



Going Further Together

Modern Slavery
Statement

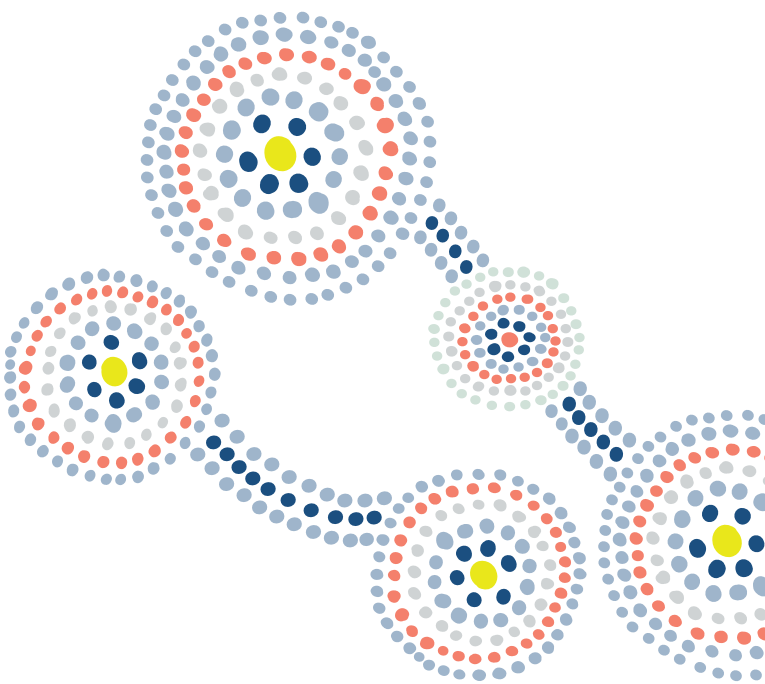
FY2024



Contents

About this Statement	1
A Message from our CEO	2
Our Progress at a Glance	3
About Us	4
Our Structure, Operations and Supply Chain	7
Our Commitment to Human Rights	9
Understanding Risks of Modern Slavery Practices in our Operations and Supply Chain	10
Actions Taken to Assess and Address our Modern Slavery Risks	15
Assessing the Effectiveness of our Actions	19
Next Steps and Other Relevant Information	20
Glossary	21

BIC Consolidated acknowledges the Traditional Owners of Country throughout Australia and recognise their continuing connection to the land, waters and communities in which we live, work and play. We pay our respects to them and their cultures, and to Elders past and present.



About this Statement

The content of this Statement has been prepared based on the mandatory reporting criteria for Modern Slavery Statements set out in the *Modern Slavery Act 2018* (Cth). This statement includes reference to actions undertaken prior to the FY24 reporting period to provide relevant context for our actions during the FY24 year.

This Modern Slavery Statement is submitted as a joint statement and outlines the ongoing actions to minimise the risk of modern slavery in our operations and supply chain for the financial year ending 30 June 2024 (FY24), for the following entities:

- BIC Services Pty Ltd (ABN 40 003 700 301)
- Consolidated Property Services (Australia) Pty Ltd (ABN 60 164 974 814)

BIC Services Pty Ltd (BIC) and Consolidated Property Services Pty Ltd (CPS) are part of the Bidvest Group of Companies and sit within Bidvest Group Australia Pty Ltd (ABN 62 659 193 030). During FY24, BIC and CPS were merged under one single operating entity BIC Services Pty Ltd (ABN 40 003 700 301), trading as BIC Consolidated.

The Board is responsible for the governance of BIC Consolidated and oversee the governance structure including policies and procedures, risk management and compliance framework and environmental, social and governance (ESG) strategy and approach. The Senior Management team of BIC Consolidated, as well as representatives of Bidvest, have received a draft of this Modern Slavery Statement for review and comment, prior to publication.

This statement was approved by The Board on 20 December 2024.



A Message from our CEO

While global awareness of modern slavery is rising, the challenges persist and human rights abuses continue to grow. We recognise our role in addressing this crisis and remain resolutely committed to addressing these critical issues within our operations and supply chains.

This Statement marks a significant milestone in our ongoing commitment to combat modern slavery as the first Statement for the BIC Consolidated business. It reflects a coming together of two businesses that both had a strong focus on modern slavery risk management and demonstrates a continued commitment to improvement in business process and policies. The Statement highlights the actionable steps we're taking to prevent human rights abuses in our operations and supply chain.

Our acquisition by Bidvest Group Limited continues to see us participate in joint initiatives across the Group, including sharing best practices and enhancing supplier monitoring systems. Our leadership team is also actively involved in shaping policies that protect the rights of the most vulnerable, ensuring that human rights are central to every decision, from procurement to employee treatment.

