

MODERN SLAVERY

Risk Management Plan



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A MESSAGE FROM THE CEO

As the CEO of Menzies Facility Services, myself and the entire Menzies team lead the organisation with Modern Slavery as a key pillar of our overall strategy and success.

THERE ARE MANY WAYS WHICH THIS ACHIEVED AND WILL BE OUTLINED WITHIN THIS PLAN, HOWEVER THE UNDERPINNING PRINCIPLES ARE AS FOLLOWS:

- > Consolidation of our supply chain and creating strong business partnerships with leading providers within their respective industries
- > Subjecting our supplier business partners to regular auditing and pulse check reviews
- > Implementation of an Environmental, Social and Governance [ESG] strategy which aligns to the objectives of our Modern Slavery plan
- > Primary use of a direct labour model, paying all staff in accordance with the relevant Modern Award or other Industrial instrument
- > Where specialist subcontractors are utilised, ensuring that they are subjected to our Subcontractor Management Systems [SMS] and are regularly audited to ensure compliance

WHO IS MENZIES?

Menzies is a provider of Education, Commercial and Industrial Cleaning services in the Facility Services Industry.

Menzies currently employs over 2,500 employees today, across all major Australian cities and regional centres and have been operating since 1969.

MENZIES PROVIDES END TO END PROPERTY MANAGEMENT SOLUTIONS TO MAJOR GOVERNMENT AND PRIVATE SECTOR CLIENTS WHERE OUR SERVICES INCLUDE:

- > Contract commercial cleaning
- > Contract industrial cleaning
- > Periodical services
- > Hygiene services
- > Pest control services
- > Grounds maintenance services
- > Signage cleaning and maintenance services
- > Car washing services
- > Fully integrated facility management services

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OBJECTIVE OF MENZIES MODERN SLAVERY RISK MANAGEMENT PLAN

Our Modern Slavery Risk Management Plan provides an overview of internal policies and tools to address modern slavery throughout the business and its supply chains.

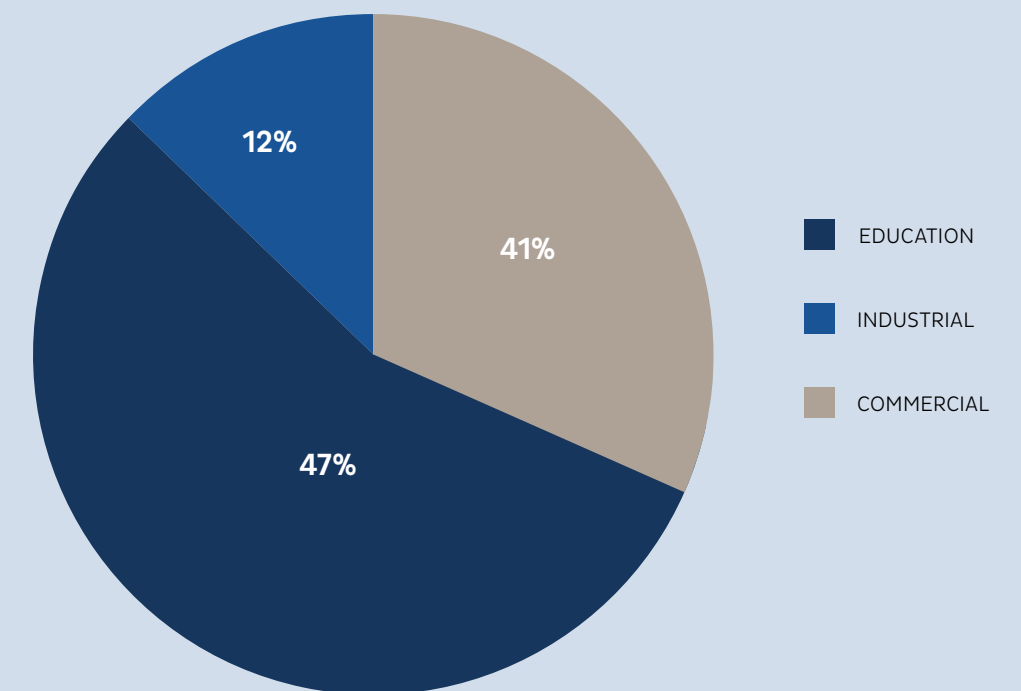
The plan is intended to support the company in monitoring actions and initiating the refinement of existing or the adoption of new instruments relating to forced labour and modern slavery.

It contributes to the extermination of modern slavery and forced labour within Menzies supply chains and assesses factors contributing to the effectiveness of our actions in practice.

The risk management plan elaborates on potential risks and consequences to the company related to modern slavery. Furthermore, it provides for responses and actions depending on risk level, outlines the resources and responsible personnel.

