
2
3

CEO's Foreword

With the COVID-19 pandemic well behind us, we have been dealing with the legacy issues created by the pandemic, such as supply chain delays and labour shortages. During the pandemic, we had an increased awareness of the modern slavery risks associated with our value chain and developed strategies to mitigate these risks to increase awareness of modern slavery risks and to work on strategies to mitigate these risks jointly. Thankfully, we have overcome these issues and are now returning to normality; however, the lessons learnt and strategies developed have strengthened our business.

Our relationship with our owners, the Bidvest Group Limited (Bidvest), has strengthened since being acquired in July 2022. With our aligned values and a mutual determination to eradicate modern slavery, we have had the opportunity to engage with other associated businesses in the Bidvest group to learn from one another about strategies to combat modern slavery wherever it occurs.

We recognize that human rights and modern slavery are critical and challenging issues that impact vulnerable people. BIC now has a turnover approaching A\$175 million at year-end and employs over 2,700 people; we have the size, passion, and commitment to make a real difference to our customers and community. This means we can make a genuine and lasting positive impact not only in our direct operations but also in our role as a leading service provider to our customers and our supply chain. We have zero tolerance for slavery, human trafficking, child labour, bribery and corruption and any abuse of human rights. We will do whatever we can to ensure that everyone has the right to make free choices and 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. Our subsequent updates have been delayed due to a technical issue associated with the UNGC portal.

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 2023 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 ensuring our approach is robust and effective.



BIC continues to be guided by its Core Values and Unique Selling Points (Our People, Innovation, Sustainability & Transparency) and is driven to maintain its leadership role within the cleaning industry.

Tony Gorgovski,
Chief Executive Officer

A handwritten signature in black ink, appearing to read 'Tony Gorgovski', written over a white background.



At BIC, we wholeheartedly embrace the chance to collaborate with fellow businesses within the Bidvest Group. Our aim is to foster mutual growth and share invaluable insights on our collective mission to eradicate modern slavery from every corner it lurks.

We are acutely aware that human rights and the fight against modern slavery are paramount concerns. These are complex issues that significantly affect the lives of vulnerable individuals. Our commitment to tackling these challenges remains unwavering.



Tony Gorgovski,
Chief Executive Officer

OUR MODERN SLAVERY ACTION HIGHLIGHTS



PROGRESSION OF BIC CONNECT

Our intranet platform to foster engagement with our people including health and wellbeing, safety and matters related to Modern Slavery.



SUPPLIER AUDITS

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



ANTI-BRIBERY & CORRUPTION TRAINING

Ensuring a workplace where our Management team act honestly, ethically and with integrity.



MODERN SLAVERY TRAINING

Through Supply Chain Sustainability School, further progressing the awareness and understanding of our management team in matters related to Modern Slavery.



CULTURAL AWARENESS TRAINING

Ensuring our Management team understand the complexities of cross-cultural communication to build harmonious teams that are highly engaged.



COLLABORATION WITH CLIENTS

Third Party audits of our operations and our responses to modern slavery and wellbeing of our employees.





HOW WE CREATE VALUE

OUR PURPOSE

Smart solutions for healthier 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 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.

OUR INPUTS

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

OUTPUTS

- Employ over 2,744 staff
- Work over 658,000 shifts
- Clean over 6.25 million sqm of office space
- Clean over 2,449 client sites at 1,263 locations

OUR STAKEHOLDERS

- Our people
- Property owners, managers & tenants
- Suppliers
- Unions
- Industry
- Government

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

All our business decisions involve our pillars, fostering positive behaviours to support our client's objectives.

Bidvest Group Limited acquired BIC on 7 July 22, and the relationship with our parent has strengthened with knowledge sharing to support the eradication of Modern Slavery. Bidvest was founded in 1988 and listed on the Johannesburg Stock Exchange in 1990. It is a leading South African industry group with over 260 individual businesses and employs approximately 130,000 people in South Africa, the United Kingdom, Ireland, Spain, and Australia.

BIC has 5 state-based offices, and we directly employ over 2,700 people working across more than 2,440 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 of the recruitment process, including training and induction, we apply the principles ingrained in our Modern Slavery Framework.

 **OVER**
2,700
EMPLOYEES

 **5**
STATE OFFICES

 **2,440**
CLIENT SITES

BIC SERVICES IS A LEADING PROVIDER OF INTEGRATED CLEANING SERVICES IN AUSTRALIA AND HAS BEEN OPERATING SINCE 1989.