Collaboration plays an important role in our approach and has led to the development of new tools and strategies for identifying and addressing modern slavery risks. Partnerships such as our on-going participation in the United Nations Global Compact (UNGC), enable us to refine our modern slavery risk assessment approach and learn about and

adopt best practice actions and initiatives. The ten UNGC Principles provide a solid foundation for our integrated Environmental, Social and Governance (ESG) strategy.

Holding ourselves to account and being transparent about performance is critical. Our continued participation in the Cleaning Accountability Framework (CAF) sees us remain focused on ensuring a high standard of working conditions for our team members, providing fair pay, appropriate training, and a safe and welcoming work environment that ensures no exploitation of our people occurs in the buildings where we provide cleaning services.

We are committed to not only eradicating modern slavery within our operations but also to working closely with our partners, suppliers, and customers to drive meaningful, lasting change across the entire supply chain. We continue to critically examine our supply chain practices, with targeted strategies to identify, assess, and mitigate modern slavery risks. Our zero-tolerance policy is enforced through such actions as a clear communication of our expectations, risk assessments, regular audits, anonymous reporting channels for employees and suppliers, and a robust response framework.

While no instances of modern slavery were identified in our operations or supply chain during the reporting period, we recognise that these risks can be hidden. We invite our stakeholders, including suppliers, customers, and industry partners, to join us in this fight against modern slavery. Together, we can make a tangible and lasting impact on the global effort

to eliminate exploitation from all corners of the property sector.

Together, we can build a future free from exploitation. We can go further, together.



A handwritten signature in black ink, appearing to read 'Tony Gorgovski'.

Tony Gorgovski
CEO BIC Consolidated

Our Progress at a Glance

Key actions in FY24:

- Reviewed and enhanced our Human Rights Policy and Whistleblower Policy.
- Continued to engage and educate our people, delivering Modern Slavery training, leveraging UTS Modern Slavery resources.
- Commenced CAF (Contractor) prequalification of the BIC Consolidated business. Continued to partner with our customers on 14 CAF Building Certifications.
- Merged BIC and CPS supplier databases and completed a comprehensive significant supplier assessment, categorising each supplier category A – E, which determines the level of focus on, and management of, that supplier.
- Implemented a refreshed Supplier Management System which mandates all category A & B suppliers be registered on the CM3 platform and subject to enhanced due diligence procedures and acknowledge the Bidvest Code of Ethical Purchasing.
- Engaged Workplace Wizards to complete audits of two Category A suppliers with a focus on pay and employment conditions.

"A comprehensive, all-business response is necessary to address modern slavery."

.....

Tony Gorgovski
CEO BIC Consolidated

About Us

In 2024 BIC Services and Consolidated Property Services came together as one – BIC Consolidated. We are committed to:



**Strong
Customer Focus**



**Forward Thinking
Innovation**



**Seamless
Service**



**People-first
Culture**



**Locally
Operated**

Since 1989, BIC has been dedicated to building strong, lasting connections between their customers, tenants and their people. This has helped BIC grow a prestigious portfolio of customers across Australia, investing in technology and innovation to revolutionise the cleaning industry with real-time data analytics and service performance that supported their goal of creating sustainable, communities and a brighter future for everyone. With a focus on their people, their development, skills and reward and recognition, BIC became positioned as a highly regarded employer of choice in the Australian service supplier industry.

As a family-owned business, CPS have been creating healthy and safe environments across the office, retail and education industries since 1977. With a focus on people, partnership and quality service, routinely exceeding customer expectations everyday through relentless performance and the positive contribution of their exceptional teams.

The two businesses were strongly aligned in their governance and ethical cultures, their delivery of reliable and high-quality cleaning services, and their unwavering commitment to their people and customers. The new merged entity will protect these values, while also benefiting from economies of scale which will allow us to provide more efficient, sustainable, reliable and innovative services.

Our Focus on ESG and the SDGs

Our ESG Strategy is unpinning by the United Nations' 17 Sustainable Development Goals (SDGs) as we recognise their significance in driving change to address global challenges, including poverty, inequality, climate change, environmental degradation, peace, and justice, to create a more sustainable, equitable, and prosperous world by 2030. We are fully dedicated to advancing them through concrete actions. We have prioritised six key SDGs where our business can make the greatest impact, with Goal 8 being directly aligned with our efforts to combat modern slavery. This Statement outlines our initiatives to raise awareness, understand the risks of modern slavery, and implement meaningful actions within our business to address these challenges and drive progress towards this goal.