MENZIES KEY STATISTICAL INFORMATION

REVENUE BY SECTOR BREAKDOWN

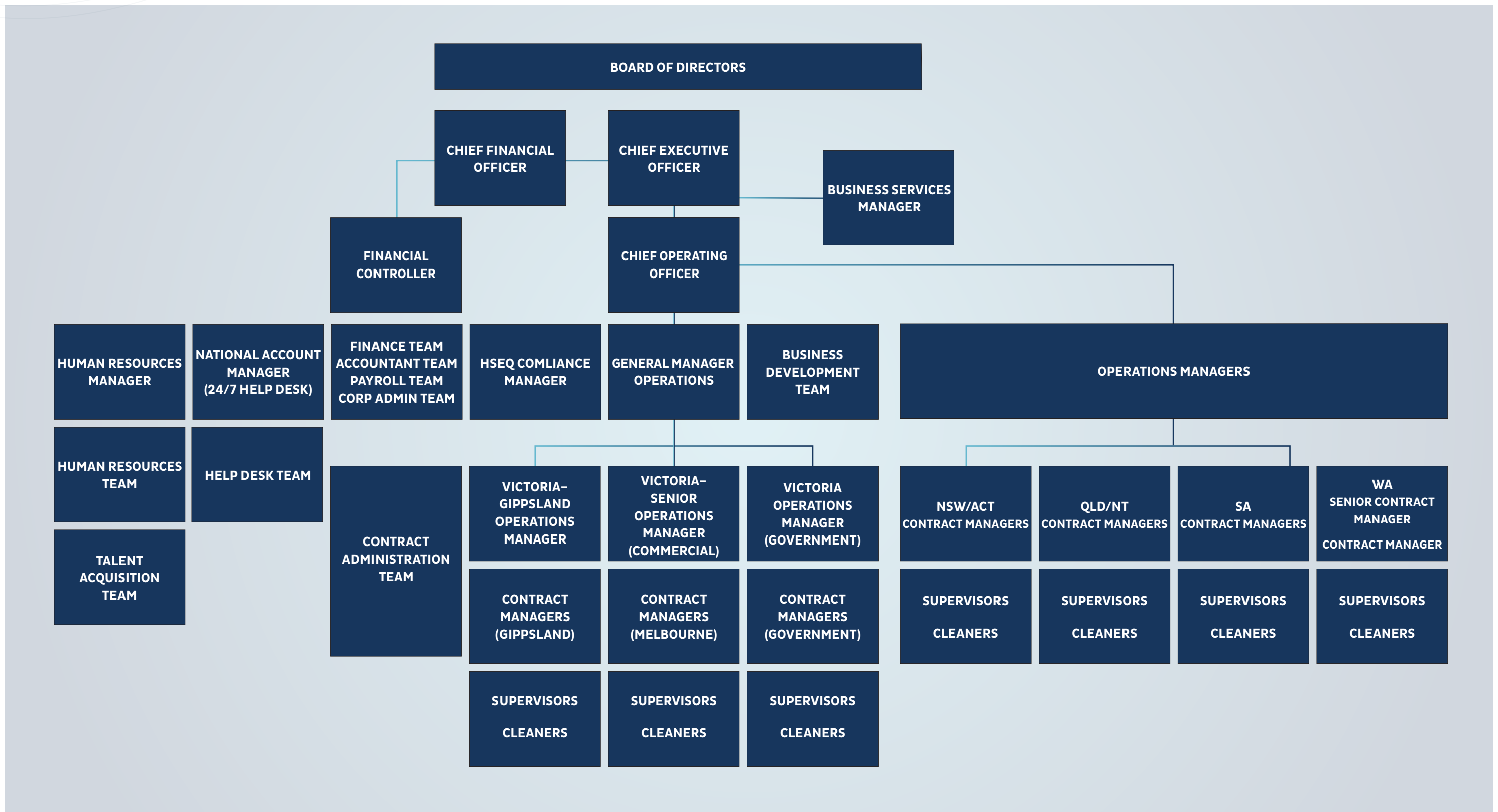


DELIVERING OVER
3.3M MAN HOURS
ACROSS A 12-MONTH PERIOD

DELIVERING SERVICES ACROSS
5.2M SQM
ACROSS THE COUNTRY

DELIVERING SERVICES TO
OVER 1145
CLIENT SITES

MENZIES ORGANISATIONAL STRUCTURE



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COMPLIANCE AUDITS AND CERTIFICATIONS

Menzies participate in internal and external audits to verify our its main entity's (located at 1-11 Glenferrie Road, Malvern VIC 3144) compliance to the standards ISO 9001 (Quality Management), ISO 14001 (Environmental Management) and ISO 45001 (WHS Management); with our external audits carried out annually, at minimum, by an independent third-party SAI Global.

The audits were last undertaken from 25 to 28 March 2024 with the objective to confirm that Menzies integrated management system [MMS] complies with the applicable elements of the Standard(s) and to confirm the organisation complies with its own policies and procedures. Furthermore, the audits were undertaken to confirm Menzies' integrated management system is suitable and effective for the organisation and does enable Menzies' clients to achieve their own objectives.

In addition, the company's payroll and related functions are subject to financial audits (at least annually) by KPMG.

Menzies confirm that the organisation has not received any non-conformances or adverse findings within any of these audits. For the purposes of this exercise, we have included all external audit reports, mentioned above.

Full details, including dates and audit outcomes, are indicated within the supporting attachments provided.

MENZIES POLICIES AND PROCEDURES TO IDENTIFY, INVESTIGATE AND REMEDY THE RISKS AND ANY INSTANCES OR MODERN SLAVERY WITHIN THE COMPANY

Menzies Modern Slavery Policy addresses our ability to identify, investigate and remedy the risk and any instances of modern slavery which has been articulated within our risk management procedure and policy statement.

Menzies conducts supplier and subcontractor assessment checks which includes the assessment of the supplier or subcontractor agreement prior to be onboarded with Menzies. Additionally, Menzies as part of our internal auditing process we check for full compliance to these guidelines on a regular basis.



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TRAINING MENZIES WILL PROVIDE TO ITS EMPLOYEES SERVICING THE CLIENT CONTRACT ADDRESSING MODERN SLAVERY ISSUES

Menzies has developed tailored training regarding the risk of modern slavery which is delivered to our internal stakeholders, suppliers and subcontractors.

It is delivered to all internal staff at a minimum of once per year to ensure any updates in legislation are covered and it is delivered to all new suppliers and subcontractors at onboarding stage and they are also subject to refresher trainings delivered at a minimum once per year.

MENZIES WILL TRAIN STAFF ABOUT MODERN SLAVERY UTILISING ITS INTERNAL LEARNING MANAGEMENT SYSTEM [LMS] COVERING THE FOLLOWING TOPICS:

1. What is Modern Slavery
2. Forms of Modern Slavery
3. The significance of Modern Slavery
4. Current Regulations and Laws in Australia
5. How you can help to prevent and report if you have concerns

The training will be rolled out in week 3 after the client contract start.

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MENZIES DUE DILIGENCE FOR MODERN SLAVERY RISKS ON ITS SUPPLIERS

Menzies conducts supplier and subcontractor assessment checks which includes the assessment of the supplier or subcontractor prior to be onboarded with Menzies. Additionally, as part of our internal auditing process Menzies will check for full compliance to these guidelines on a regular basis.