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 Cm 3 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 Cm 3 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.



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.

Supplier Obligations

Suppliers are expected to maintain fundamental labour and human rights standards. All supplier onboarding agreements now include Bidvest's 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 improving 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 toward full compliance, the trading agreement between BIC and the supplier will be terminated.

BIC's Compliance Team conducts 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. It also ensures that mitigation strategies of modern slavery risks have been implemented in their operational procedures.

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 well-being and rights of all workers. We will always encourage any suspected victims or anyone who believes someone is a potential victim of modern slavery to lodge their concerns, and we will always handle such concerns with compassion, confidentiality, and good faith.



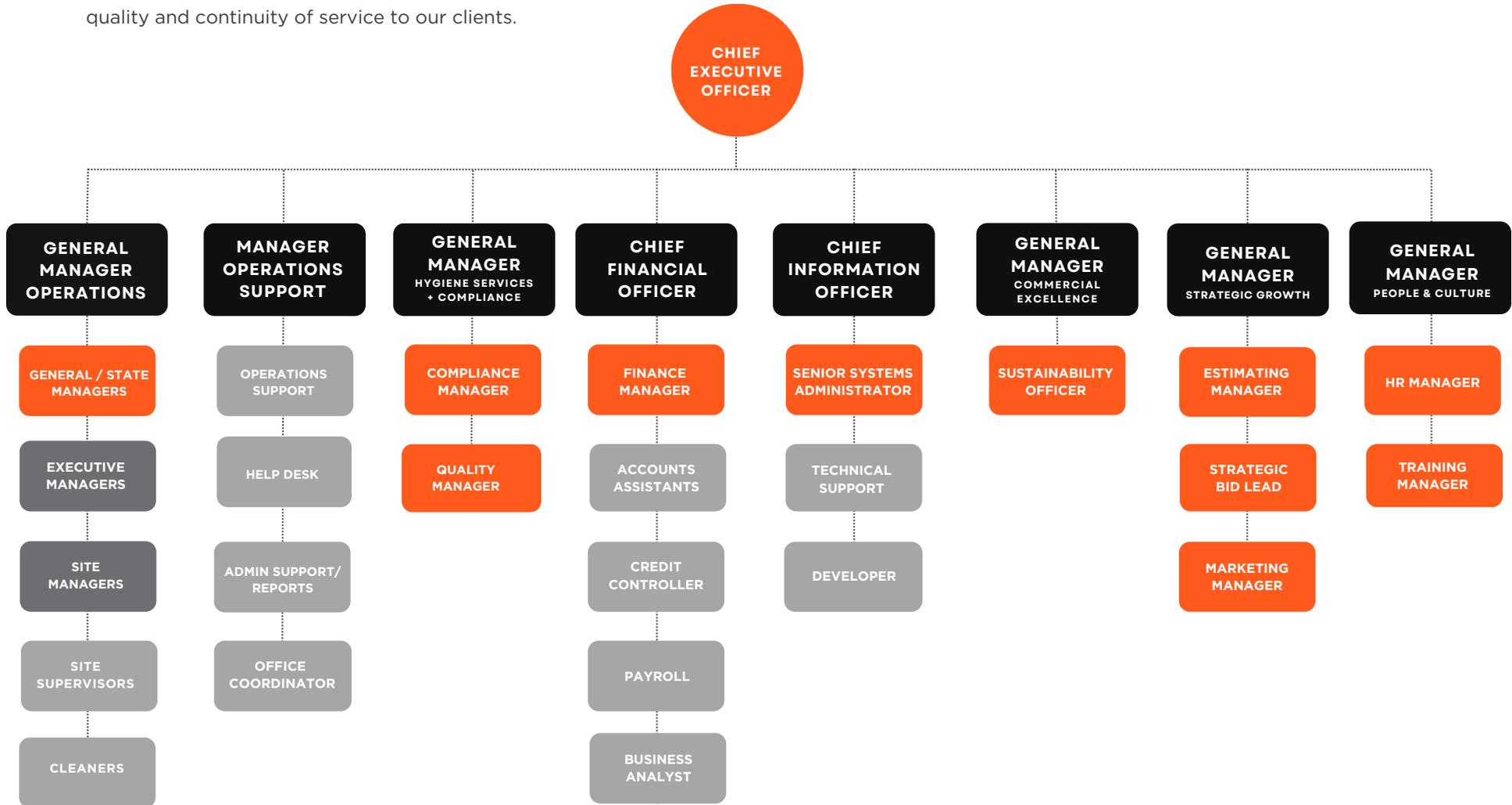
In 2022, we upgraded our Supply Chain Sustainability School membership to a Fellowship status. In addition to enhancing employee learning and development and expanding our collaboration with like-minded organisations, this has enabled us to extend our training of modern slavery and other material sustainability focus areas.