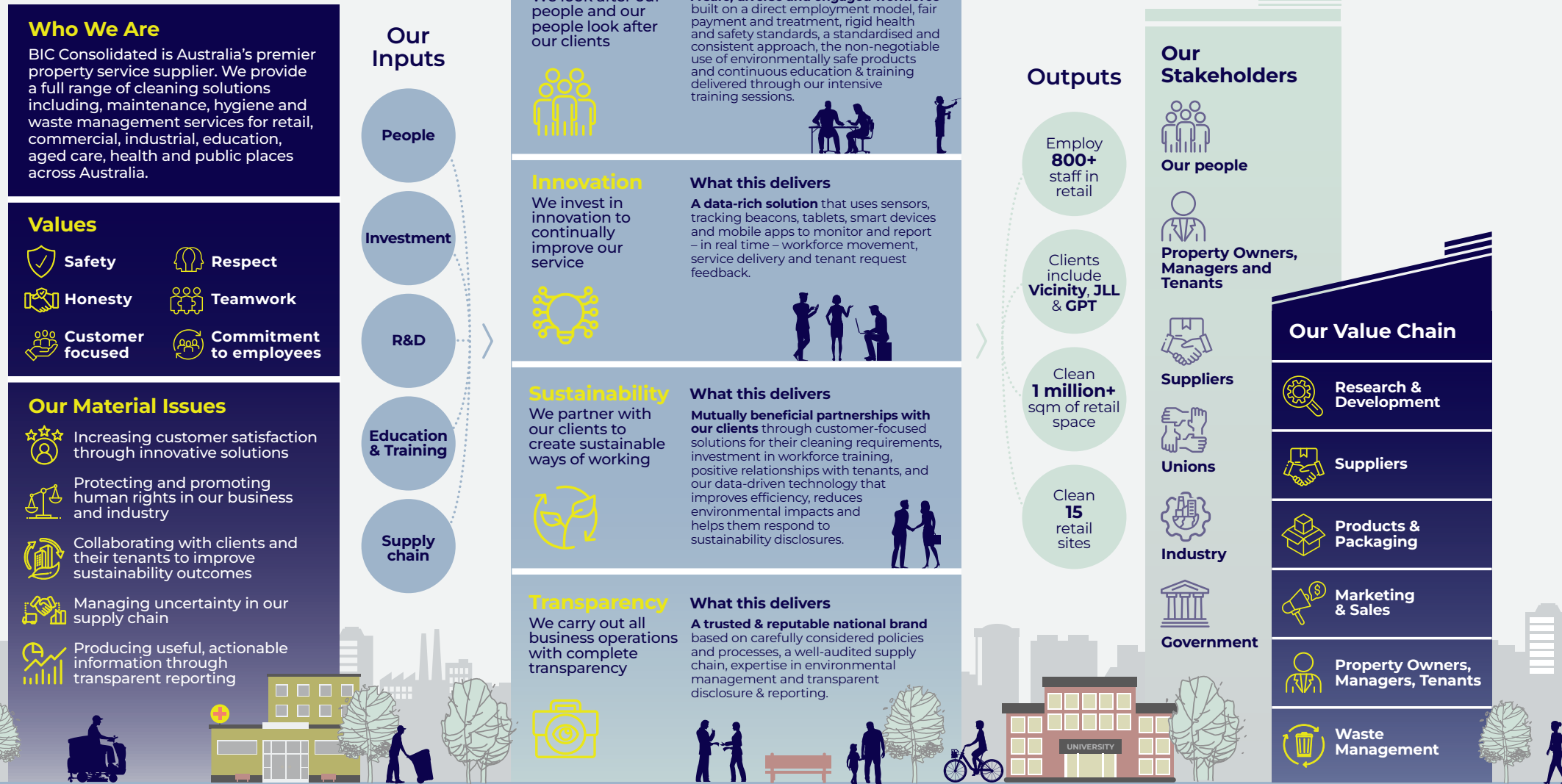


How We Create Value

Our Purpose

Transforming the property service industry and the people who work within it.

Our Strategic Pillars



Our Structure, Operations and Supply Chain

Bidvest Group Limited acquired BIC in July 2022, and then acquired CPS in October 2023. These two leading cleaning companies have then come together to form BIC Consolidated. Bidvest was founded in 1988 and listed on the Johannesburg Stock Exchange in 1990 and is a leading South African group with over 250 individual business, employing more than 130,000 people in South Africa, the United Kingdom, Ireland, Spain, Australia and Singapore.

As our parent company, Bidvest sets the tone and leads a strong anti-modern slavery stance. We have been able to leverage their legal and ethical expertise and have adopted the Bidvest Code of Ethical Purchasing which sets out clear expectations for how we work with our business partners. Sharing best practices across the network of companies within the Bidvest Group enables us to observe and learn from great practice, not only from companies operating in the cleaning industry.

About BIC Consolidated:

What we do:

we are a leading provider of integrated cleaning services in Australia.