MENZIES EXPECTATIONS FOR ITS SUPPLIERS TO CONDUCT DUE DILIGENCE FOR MODERN SLAVERY RISKS ON THEIR SUPPLIERS

All engaged suppliers are obliged to have their supply chain checked prior to the commencement of being awarded any work with Menzies. We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have a supply chain compliance program in place.

As part of the onboarding process for our subcontractors and supplier partners they are all required to pledge their commitment to the ETI Base Code Guidelines which covers modern slavery risks; additionally; the supply chain is regularly audited to ensure compliance to this aspect of supply chain management.

Menzies also has several policies which address the supply chain processes for our suppliers and subcontractors as attached to this response.

FURTHERMORE, MENZIES ALREADY HAS THE FOLLOWING ITEMS IN PLACE TO ENSURE ONGOING COMPLIANCE WHICH INCLUDES BUT IS NOT LIMITED TO:

- **Legally written and reviewed subcontractor/supplier agreements which include compliance to anti-slavery requirements**
- **Subcontractor Management System**
- **Annual subcontractor/supplier audits which take place**



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ACTIONS MENZIES WOULD TAKE IF MODERN SLAVERY PRACTICES WERE SUSPECTED

Where modern slavery practices are suspected, and if the concern or allegation is determined to be legitimate, Menzies will work closely with relevant authorities the appropriate stakeholders internally and within its supply chain to develop and implement a plan to action contractual remedies to reduce any harm already caused and to minimise risks of recurrence.

Where severe breaches would be identified and remediation is not sufficient to eradicate modern slavery issues, the supplier alternative supply chains may be reviewed and implemented within the client contract.

Menzies ensures that all measures are taken to mitigate risks of modern slavery; staff are trained to know what to do when or if unlawful activity would be suspected.

Menzies training includes guides and information how to act and what to keep in mind to ensure no further harm to a victim or survivor of Modern Slavery would be caused. All staff members are encouraged to raise any concerns by following the below guide:

RECORD AND RAISE THE ISSUE

- **Record the complaint or concern regarding modern slavery allegations**
- **In emergencies, where there is immediate danger, or where the situation involves a child, call Triple 0 (000).**
- **Inform your line manager or higher management and include as many details as possible but always maintain privacy and confidentiality of any potential victims**

MENZIES COMPLIANCE WITH THE UNITED NATIONS ILO CONVENTIONS

Menzies diligently checks the identity of all staff prior to the commencement of being onboarded into the business. Additionally, all engaged subcontractor partners have their staff checked prior to the commencement of being awarded any work with Menzies and any staff which they wish to engage are also checked using the same processes.

As part of the onboarding process for our subcontractors and supplier partners they are all required to pledge their commitment to the ETI Base Code Guidelines which, amongst others, prohibits child labour; additionally, the supply chain is regularly audited to ensure compliance to this aspect.



MENZIES MODERN SLAVERY STATEMENT

Menzies Modern Slavery Statement includes the processes of the Supply Chain together with our risk management procedure and the supply chain training, and it also addresses all forms of forced labour, bonded labour and human trafficking in its operations and in those of its suppliers.

The company does and will never retain any original identity related documents of any of its employees.

Menzies does neither request for any of its employees to lodge security deposits nor does the company deduct wages, impose monetary fines and/or withhold pay entitlement.

All recruitment documents are retained by the organisation in accordance with required legislation and no employee is required to pay any monies at any stage within the recruitment process at Menzies. Menzies payroll operations are in accordance with the Fair Work Act. This is also verified and checked with the company's suppliers and subcontractors.

Menzies Facility Services are now a CAF Prequalified Contractor! CAF Contractor Prequalification verifies that our management systems, policies and procedures are correctly set up to meet the CAF 3 Star Standard – a compliance framework focused on ensuring fair labour practices, safe working conditions, and a voice at work for cleaners.

CAF Prequalification is a significant achievement that signifies Menzies' commitment to upholding fair and ethical standards in its cleaning operations.

The company is using an online recruitment system which incorporates a written contract in a language its employees understand, where terms of employment including wage rates and hours of work are clear and the relevant position description for each employee is included. Menzies employees are paid their legal pay entitlements, on time and are provided with pay slips which are clearly showing wage calculations and details of any deductions.

The company is fully compliant with its obligations under the Commonwealth workplace relations legislation, Industrial instrument, Fair Work Act 2020, Fair Work Regulations, Workplace Authority (Fair Work Commission), Long Service Leave Act, Annual Holidays Act and other related statutory requirements.

Menzies employees are free to lawfully resign from the organisation without any restriction or penalty.

MENZIES MECHANISMS TO RAISE CONCERNS RELATED TO LABOUR CONDITIONS OR WORKPLACE GRIEVANCES

Menzies provides access to a HR Hotline which can be reached out to by calling a free 1800-number contactable 24/7. In addition, Menzies' Whistleblowing Policy provides a supportive work-relationship environment where wrongdoing within or by Menzies can be raised and appropriately managed, without fear of retribution.

Menzies recommend that employees share their questions, concerns, suggestions or complaints with their supervisor in the first instance. If they are not comfortable speaking with their supervisor or they are not satisfied with their supervisor's response, they are encouraged to speak with the Human Resources Manager.

Supervisors and managers are required to report complaints or concerns in writing to the Human Resources Manager, who then must investigate all reported complaints and concerns.

Employees with concerns or complaints may also submit them in writing directly to their supervisor or the Human Resources Manager.

FURTHER STEPS IF MENZIES WAS TO BE AWARDED

Following a review of the effectiveness of the above, we will again audit our main suppliers who will be used in this contract to ensure that there is no slavery or human trafficking in our supply chain and take the following steps to combat slavery and human trafficking further:

- > Enhance our Group supplier agreements to better capture our commitment to managing human rights/modern slavery risks;
- > Improve relevant Group policies to include specific references to modern slavery;
- > Enhance due diligence processes for supplier selection and screening to include consideration of modern slavery risk;
- > Incorporate human rights / modern slavery awareness training to all Menzies employees;
- > Ensure any potential or actual concerns or issues are managed in accordance with our Corrective Action Policy and procedures;
- > Commence a review of first-tier suppliers assessed as having an elevated risk; and
- > Develop a set of key performance indicators to identify and measure how effective we have been in ensuring that modern slavery and human trafficking is not taking place across our business or supply chains.