ORGANISATIONAL CHART

EXECUTIVE MANAGEMENT

With over **2,400 client** sites across Australia, BIC has 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 enthusiastically seized the chance to set a shining example of an ethical approach in what is recognized as a high-risk industry for modern slavery.

This endeavour serves the well-being of our employees, clients, and tenants and safeguards the overall health and reputation of our business and the entire industry.



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, clients, and tenants, and the health and reputation of our business and industry.

IDENTIFYING OUR MODERN SLAVERY RISKS

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 partly due to the robust safeguards we have implemented and 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) is committed to delivering multiple levels of support and ongoing monitoring of our on-site personnel.

All of our direct workforce reside in Australia and are entitled to Australian work rights and any visas are vetted by the Department of Immigration. This ensures compliance with legislation and best practices 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.

Revenue and Procurement Snapshot

BIC uses a range of suppliers to provide cleaning materials and chemicals, equipment, and uniforms and engages specialists to provide high-rise window cleaning, hygiene, and waste removal.

In **FY23**, our supplier spending was AU\$11 million, and our five largest clients accounted for more than 73.3% of this spending.

FY23 Revenue Streams

- General Cleaning **49.15%**
- Hygiene Services **7.54%**
- Materials **13.56%**
- Pest Control **0.54%**
- Toiletries **11.99%**
- Waste Removal **15.83%**
- Window Cleaning **1.39%**



\$11 million

Supplier spend in FY23.



73.3%

of spend accounted for from our five largest clients.

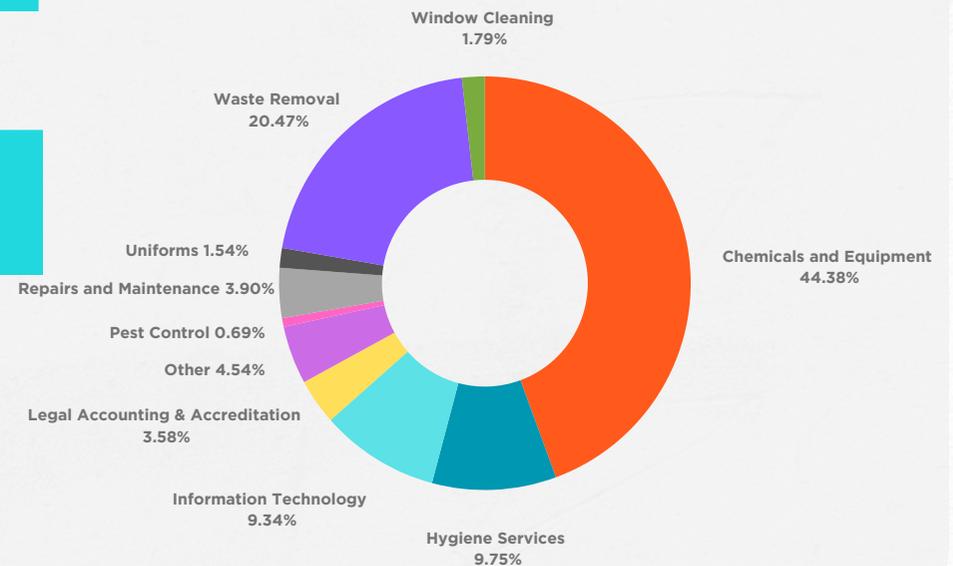
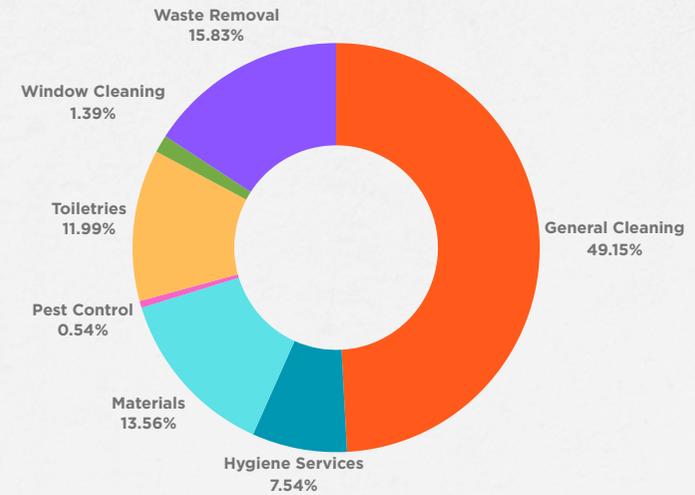


\$149.5 million

Annual revenue in FY23.