Revenue:

+\$400m

Client sites:

+3,200

Employees:

6,120



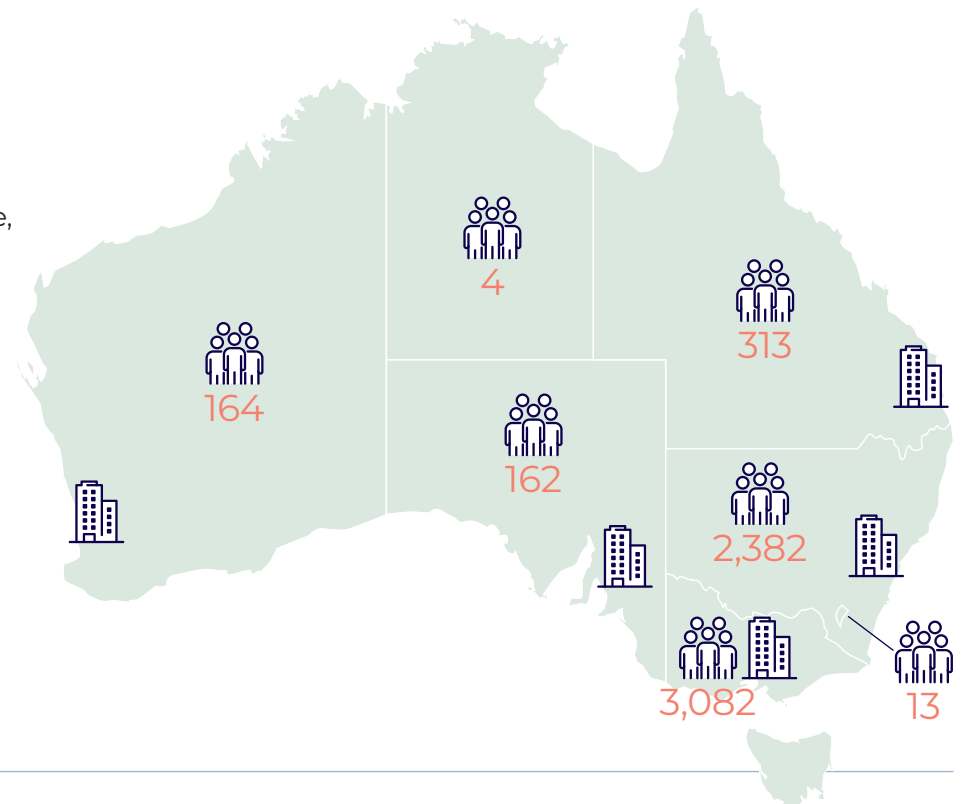
State Offices:

5



(Sydney, Melbourne, Brisbane, Perth, Adelaide)

Our people come from culturally diverse backgrounds, with more than 81 nationalities making up more than 92% of our staff. We could not do what we do, every day, without the incredible people that work for us. As such, their health, safety and wellbeing is of paramount concern for us.



About our Supply Chain

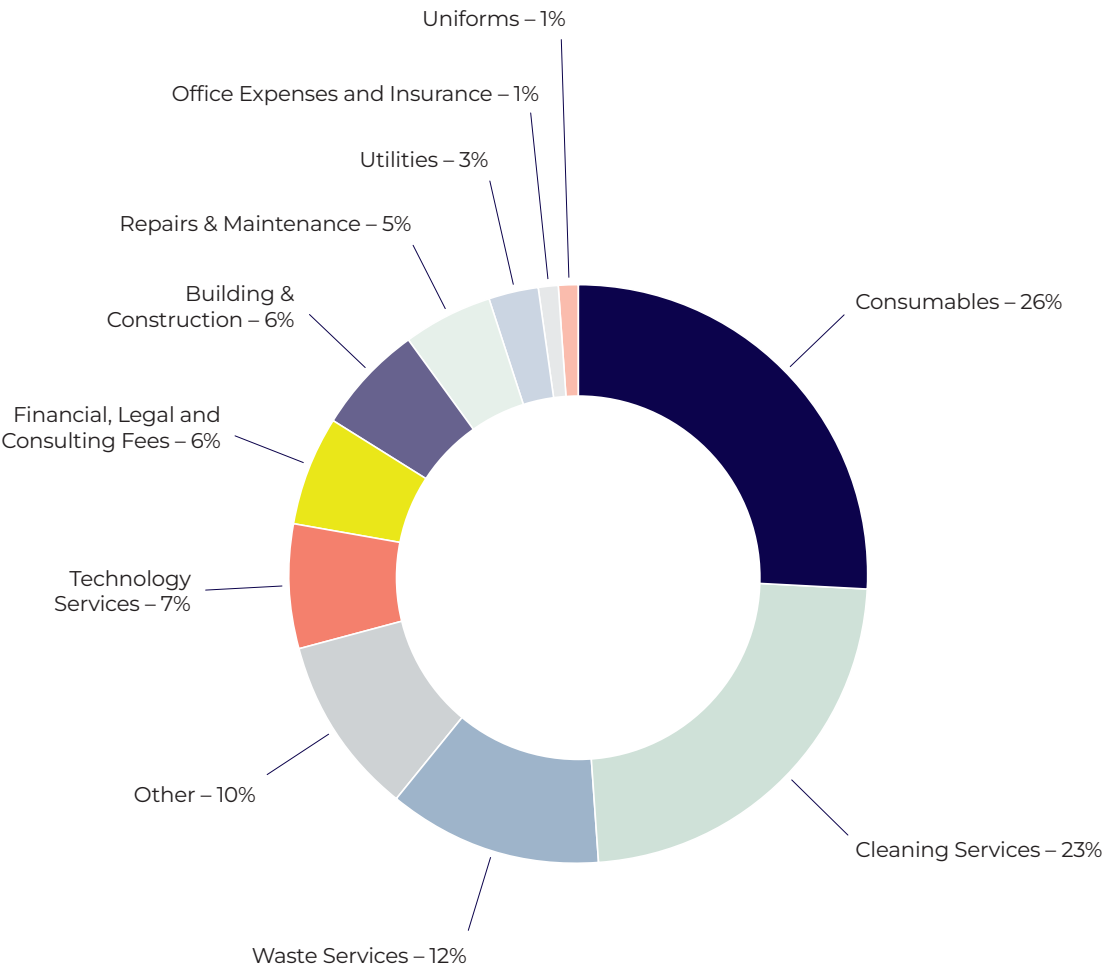
BIC Consolidated uses a wide range of suppliers to provide cleaning materials and solutions, equipment, and uniforms and engages specialists to provide high-rise window cleaning, hygiene, and waste removal. We also procure corporate products and services including office supplies, professional services and IT equipment.