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MODERN SLAVERY RISK IDENTIFICATION, ANALYSIS AND RESPONSE MEASURES

SOURCE OF RISK – PLANNING, EMPLOYEE ONBOARDING AND CONTRACT SET-UP Definition: The potential risks the organisation is exposed to prior to the start-up of the client contract

RISK TO CONTRACT MANAGEMENT	POTENTIAL CONSEQUENCES	RISK LEVEL	RESPONSE/ACTION MEASURE	RESOURCES	RESPONSIBILITY
FAILURE TO CORRECTLY CONSTRUCT EMPLOYMENT OFFERS TO NEW CLEANERS, RECEIVE CONFIRMED ACCEPTANCE/ REJECTIONS, AND DISTRIBUTE FORMAL EMPLOYMENT CONFIRMATIONS	Vulnerable staff being exposed to exploitation Inadequate staffing to fulfil contract requirements	Moderate	Menzies has partnered with FlareHR which is an electronic onboarding system that the employee completes themselves. This system is linked to our electronic recruitment management system which once the applicant applies for a position and is deemed successful the applicant is sent an automated email and text message which assists the employee complete the onboarding process electronically FlareHR is also automatically linked to our payroll system and is updated once they have completed their onboarding process. The system forces compliance as the employee cannot proceed to the next step until all tasks have been completed incl: Police Check, WWCC, review of policies and procedures etc. All information is electronic including documents such as the tax file form. There is a live and interactive help function which can assist the employee through the process.	FlareHR software platform Human Resources Department and Key selected contract management staff	Human Resources Department
INCOMPLETE OR INACCURATE PERSONNEL RECORDS COMPROMISE ISSUING CORRECT JOB OFFERS, AND GIVE RISE TO PRE-EMPLOYMENT DISPUTES AND/OR RESULT IN INCORRECT SERVICE CONTINUITY DATA	Vulnerable staff being exposed to exploitation Inadequate staffing to fulfil contract requirements	Moderate	As Menzies has employed a software to assist in this process it will be almost impossible to miss any area of the onboarding process as it will be automatically completed by the employee with prompts from the system when something is missing or forgotten. All employee information is populated by the employee directly and is automatically worked into our payroll system for generation.	Employee listing including contact details, location, and standard hours Labour plans	Human Resources Department
INCORRECT IMPLEMENTATION OF CONTRACT REQUIREMENTS (INCLUDING CHILD PROTECTION GUIDELINES – I.E. WORKING WITH CHILDREN CHECKS, CRIMINAL RECORDS CHECKS, ETC.)	Failure to fulfil contract requirements Inadequate staffing to fulfil contract requirements Breach of the contract	High	Arrange ongoing briefing sessions with operations Meetings addressing Contract requirements Monitor delivery of service to verify compliance Organise focus group meetings for contract managers to discuss issue trends to be resolved Ensure no person is employed without employment screening as required under the act. Ensure all candidates for employment complete the “Working with Children Check” designed by the Commission for Children and Young People, which requires completion of the “Prohibited Employment Declaration	Contract documentation Contract cleaning specifications IR Management Strategy IR Plan Site labour plans Management Systems Manual Human Resource Manual WH&S Management System	Human Resources Department Contract Administration Operations Manager Client Services Manager HSEQ & Compliance Manager
POTENTIAL HARM TO STAFF ARISING OUT OF WORKPLACE INJURIES DUE TO INADEQUATE TRAINING	Vulnerable staff being exposed to exploitation Inadequate staffing to fulfil contract requirements	Moderate	Manage WH&S systems closely Focus on adequate training and potential rehabilitation for early return to work of injured employee Focus on injury prevention strategies	Manage the WHS process in accordance with our certification of ISO45001 Engage our broker Gow Gates to ensure successful transition of this contract	Human Resources Department HSEQ & Compliance Manager Transition Manager
ATTENDANCE OF NEW EMPLOYEES FOR INDUCTION TO SITE	Staff not correctly trained to meet requirements set under contract for site induction including awareness of Modern Slavery risks	Moderate	Training packages will be developed for the general Contract Management team which will be used as a guide and template for the Management team to deliver to all staff prior to their first shift. All Supervisors and Leading Hands will be invited to a ‘train the trainer’ session and will be assisting in the successful on-site induction process.	Training pack Training room for train the trainer sessions Invitation to all supervisors and leading hands	Human Resources Department Transition Manager Operations Manager Contract Management team