FY23 Procurement Categories

- Chemicals and Equipment **44.38%**
- Hygiene Services **9.75%**
- Information Technology **9.34%**
- Legal Accounting & Accreditation **3.58%**
- Other **4.54%**
- Pest Control **0.69%**
- Repairs and Maintenance **3.90%**
- Uniforms **1.54%**
- Waste Removal **20.47%**
- Window Cleaning **1.79%**



Our Ethical Sourcing Module

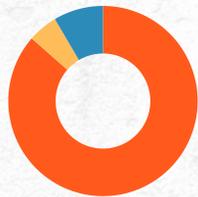
Our Ethical Sourcing Module enhances our effectiveness in identifying potential risks and enables us to prioritise and tailor further supplier engagement where there are areas of greatest risk.

Ethical Sourcing Risk Profile.



Number/% of suppliers that have completed our Ethical Sourcing assessment module.

Supplier Breakdown by Annual Revenue.



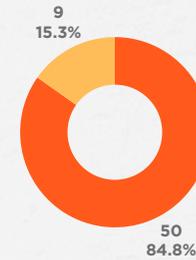
51 Less than \$50M
3 \$50M to \$100M
5 \$100M and above

Tier 1 Suppliers

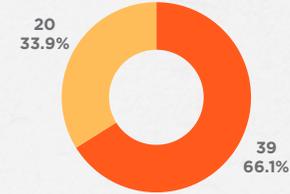
59

No
Yes

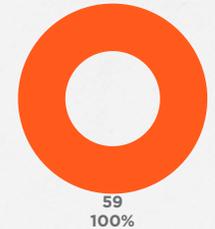
Overseas Supply



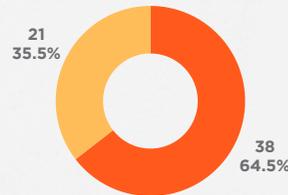
At Risk Industries



Overseas Workforce



Vulnerable Workforce



Legal Breaches



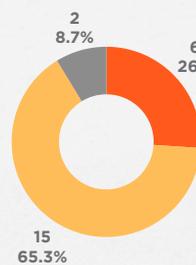
Tier 2 Suppliers

23

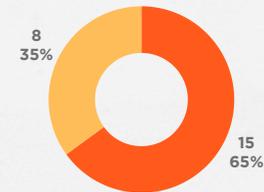
engage vendors

Yes
No
Don't know

Overseas Supply



Overseas Workforce



Legal Breaches



Our Actions

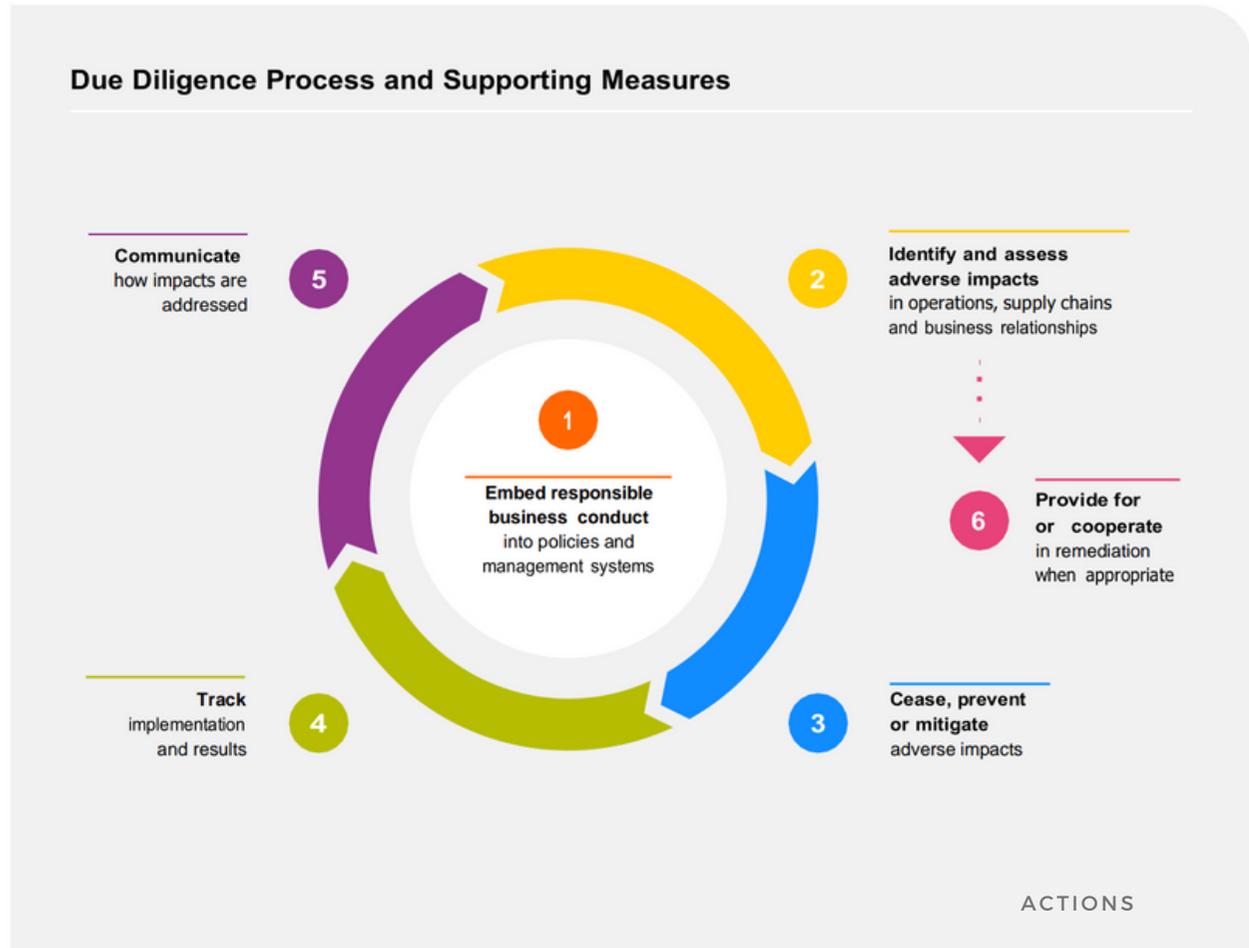
BIC understands the significant role it plays in taking a precautionary approach and driving positive change to ensure our supply chain and operations are protected from modern slavery practices.

Actions taken during the FY23 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.

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, by 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, complying with our Human Rights Policy, our Modern Slavery Framework (see pages 29-30), and our Employee Code of Conduct. Our Suppliers are expected to maintain fundamental human rights standards and adopt similar policies within their own businesses. In addition, they must sign and comply with Bidvest's Code of Ethical Purchasing.