Most of our Tier 1 suppliers are based in Australia, with a multi-layered supply chain extending across multiple countries. This global network complicates the process of gaining transparency, making it difficult to maintain clear oversight of working conditions. We acknowledge the potential risks related to labour rights violations, particularly in certain geographies and local contexts, where many thousands of workers may be involved.

In FY24 our supplier spend was more than \$30m (excluding statutory spend) and we engaged with 559 suppliers.

12 key suppliers account for nearly 50% of our spend.

Procurement Categories



Our Commitment to Human Rights

At BIC Consolidated, we are committed to upholding high ethical standards in our business practices and decision-making, recognising our responsibility to all stakeholders. Central to this commitment is respecting the human rights of all individuals we engage with, both directly and indirectly. We actively participate in global initiatives, such as the UNGC, to advance human rights and promote transparency. Since 2020, we have been a proud and active participant in the UNGC, publishing an annual Communication on Progress to report our actions to support its ten principles on labour, environment, human rights, and anti-corruption. You can visit the BIC Consolidated company page on the UNGC website for more details.

Our governance framework integrates ESG objectives and commitments into decision-making across our supply chains. In FY24, we updated our Human Rights Commitment and adopted the Bidvest Code of Ethical Purchasing, which have a strong focus on preventing child labour and other human rights abuses. Additionally, we participated in the UNGC Human Rights Due Diligence Working Group to build our knowledge and challenge our thinking and approach. Through our Risk Management Framework, we consistently assess and act on human rights due diligence, ensuring alignment with international standards.



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

- Forced to work
- Excessively long shifts
- No payslip



MONEY

- Little or no pay for work
- Money controlled by someone
- Money owed to someone else



TRAVEL

- Transported to and from work
- Travel to Australia paid and organised by someone else



WELLBEING

- Threats to the person or their family
- In fear of someone
- Isolated from others
- Signs of abuse/mistreatment



ID AND DOCUMENTS

- No Passport or visa
- ID taken by someone else
- Fake ID givent

Understanding the Risks of Modern Slavery Practices in our Operations and Supply Chain