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RISK TO CONTRACT MANAGEMENT	POTENTIAL CONSEQUENCES	RISK LEVEL	RESPONSE/ACTION MEASURE	RESOURCES	RESPONSIBILITY
EMPLOYMENT OF STAFF WHO ARE NOT TECHNICALLY SAVVY AND EXPERIENCE ISSUES WITH THE APPLICATION AND/OR ONBOARDING PROCESS WITH MENZIES;	Vulnerable staff being exposed to exploitation Insufficient staffing number who will be able to apply for a position which will result in staffing shortages for contract commencement	Moderate	Provide resources available for the application of employment with Menzies. Ensure that all Menzies office locations are set up with computers and trained competent staff to assist In regional areas there will be site locations hired and set up for staff who require assistance to attend to assist with the application and onboarding process	Computers and staff available to assist with the application and onboarding process Hiring of meeting locations in regional areas	Human Resources Department Transition Manager Operations Manager Contract Management team
HIGH DEMAND FOR MIGRANT AND BASIC SKILLS STAFF; LANGUAGE BARRIERS MAY POSE RISK FOR EMPLOYMENT DOCUMENTATION AND ONBOARDING TO BE PERCEIVED AS DECEPTIVE RESULTING IN ISSUES WITH THE APPLICATION AND/OR ONBOARDING PROCESS WITH MENZIES;	Vulnerable staff being exposed to exploitation Insufficient staffing number who will be able to apply for a position which will result in staffing shortages for contract commencement	Moderate	Offer translation resources for the application of employment with Menzies. Ensure that all contract locations are set up with multi-lingual speaking staff In regional areas there will be site locations hired and set up for staff who require further assistance	Translation services available to assist with the application and onboarding process Hiring of meeting locations in regional areas	Human Resources Department Transition Manager Operations Manager Contract Management team
COMPLIANCE OF SUBCONTRACTORS TO CONTRACT AND STATUTORY REQUIREMENTS	Failure to fulfil contract requirements Exploitation of vulnerable staff	High	Basic conditions of employment: Recognition of statutory legislative compliance Potential for alternate job offer At a minimum annual audits Menzies and contractor supply chains Update of internal policies and procedures where necessary Establish client specific supply chain audit plans Raise modern slavery awareness by continually rolling out refresher trainings including review of supply chains	IR Strategy Legislation and Regulations Planned and unplanned audits Procurement policies review and updates Modern Slavery awareness information sheets Supplier code of conduct	Human Resources Department Contract Administration Operations Manager Client Services Manager HSEQ & Compliance Manager
NON-ADHERENCE TO MODERN SLAVERY AND REPORTING REQUIREMENT	Increased potential for vulnerable workers to be exploited Absenteeism due to modern slavery incidents	High	Structured training to be delivered to new package contract managers and supervisors: > Modern Slavery awareness > risk management > how to report modern slavery Structured training to be delivered to new cleaning staff: > Modern Slavery awareness > risk management > how to report modern slavery	Modern slavery awareness training Workplace Injury Management Manual Safe Work Method Statements Site Specific Safety Induction	Human Resources Department Contract Administration Operations Manager Client Services Manager HSEQ & Compliance Manager

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MODERN SLAVERY RISK IDENTIFICATION, ANALYSIS AND RESPONSE MEASURES

SOURCE OF RISK – CONTRACT DELIVERY Definition: The potential risks the organisation and staff are exposed to in the operational management following the go-live of the client contract

RISK TO CONTRACT MANAGEMENT	POTENTIAL CONSEQUENCES	RISK LEVEL	RESPONSE/ACTION MEASURE	RESOURCES	RESPONSIBILITY
ADHERENCE OF LEGISLATIVE AND STATUTORY REQUIREMENTS	<p>Incorrect payment of staff</p> <p>Potential industrial action.</p> <p>Inadequate staffing to fulfil contract requirements</p>	High	<p>Ensure adequately trained resources are available</p> <p>Checking prepared payroll variations to be carried out</p> <p>Payroll audit to be implemented quarterly</p>	<p>IR Strategy</p> <p>IR Legislation and Regulations</p>	<p>Human Resources Department</p> <p>Administration Manager</p> <p>Payroll Manager</p> <p>Payroll Officers</p>
STAFF INADEQUATELY TRAINED; LANGUAGE BARRIERS	<p>Vulnerable staff being exposed to exploitation</p> <p>Failure to fulfil contract requirements</p>	High	<p>Ensure on-the-job (informal) training carried out by management staff</p> <p>Sign up new staff to traineeships</p> <p>Deliver structured training to non-trainees in accordance with national competencies</p> <p>Verify adequacy of supervisor training</p> <p>Ensure translation services are available to maximise training outcome</p>	<p>Menzies onboarding documentation on FlareHR</p> <p>Menzies Induction [face to face and online] (including OHS Site Specific Inductions)</p> <p>Contract Cleaning Specifications</p> <p>Modern slavery awareness training</p>	<p>Human Resources Department</p> <p>HSEQ & Compliance Manager</p> <p>Operations Manager Client Services Manager</p> <p>Operation Manager</p> <p>Contract Managers</p> <p>Supervisors</p> <p>Administration Manager</p>
MENZIES ONLINE AND ON-SITE TRAININGS	<p>Language barriers resulting in misunderstanding</p> <p>Safety concerns</p> <p>Undermining integrity of client and Menzies</p> <p>Staff not properly trained to meet requirements set under contract for site induction including awareness of Modern Slavery risks</p>	High	<p>Ensure there is a platform in place to where no staff can commence on site without having completed a Menzies induction which includes all relevant policies, procedures and safety awareness</p> <p>Menzies have partnered with a Learning Management System provider to develop a modern, easy to use platform that addresses company and workplace compliance</p> <p>The LMS also aligns to the VIC Education Sector.</p>	<p>Online LMS</p> <p>Learning & Development platforms</p> <p>Field Training Checklist [FTC]</p> <p>Modern slavery awareness training</p>	<p>Human Resources Department</p> <p>HSEQ & Compliance Manager</p> <p>Contract Management</p> <p>Administration</p>
CLIENT SITE SPECIFIC TRAININGS	<p>Language barriers resulting in misunderstanding</p> <p>Safety concerns</p> <p>Undermining integrity of client and Menzies</p>	High	<p>Development of individual and site-specific training plans covering contractual and general cleaning tasks</p> <p>Provision of translation services</p> <p>Client annual training sessions to increase awareness</p> <p>Ensure staff have access to commence and refresh their trainings; Ensure staff have completed the client specific inductions work commencement</p>	<p>Online LMS</p> <p>Learning & Development platforms</p> <p>Menzies and client</p>	<p>Human Resources Department</p> <p>HSEQ & Compliance Manager</p> <p>Contract Management</p>