In FY23, BIC reviewed all policies and procedures to ensure that they were consistent and effective in responding to the Act. We also continue to ensure our systems adhere to our ISO-certified Integrated Management System to ensure the principles of BIC's Human Rights Policy are faithfully enacted across the business.

MODERN SLAVERY FRAMEWORK

BIC understands that a true commitment to approaching the targets set within our framework is through a true commitment to achieving them and through complete and transparent reporting on the set actions. Our Modern Slavery Framework (MSF) outlines our actions and ensures a comprehensive all-of-business response to the issue of modern slavery.

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, measure compliance and drive improvements in our operating procedures and our supply chain.

The committee is comprised of leadership team members, including our CEO, GM - Commercial Excellence, GM - People and Culture, 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 - People & Culture and involve our GM - Commercial Excellence and Compliance Manager in quarterly reviews and call upon other relevant internal and external stakeholders as required to progress BIC's approach.

The GM - People & Culture will subsequently update the Executive Team at regular Executive Team meetings for feedback and any required endorsements.

“

At BIC, we comprehend that genuine dedication to combating modern slavery can be effectively demonstrated by reaching the objectives we establish within our framework, and by providing transparent, accountable reporting on our actions.

”

Growing Awareness and Capability

During the reporting period, BIC has proactively engaged and encouraged all to remain vigilant and speak up on potential human rights issues.

We continue to send a clear message that BIC will not tolerate any form of exploitation in our business, supply chain, or the wider industry.

As part of our responsibility to combat modern slavery, we ensure that employees, clients, suppliers and other stakeholders know our commitments and are updated regularly.