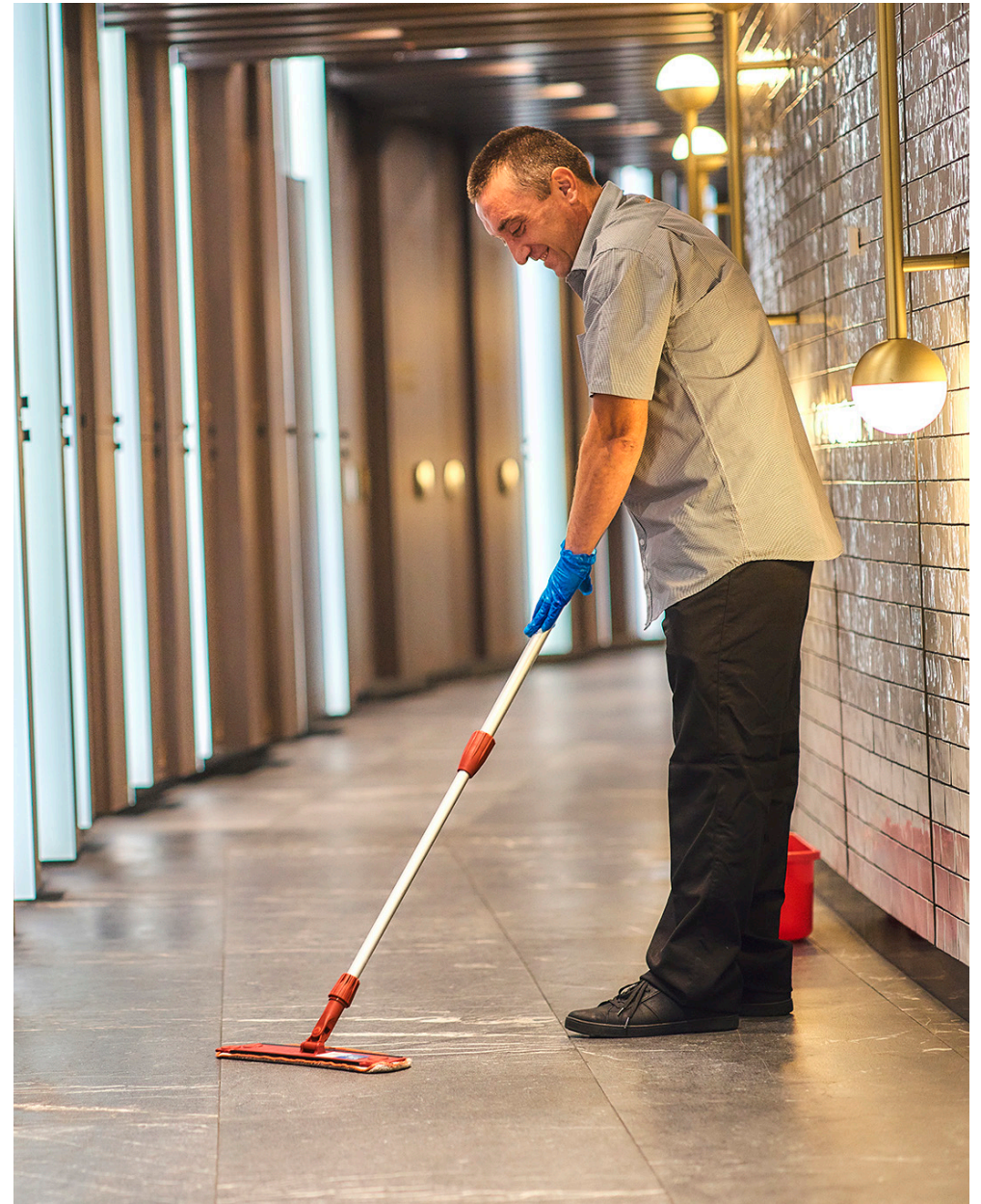
At BIC Consolidated, we consider modern slavery within the broader framework of human and labour rights, ensuring a comprehensive approach to ethical practices. This approach aligns with the globally recognised UN Guiding Principles, which outline the various ways businesses can impact human rights. We recognise that our business activities may:

- Directly cause
- Contribute to, or
- Be linked to modern slavery.

Understanding and mitigating these risks is an ongoing process, supported by our Risk Management Framework and strong corporate governance which guides ongoing human rights due diligence across our business. Our experienced Risk and Compliance, Procurement, ESG, and People and Culture teams bring this commitment to life daily.

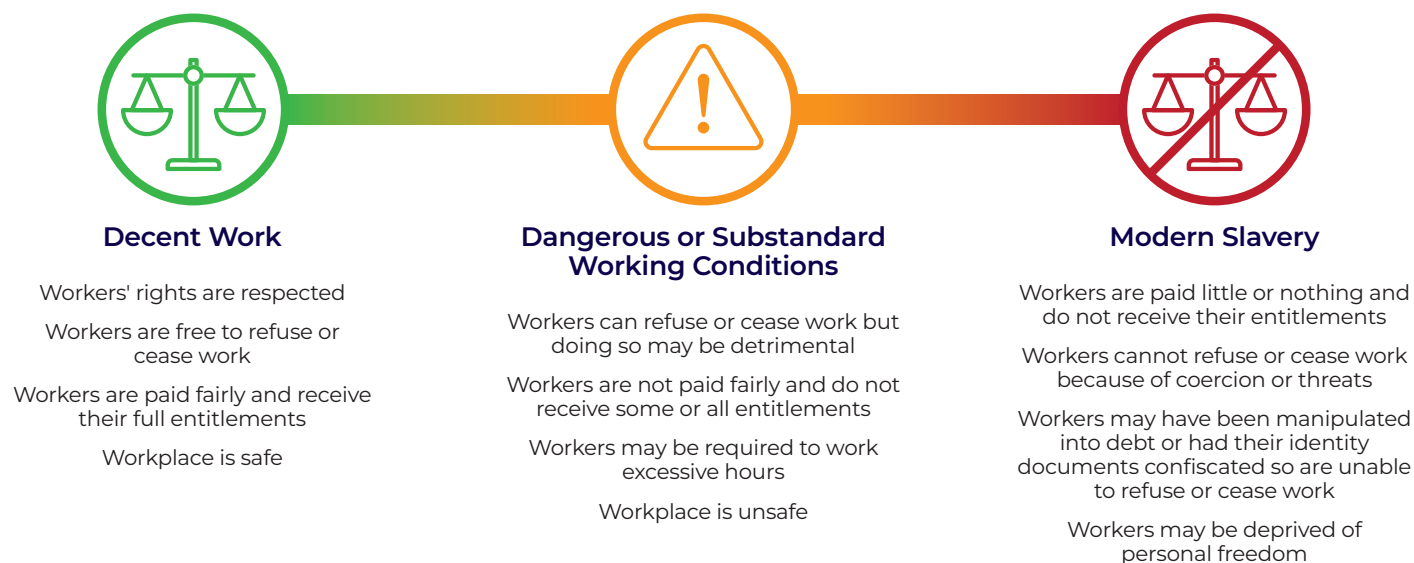
In line with the Australian government's 'Commonwealth Modern Slavery Act – Guidance for Reporting Entities,' we have