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RISK TO CONTRACT MANAGEMENT	POTENTIAL CONSEQUENCES	RISK LEVEL	RESPONSE/ACTION MEASURE	RESOURCES	RESPONSIBILITY
ADEQUATE HUMAN RESOURCES AVAILABLE	Inability to fulfil contract Requirements Vulnerable staff being exposed to exploitation	Moderate	Accept the risks and manage Ensure that the companies succession planning process and talent pooling process is being followed to ensure successors of job ready now candidates are being escalated through the ranks Ensure staff have continual HR support Ensure vulnerable staff are adequately trained and made of their rights in accordance with Human Resources legislation and the Modern Slavery Act 2018	Sufficient HR support availability throughout the contract Client contract set-up in Payroll system External payroll course (where required) On-the-job training by payroll manager	Human Resources Department Administration Manager National Payroll Manager Payroll Officers
CAPACITY TO MEET STATUTORY EMPLOYMENT LIABILITIES AND EMPLOYEE ENTITLEMENTS ON TERMINATION	Potential industrial action Vulnerable staff being exposed to exploitation Inadequate staffing to fulfil contract requirements	High	Accept the risks and manage	IR Strategy IR legislation and Regulations	Human Resources Department Payroll department
FLEXIBLE EMPLOYMENT CONTRACTS	Inability to adequately offer a flexible working environment Inability to create a workforce which will ensure maximum flexibility for the client, Menzies and employees [ensuring maximum efficiency]	Low	Ensure the needs of the contract, employee and client are fully understood so maximum flexibility can be provided to all employees	IR Strategy IR legislation Individual Flexibility Agreements [IFA]	Human Resources Department
EMPLOYMENT OF NON- ENGLISH SPEAKING EMPLOYEES	Incorrect completion of contract requirements due to language and cultural barriers Vulnerable staff being exposed to exploitation Perceived deception regarding tasks / work requirements Non-adherence to WHS requirements which could result safety issues Non-adherence of Menzies' policies and procedures	Low	Ensure multi-lingual translations are available of key Policies, Procedures and Practices New contract managers and supervisors to receive proper induction training Deliver proper induction training to cleaning staff Provide timely communication to the new workforce via electronic newsletters and additional training opportunities Verify adequate IR expertise is available to support Menzies and potential contractors	Language Triggers to be included on all correspondence Communication strategies and training packs Information sheets	Human Resources Department Contract Administration Operations Manager Contract Managers Client Services Manager HSEQ & Compliance Manager

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RISK TO CONTRACT MANAGEMENT	POTENTIAL CONSEQUENCES	RISK LEVEL	RESPONSE/ACTION MEASURE	RESOURCES	RESPONSIBILITY
SKILL DEFICIENCIES IN MANAGEMENT STAFF	Poor industrial relations which could result in industrial conflict/ disputes	Moderate	Provide ongoing training and retraining to reiterate and reconfirm the correct techniques and information to be adopted Company has introduced a management leadership development program whereby all management attend a session which leads to a nationally recognised Diploma in Leadership	Contract document Contract cleaning specifications IR Management Strategy Project IR Plan Site labour plans QA Reports Management Systems Manual Human Resource Manual WH&S Management System	Human Resources Department Contract Administration Operations Manager Contract Managers Client Services Manager HSEQ & Compliance Manager
COMPLIANCE OF SUBCONTRACTORS TO CONTRACT AND STATUTORY REQUIREMENTS	Failure to fulfil contract requirements Exploitation of vulnerable staff	High	Basic conditions of employment: Recognition of statutory legislative compliance Potential for alternate job offer At a minimum annual audits Menzies and contractor supply chains Update of internal policies and procedures where necessary Establish client specific supply chain audit plans Raise modern slavery awareness by continually rolling out refresher trainings including review of supply chains	IR Strategy Legislation and Regulations Planned and unplanned audits Procurement policies review and updates Modern Slavery awareness information sheets Supplier code of conduct	Human Resources Department Contract Administration Operations Manager Contract Managers Client Services Manager HSEQ & Compliance Manager
NON-ADHERENCE TO MODERN SLAVERY REPORTING REQUIREMENT	Increased potential for vulnerable workers to be exploited Absenteeism due to modern slavery incidents	High	Structured training to be delivered to new package contract managers and supervisors: > Modern Slavery awareness > risk management > how to report modern slavery Structured training to be delivered to new cleaning staff: > Modern Slavery awareness > risk management > how to report modern slavery	Modern slavery awareness training Workplace Injury Management Manual Safe Work Method Statements Site Specific Safety Induction	Human Resources Department Contract Administration Operations Manager Contract Managers Client Services Manager HSEQ & Compliance Manager

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MODERN SLAVERY RISK IDENTIFICATION, ANALYSIS AND RESPONSE MEASURES

SOURCE OF RISK – ORGANISATIONAL Definition: Awareness of risks associated with potential organisational deficiencies

RISK TO CONTRACT MANAGEMENT	POTENTIAL CONSEQUENCES	RISK LEVEL	RESPONSE/ACTION MEASURE	RESOURCES	RESPONSIBILITY
OPERATIONAL FAIRNESS OF LABOUR PLAN	<p>Decreased staff morale</p> <p>Failure to fulfil contract requirements</p> <p>Inadequate staffing to fulfil contract requirements</p> <p>Exploitation of vulnerable staff</p>	Moderate	<p>At induction training ensure:</p> <ul style="list-style-type: none"> > Duties are clearly defined in terms of specification requirement/Company grievance policies and procedures are addressed > Safe work methods training is delivered > Company policies and procedures are included <p>At the Enterprise level ensure:</p> <ul style="list-style-type: none"> > Adequate relevant training material is available > Necessary levels of expertise are available for delivery > Training material provided to participants 	<p>Contract documentation</p> <p>Contract cleaning specifications</p> <p>IR Management Strategy</p> <p>IR Plan</p> <p>Site labour plans</p> <p>Management Systems Manual</p> <p>Human Resource Manual</p> <p>WH&S Management System</p>	<p>Human Resources Department</p> <p>Contract Administration</p> <p>Operations Manager</p> <p>Contract Managers</p> <p>Client Services Manager</p> <p>HSEQ & Compliance Manager</p>
GRIEVANCES	<p>Industrial disputes</p> <p>Exploitation of vulnerable staff</p> <p>Decreased staff morale</p> <p>Failure to fulfil contract requirements</p> <p>Inadequate staffing to fulfil contract requirements</p>	High	<p>Develop training programs to ensure relevant expertise to handle grievance matters</p> <p>Menzies have a 1800 number where grievances can be escalated in a confidential manner and dealt with via trained and professional HR staff</p>	<p>HR Manual</p> <p>Grievance Record</p> <p>HRHotline</p> <p>Modern slavery awareness information sheets and training</p>	<p>Human Resources Department</p> <p>HSEQ & Compliance Manager</p> <p>Operations Manager Client Services Manager</p> <p>Operation Manager</p> <p>Contract Managers</p> <p>Supervisors</p> <p>Administration Manager</p>
PERSONAL AND PROFESSIONAL STRESS	<p>Physiological workers compensation claims</p> <p>Time off work</p> <p>Lost time injuries</p> <p>Absenteeism</p> <p>High turnover</p>	Medium	<p>Menzies have a dedicated HSEQ Management department who implement preventative solutions to the Operations team to identify and deal with these matters.</p> <p>Menzies have a free and confidential Employee Assistance Program [EAP] which is available to all staff and their immediate family</p>	<p>Wellbeing policy</p> <p>Injury Management team</p> <p>EAP service</p> <p>Modern slavery awareness information sheets</p>	<p>Human Resources Department</p> <p>HSEQ & Compliance Manager</p> <p>Operations Manager</p> <p>Contract Managers</p>