We do this through all available channels, including ongoing training and communication throughout all levels of the organisation, including newsletters, Toolbox Talks, blogs and LinkedIn, as well as our CEO updates and presentations.

Our sites have Modern Slavery posters 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.

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

In the CBD of Sydney, our Senior Operations Manager, Suman Adhikari, oversees The Rocks and Darling Harbour precinct, with over 150 BIC team members working a variety of roles, including cleaning workspaces, outdoor cleaning, and replenishing supplies.

The recent interview with Suman Adhikari sheds light on the BIC's commitment to combating modern slavery and promoting equal employment opportunities.

Suman completed BIC's modern slavery training modules in 2020 and 2023. "Our most recent training has solidified my knowledge of Modern Slavery. Before our initial training in 2020, we didn't necessarily know the full depth of what was considered Modern Slavery. With this training and our most recent training, we now know what Modern Slavery is and what to do if we come across it."

As the Operations Manager in charge of BIC's operations at The Rocks and Darling Harbour Precinct, Suman is one of many critical front-line people who work for BIC.

He works with a largely diverse team. "We have staff from many different backgrounds such as Thailand, Nepal, Bangladesh, Peru, and Spain and we love working as part of such a diverse team", he said.



Suman and his supervisors regularly engage with their teams and ensure that their teams understand that they can speak to them confidentially at any time about any matter that may impact their safety, health and well-being, including any issues around Modern Slavery.

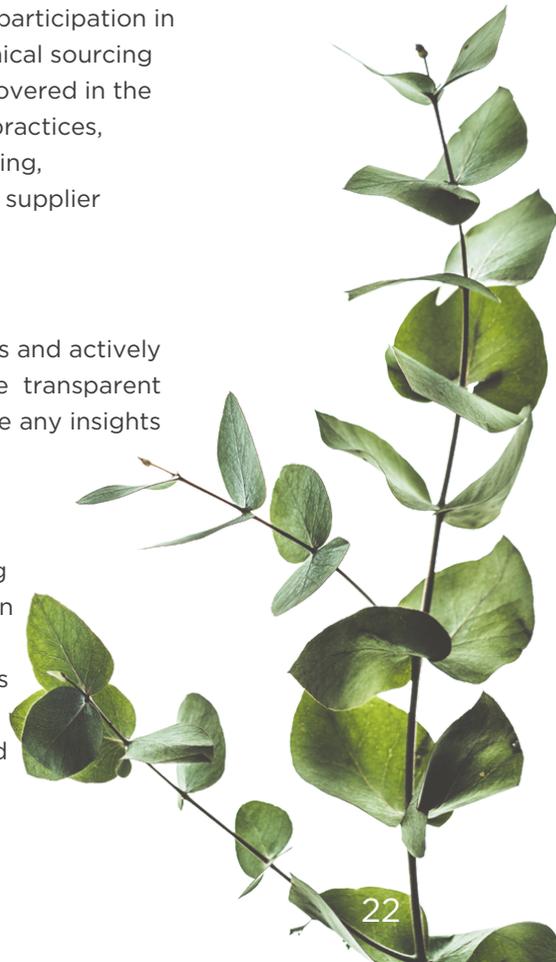
Third-Party Modern Slavery Audits of BIC Service



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 practices 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 safe work.
- 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.

Post Pandemic

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

COVID-19 is now well behind us however as in industry there were valuable lessons learnt and we remain ready, flexible, and adaptable to meet the changing demands of the industry, including any reemergence of the virus.

At BIC we reflect on those times and our actions below included several initiatives subsequently recommended as best-practice in the Australian Border Force guidance.

- 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

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 AND WASTE REMOVAL.

Whilst we aim to minimise the number of suppliers we engage, we have increased the number of suppliers over the years, partly due to COVID-19 but also the continued growth of the business. We also organically grown the services of a parent company PHS Hygiene Services to undertake Hygiene and Sanitary Services in-house thus improving our service delivery responsiveness and the visibility of products in our supply chain.

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.

At the same time, our preference is to engage Australian-based and Indigenous suppliers in line with our Reconciliation Action Plan commitments and our recent relationship with the Thread Group (an Australian-based indigenous company) is an example of our recent actions as we favour suppliers whose modern slavery and human rights policies and practices are aligned with our own.

Due to operational demand, the number of supplies and contractors audited during FY23 was down on the previous year however all new suppliers are considered low risk.