evaluated modern slavery risks across our supply chains and operations, identifying areas where workers are most vulnerable. To assess these risks, we considered four key categories being sector and industry risk (risks associated with specific sectors prone to exploitation), geographic risk (regions with higher instances of modern slavery), product and service risk (products or services linked to forced labour), and entity-specific risk (specific operations susceptible to modern slavery). This evaluation informs our targeted actions to mitigate risks and protect vulnerable workers and ensures that we focus our resources and actions where we have identified the greatest potential for modern slavery risk.



Our Operations:

Modern slavery is a grave violation of human rights, encompassing a range of abusive practices such as trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment, and the worst forms of child labour. These practices inflict severe harm on victims, stripping them of their freedom and dignity. In industries such as cleaning, precursors to modern slavery risk include breaches of workplace laws, fraudulent subcontracting arrangements, below-minimum wage payments, and insecure job conditions. BIC Consolidated understands that there is a spectrum of harmful behaviour, articulated by the Cleaning Accountability Framework Modern Slavery Spectrum in cleaning:



BIC Consolidated operates in a sector that has historically been known for having higher risks of labour rights violations. The cleaning industry attracts vulnerable workers, such as migrants and individuals for whom English is not their first language. The risk of exploitation is heightened and compounded by high customer expectations of service quality and growing compliance requirements. At BIC Consolidated, we are committed to addressing these risks within our operations and taking proactive steps to protect vulnerable workers.

Addressing these potential risks and substandard working conditions requires action to ensure compliance with labour standards, improve working conditions, and promote transparency within the industry.

Supply Chain

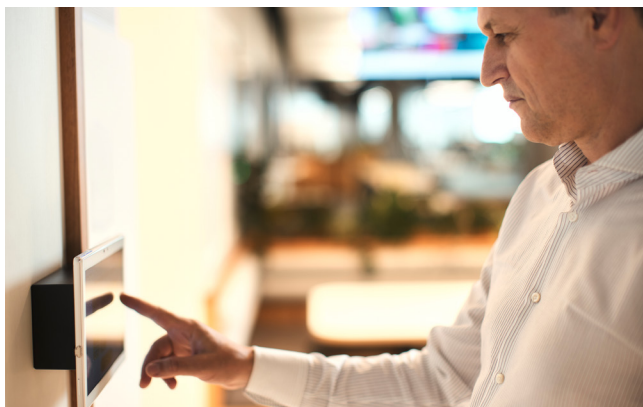
We must deepen our understanding of our supply chain to better assess supplier risks and drive improvements and so our focus is on engaging suppliers to ensure they hold their own suppliers accountable. This helps raise performance standards and enhances risk identification and mitigation across the entire supply chain. As a significant purchaser of goods and services, we have a crucial role in influencing and holding our suppliers accountable. At the same time, we must act with integrity and consistency. By acting responsibly, we can help prevent negative human rights impacts and ensure a more ethical supply chain.

With more than 550 suppliers in our supply chain, we adopt a risk-based approach to ensure that we prioritise the implementation of our extended supplier due diligence processes on building more understanding and transparency on those suppliers assessed at a higher priority of the potential risk of modern slavery (as well as other ESG risks). We commenced this approach in FY22, and have completed this assessment again for FY24, analysing our suppliers against the following criteria to identify those at a higher risk of modern slavery:

Sector, Industry and Specific Product Risk

There are several industries across the globe that are considered more susceptible to modern slavery risks due to factors such as low wages, migrant labour, high demand for low-skilled labour, complex supply chains and weaker labour protections. This includes industries such as agriculture and farming, construction, and mining and extractive industries and the production of products such as palm oil and seafood and fish products.