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RISK TO CONTRACT MANAGEMENT	POTENTIAL CONSEQUENCES	RISK LEVEL	RESPONSE/ACTION MEASURE	RESOURCES	RESPONSIBILITY
PERSONAL AND PROFESSIONAL STRESS	<p>Physiological workers compensation claims</p> <p>Time off work</p> <p>Lost time injuries</p> <p>Absenteeism</p> <p>High turnover</p>	Medium	<p>Menzies have a dedicated HSEQ Management department who implement preventative solutions to the Operations team to identify and deal with these matters.</p> <p>Menzies have a free and confidential Employee Assistance Program [EAP] which is available to all staff and their immediate family</p>	<p>Wellbeing policy</p> <p>Injury Management team</p> <p>EAP service</p> <p>Modern slavery awareness information sheets</p>	<p>Human Resources Department</p> <p>HSEQ & Compliance Manager</p> <p>Operations Manager</p> <p>Contract Managers</p>
FAILURE TO MANAGE INDUSTRIAL RELATIONS THROUGH EFFECTIVE CONSULTATION	<p>Industrial disputes</p> <p>Exploitation of vulnerable staff</p>	Moderate	<p>Ensure regular consultation meetings occur on work locations between management and employees</p>	<p>IR Strategy</p>	<p>Human Resources Department</p> <p>Contract Administration</p> <p>Operations Manager</p> <p>Contract Managers</p> <p>Client Services Manager</p> <p>HSEQ & Compliance Manager</p>
FAILURE TO TRAIN MANAGEMENT IN INDUSTRIAL RELATIONS THROUGH ONGOING MONTHLY OPERATIONS MEETINGS	<p>Industrial disputes</p> <p>Disharmony between management and employees</p>	Moderate	<p>Nominate adequate alternate industrial relations management resources in the event of substantial personnel being absent</p> <p>Ensure expertise of replacement is adequate for site specific tasks</p>	<p>HR Manual</p> <p>IR Strategy</p>	<p>Human Resources Department</p> <p>HSEQ & Compliance Manager</p>

MODERN SLAVERY

Risk Management Plan

MODERN SLAVERY

Risk Management Plan

Under the Corporations Act 2001 (Cth), Menzies is deemed a group, and Menzies International (Aust.) Pty Ltd is the common ultimate holding company.

We can confirm that this statement has been discussed with all companies we own or control including active engagement and consultation in the development of this statement. Details of the Modern Slavery Act 2018's reporting requirements as well as information regarding the actions we intend to take to address these requirements were provided to all companies of the group.

The statement was approved by the Board of Directors of the Menzies Group on 13 of June 2024 and was signed by the Chief Executive Officer, Greg Springall.



Greg Springall

Date: 17 June 2024

 [menziesgroup.com.au](https://www.menziesgroup.com.au)
Menzies International (Aust.) Pty. Ltd | ACN 004 967 757 | ABN 44 004 967 757



INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 24(2) of the Modern Slavery Act 2018 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2023/2024.

ORGANISATIONAL STRUCTURE

We are a provider of Commercial/Industrial/Government Cleaning in the Facility Services Industry. Menzies employs over 2,500+ employees today with operations across all major Australian cities and regional centers and have been operating since 1969.

Menzies provides end to end property management solutions to major government and private sector clients. Services include:

- Contract cleaning
- Property and specialist maintenance services
- Hygiene service
- Grounds Maintenance services
- Waste and environmental management services.

Menzies offers the flexibility and innovation that only a family business can provide. Servicing private and Government sectors, Menzies is dedicated to customer service and committed to expansion throughout Australia.

Menzies continues to evolve and expand in new markets through innovation and continuous improvement, measured against benchmarks for quality, safety & risk management, customer satisfaction and environmental sustainability.

Menzies provides end-to-end property management solutions Australia-wide and is flexible to meet customer needs. While the Menzies Group is ultimately overarched by the employing entity Menzies International [Aust] Pty Ltd, the following entities make up the 'Menzies Group':

Employer	ABN
Menzies Property Services Pty. Ltd.	99 005 585 197
Executive Payroll Systems Pty Ltd	37 068 266 375
Allcorp Property Services Pty. Ltd.	41 003 194 189
Executive Payroll Commercial Pty Ltd	16 077 858 765
Menzies International (Aust) Pty Ltd	44 004 967 757
Allcorp Services (Queensland) Pty Ltd	62 010 879 580
Allcorp Riverina Pty Ltd	92 080 548 625
Enterprise Contractor Services (Vic) Pty Ltd	91 083 159 693
Industrial Contractor Services (Vic) Pty Ltd	83 083 159 657
Industrial & Infrastructure Services (Vic) Pty Ltd	66 083 159 586
Executive Payroll Systems Pty Ltd	37 068 266 375

Menzies has a National annual turnover greater than \$100,000,000.