We continue 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.

BIC continues to use the Cm3 Contractor Management Platform, inclusive of the Ethical Sourcing Module to manage and prequalify our supply chain. This module enhances our effectiveness in identifying potential risks and prioritising our supplier engagements where there are areas of greatest risk.



Working with Our Partners



AN AUDIT OF BIC'S UNIFORM AND CORPORATE WEAR SUPPLIER

Uniforms and Corporate Wear – The Thread Group Australia

BIC has recently partnered with The Thread Group Australia as BIC's uniform and corporate wear supplier. The selection of The Thread Group was decided by a thorough review and procurement process.

The Thread Group is a **Certified Indigenous Business**, manufacturer, and supplier of goods manufactured overseas; therefore they are classified as a high-risk supplier.

BIC commenced a due diligence and audit exercise of The Thread Group in early 2023 to examine the credentials and compliance of the business. The outcome of the review supported our discussions with The Thread Group that they had in place a Modern Slavery program hence we were willing to include The Thread Group on our tender list.

As an Australian manufacturer, The Thread Group is accredited by Ethical Clothing Australia and is subject to annual audits for compliance that include aspects of Modern Slavery. The Thread Group has policies and procedures in place, and their Code of Conduct is aligned with the Ethical Trading Initiative (ETI) Base Code and the International Labor Organization's (ILO) Four Fundamental Principles and Rights at Work.

In addition to these principles and rights, The Thread Group has implemented specific supporting policies, including but not limited to environmental responsibility and animal welfare, to assist with the prevention and management of unacceptable conditions.

The Thread Group Code of Conduct & Policies applies to all levels of the supply chain, including but not limited to:

- Final stage factories and suppliers
- Textile and trims suppliers
- Wet processing facilities
- Sub-suppliers & sub-contractors of any facility or supplier
- Raw material processing facilities
- Farm, husbandry, shearing, etc.

The Thread Group's suppliers and manufacturing plants are audited by a variety of third-party auditors such as WRAP, SMETA, ISO, BCI, RDS, RWS, GRS, LWG, Oeko-Tex, Bluesign, etc. Audit results and certifications are shared with The Thread Group in line with their corporate policies and supplier agreements.

We are satisfied that The Thread Group monitors its supply chain and conducts regular supplier audits focused on sourcing from Asia.

Whilst The Thread Group has adopted zero tolerance to any form of modern slavery, they work with their suppliers to help and prevent social risk issues from arising in the first place, as well as addressing any issues identified in their audit program. We will be engaging with The Thread Group regularly to review their ongoing approach to managing modern slavery risks in their supply chain and their views and plans are in alignment with our approach and commitments.

As an Australian and Indigenous company with headquarters in Moorabbin Victoria, The Thread Group 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 ensures that our staff know that when they speak up, they will be listened to and responded to without fear of retaliation or victimisation.

This is formally communicated in our Human Rights Policy, which is included in onboarding, induction, and our employee take-home pack.

BIC has a third-party anonymous channel in place for reporting any potential incidents of modern slavery and each workplace has posters on spotting the signs of modern slavery and to ensure awareness of our third-party anonymous reporting channels.

Face-to-face dialogue and ongoing training and communication are also provided in this regard through regular Toolbox Talks.

BIC is eager to investigate and address any complaints reported, and internal roles have been assigned to make sure this is done consistently and confidentially with our GM - People and Culture managing the strategy.

In FY23, we received a notification through a third-party anonymous channel expressing a concern that BIC might be contributing to the occurrence of modern slavery practices. Upon investigation, this concern was found to be without merit, and the case was subsequently closed.



Our commitment extends to providing ongoing assistance and support to any victims of modern slavery relating to our business if an incident were to arise.



BIC is committed to thoroughly investigate and promptly resolve any complaints that are brought to our attention. To ensure consistent and confidential handling of these matters, specific roles within our organisation have been designated for this purpose, overseen by our General Manager - People and Culture, who is responsible for steering our strategic approach in this area.