CEANING ACCOUNTABILITY FRAMEWORK

We are a CAF 3 Star prequalified contractor. The Cleaning Accountability Framework is committed to improving labour practices in the cleaning industry by working with all stakeholders in the supply chain – cleaners, tenants, contractors, property owners, facility managers, unions and investors. It is a guarantee for our staff and clients as to the legality and ethics of Menzies' operations.

OUR SUPPLY CHAINS

The equipment purchased through our supply chain includes [but is not limited to]:

- Cleaning Chemicals
- Company Vehicles
- Stationary
- Uniforms
- Information Technology Equipment
- Cleaning Equipment:
 - Vacuum cleaners
 - Floor polishers [both push and ride on]
 - Mop & Buckets
 - Electrical i.e.: power cords, adaptors, RCD's
- Consumables:
 - Toilet paper
 - Hand towel
 - Hand soap

With every new financial year, Menzies will be carrying out a supply chain mapping process and risk assessment in respect of our supply chain which will including obtaining statements of compliance with evidence against the Modern Slavery Act.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

- [Corporate Social Responsibility Policy](#)
- [ETI - Ethical Trading Initiative](#)
- [Code of Conduct Policy](#)
- [Anti-Bribery and Anti-Corruption Policy](#)
- [Procurement Policy](#)

Under no circumstances will cleaners, subcontractors or any employee be:

- Offered cash in hand for work performed, or
- Be required to pay cash back to their employer, or
- Receive any threats related to their immigration status in Australia.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance program.

Menzies already has the following items in place to ensure ongoing compliance against the Act which includes but is not limited to:

- Legally written and reviewed subcontractor/supplier agreements which include compliance to anti-slavery requirements
- Subcontractor Management System
- Monthly, Quarterly and Yearly subcontractor/supplier audits which take place

Additionally, Menzies will frequently review all current agreements and processes for dealing with subcontractors and suppliers to ensure ongoing compliance to anti-slavery measures.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Human Resources
- HSEQ and Compliance
- Sales
- Finance & Administration

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide intend to provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Enhance our Group supplier agreements to better capture our commitment to managing human rights/modern slavery risks;
- Improve relevant Group policies to include specific references to modern slavery;
- Enhance due diligence processes for supplier selection and screening to include consideration of modern slavery risk;
- Incorporate human rights / modern slavery awareness training to all Menzies employees;
- Ensure any potential or actual concerns or issues are managed in accordance with our Corrective Action Policy and procedures;
- Commence a review of first-tier suppliers assessed as having an elevated risk; and
- Develop a set of key performance indicators to identify and measure how effective we have been in ensuring that modern slavery and human trafficking is not taking place across our business or supply chains.

Authorised by:



Greg Springall
CHIEF EXECUTIVE OFFICER

Translation can be arranged through your Branch Office for staff with this need.

- **Spanish Translation:** Por intermedio de la Oficina Regional se puede organizar traducción el personal que la necesite.
- **French Translation:** traduction peuvent être organisés par le Bureau régional pour le personnel avec ce besoin
- **Italian Translation:** Una traduzione potrà essere eseguita attraverso l'ufficio regionale per il personale che dovesse averne bisogno.
- **Serbian Translation:** Превод се може организовати преко Регионалне канцеларије за особље коме је потребно.
- **Croatian Translation:** Prijevod se može organizirati preko Regionalnog ureda za osoblje kome treba.
- **Greek Translation:** Μετάφραση μπορεί να κανονισθεί μέσω του Περιφερειακού Γραφείου για προσωπικό που έχει αυτή την ανάγκη.
- **Macedonian Translation:** Превод на текстови може да се организира преку Регионалната канцеларија за персоналот кој има таква потреба.
- **Russian Translation:** Перевод может быть организовано через региональное отделение для сотрудников с этим необходимо
- **Finnish Translation:** käännös voidaan järjestää aluetoimiston henkilöstön tämän tarpeen
- **Thai Translation:** บริการ Regional Office
- **Arabic Translation:** مع هذه الحاجة كميون ترجمة مت هينترتا من لاخل كملاب يلقلامي للموظفين
- **Persian Translation:** میظننداب دیدشاپ زاین نیا نادنمراکی ارار یا فقط نم رتقد قیرط زا دناومی مه مجرت
- **Turkish Translation:** Çeviri Bölge Müdürlüğü personeli için aracılığıyla bu ihtiyacı ile ayarlanabilir
- **Filipino Translation:** pagsasalin Maaari Maging hagdang pamamagitan ng Regional Office para sa mga tauhan na ito kailangan
- **Indonesian Translation:** terjemahan Bisa Diatur Melalui Kantor Wilayah untuk staf dengan kebutuhan ini
- **Malay Translation:** penterjemahan Bisa Dikawal Melalui Pejabat Wilayah untuk kakitangan dengan keperluan ini
- **Swahili Translation:** Tafsiri unaweza ukapangwa kupitia Ofisi ya Mkoa kwa ajili ya wafanyakazi na hitaji hili
- **Afrikaans Translation:** Hāy bō trí có thē djich qua Vān phōng Khu vưc nhân viên có nhu cầu này
- **Vietnamese Translation:** Hāy bō trí có thē djich qua Vān phōng Khu vưc nhân viên có nhu cầu này
- **Japanese Translation:** hon'yaku wa , chiiki jimusho no sutaffu wotsujite, kono hitsuyō sei ni haichi suru koto ga deki masu
- **Chinese Translation (Traditional):** fān yì kě yì ān pái tōng guò qū yù bàn shì chǔ de gōng zuò rén yuán, zhè fāng miàn de xū yào
- **Chinese Translation (Simplified):** kě yì ān pái fān yì tōng guò qū yù bàn shì chǔ de gōng zuò rén yuán yù c