Assessing Effectiveness

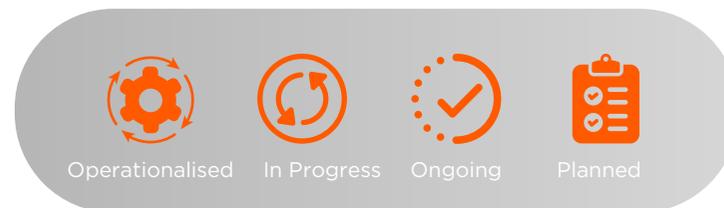
Our approach to assessing the effectiveness of our framework and governance practices is still a work in progress. Currently includes the following:

Modern Slavery Steering Committee	<ul style="list-style-type: none"> • Meeting frequency • MSF reviewed annually 	<ul style="list-style-type: none"> • Quarterly meetings to continue for the Working Group for FY24. MSS is reviewed annually.
Operational and Supplier breaches	<ul style="list-style-type: none"> • Percentage (%) of suppliers accepted to BIC's Register of Approved Suppliers, conformance with BIC's Human Rights Policy, Code of Ethical Conduct, Bidvest Code of Ethical Purchasing, and Cm3 prequalification. 	<ul style="list-style-type: none"> • 100%
Operational and Supplier breaches	<ul style="list-style-type: none"> • Breaches of BIC's Human Rights Policy and supplier qualification requirements. • Number of corrective action plans agreed (and progressed) 	<ul style="list-style-type: none"> • 0 • 0
Training	<ul style="list-style-type: none"> • Percentage (%) of BIC's management team trained to recognize and safeguard against modern slavery risks. • Percentage (%) of BIC's staff trained to recognize and safeguard against modern slavery risks. 	<ul style="list-style-type: none"> • 100% • 100%
Modern slavery instances	<ul style="list-style-type: none"> • Number of reported concerns. • Several concerns are substantiated. • Number of instances remedied and how. 	<ul style="list-style-type: none"> • 1 • 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



BIC Services Modern Slavery Framework

Aspect	Deliverable	Responsibility	Status	
Establish robust governance of modern slavery response.	A cross-functional Modern Slavery Steering Committee was established and met regularly to lead implementation, monitor and review progress against the framework.	CEO	The Steering Committee was 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. All policies and codes of conduct must be reviewed bi-annually or more often as required.	GM - People & Culture	Last reviewed August 2023.	
	Incorporate modern slavery risks on our risk register.	Compliance Manager		
	Maintain a register of approved suppliers through the Cm3 platform to ensure high-risk suppliers are identified and prequalified in ethics, health, safety and environmental standards and have read and committed to our Human Rights Policy and Code of Ethical Purchasing and the Bidvest Code of Ethical Purchasing.	Compliance Manager		
	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	The Steering Committee was established in November 2019 with a revised Working Group structure going forward.	
	Suppliers are to provide rectification actions for any breaches. Depending on the severity of the breach, BIC should 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		

Aspect	Deliverable	Responsibility	Status	
	Develop and implement a strategic plan to engage and ensure employees, from frontline cleaners to senior management across our operations, understand their roles and responsibilities in combating modern slavery.	GM - People & Culture	Multiple channels launched in 2022 now operationalised.	
	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 to monitor performance, we have 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 4th annual Modern Slavery Statement.	
Internal and external engagement to grow awareness, build capability and strengthen response.	Engage with like-minded organizations, 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		
	Continue engagement with independent representative bodies, employee representatives, and unions to improve the industry's cleaning and labour standards further to support workers' health, safety, and prosperity and protect their rights to fair wages and decent working conditions.	GM - People & Culture	The Steering Committee was established in November 2019 with a revised Working Group structure going forward.	
	Training and capability building of our people via multiple channels, including employee induction programs, online learning modules, face-to-face training and toolbox talks, newsletters, blogs 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 & GM Strategic Growth		
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 takes all reasonable steps to protect anyone from reprisals for making a disclosure and afford natural justice to people who are the subject of the revelations.			
	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 GM - People & Culture through employee assistance programs, financial aid, mentoring, and workplace support.	GM - People & Culture		
	Work closely with government and civil society organizations to ensure victims receive CEO 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 the Modern Slavery Act 2018 (Cth)³ (“the Act”) on 20 December 2023.

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

1. 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 this paragraph—a prescribed body within the entity, or a prescribed member or members.

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

A	Identify the reporting entity	<u>2</u>
B	Describe the reporting entity’s structure, operations and supply chains.	<u>9-12</u>
C	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	<u>14-16</u>
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.	<u>17-26</u>
E	Describe how the reporting entity assesses the effectiveness of these actions to assess and address moderns slavery risk.	<u>28</u>
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.**	<u>N/A</u>



B.I.C. Services Pty. Limited
www.bic-services.com.au
1B Homebush Bay Dr
Rhodes NSW 2138
T. 1800 683 863