For BIC Consolidated, it is industries including manufacturing and textiles (and the production of garments and apparel in factories) and technology and electronics (and the production of electronics and electrical products) that present the highest potential risk of modern slavery in our supply chain, as identified in the Walk Free Global Slavery Index.



Understanding Geographic Risk

Most of our direct suppliers are based in Australia. However, we recognise that many of our indirectly supplied goods and services come from other parts of the world that are more exposed and vulnerable to the risks of modern slavery than those from which we directly contract. Our work is ongoing to better understand this indirect risk, leveraging the resources of the Walk Free Global Slavery Index to support this.



Understanding Entity Risk

Certain entities may pose a higher risk of modern slavery due to factors such as weak governance structures, high-risk business models, and inadequate ethical practices. We maintain strong visibility over many of our direct contractors through regular monitoring and compliance checks. These contractors are required to meet rigorous onboarding standards, including adherence to our ethical sourcing policy. We recognise though that the risk of modern slavery can be higher with smaller, one-off suppliers, who may not have the same level of resources, expertise, or structured compliance processes as larger suppliers.

Using this framework, we have assessed our supply chain against the following criteria to identify those suppliers at higher potential risk of modern slavery:

- Large Value Procurement – \$100,000 and above.
- The Global Slavery Index Hot Spot Industries (for BIC Consolidated, garments and electronics).
- Any International Suppliers.
- Labour Hire Partners.
- Our interactions and experiences with our specific suppliers.

Any suppliers that meet any one of these criteria are included in the priority category A or B level of our supplier assessment and are subject to our extended due diligence procedures (see page 15). Just under 80% of our spend is accounted for by the 64 suppliers in these categories.

Note: For some of our larger suppliers, such as those in telecommunications and computer equipment, we have limited ability to influence their business practices. For these suppliers, we monitor publicly available information on their human rights and modern slavery practices, using this to guide our purchasing decisions.

Suppliers		No. of Suppliers	% of Spend
Total Suppliers		559	100
Category A	Large Value Procurement – \$500,001 & above, the Global Slavery Index Hot Spot Industries, all International Suppliers & Labour Hire Partners	12	48.5
Category B	Large Value Procurement – \$100,001 to \$500,000	52	31.1
Category C	Medium Value Procurement – \$20,001 to \$100,000	118	15.3
Category D	Small Value Procurement – \$5,001 to \$20,000	122	4
Category E	Low Value Procurement – \$0 to \$5,000	255	1.1

Summary

We have identified key risks in both our operations and supply chain that must be addressed to protect workers' rights:

- Upholding all labour rights
- Ensuring safe working conditions for workers in both our operations and supply chain.

Breaches in these areas are early indicators of worsening conditions and could lead to incidents of modern slavery. Examples of these harmful practices include deceptive recruitment, coercion through immigration threats, debt bondage, and the confiscation of personal and travel documents.

Other concerns include withholding wages, forcing excessive overtime, and subjecting workers to dangerous or substandard working conditions and we acknowledge that these practices have been found in the cleaning industry in Australia.

Additionally, we face the potential risks of child labour, forced labour, and lack of freedom of association in our supply chain. We are committed to addressing these risks by strengthening our policies, engaging with suppliers, and conducting regular audits to ensure compliance with labour rights standards.

Despite the higher risks associated with the industry in which we operate, BIC Consolidated confidently assesses the risk of modern slavery in our operations as low. This outcome is a result of our proactive efforts, including the comprehensive safeguards we have put in place and the strategic decisions made regarding our business structure, which prioritise ethical operations and sustainability.

Our ongoing commitment to these safeguards ensures that modern slavery risks remain low, in alignment with our core values of integrity and responsible business practices. See page 15 below for more details on the actions we have in place.

We have assessed the risk of exposure to modern slavery practices in our supply chain as greater than that of our own operations due to the complex and multi-layered global nature of our supply chain which means that our visibility and control of it is limited.



Actions Taken to Assess and Address our Modern Slavery Risks

BIC Consolidated continues to assess and take action to address risks of harm to people in our operations and supply chain, through the application of our human rights commitments and modern slavery risk management practices.

Our response is led by our Board and Executive Team and executed on a daily basis by a collaborative team approach which includes our GM – ESG, GM – P&C, Head of Risk Management and Procurement and Inventory Manager. To ensure that our approach is embedded in our business-as-usual operations, we leverage our existing corporate governance structures to oversee our approach and deliverables.

Our Modern Slavery Framework (MSF) outlines our actions and ensures a comprehensive all-of-business response to the issue of modern slavery.

Policies, Procedures and Frameworks

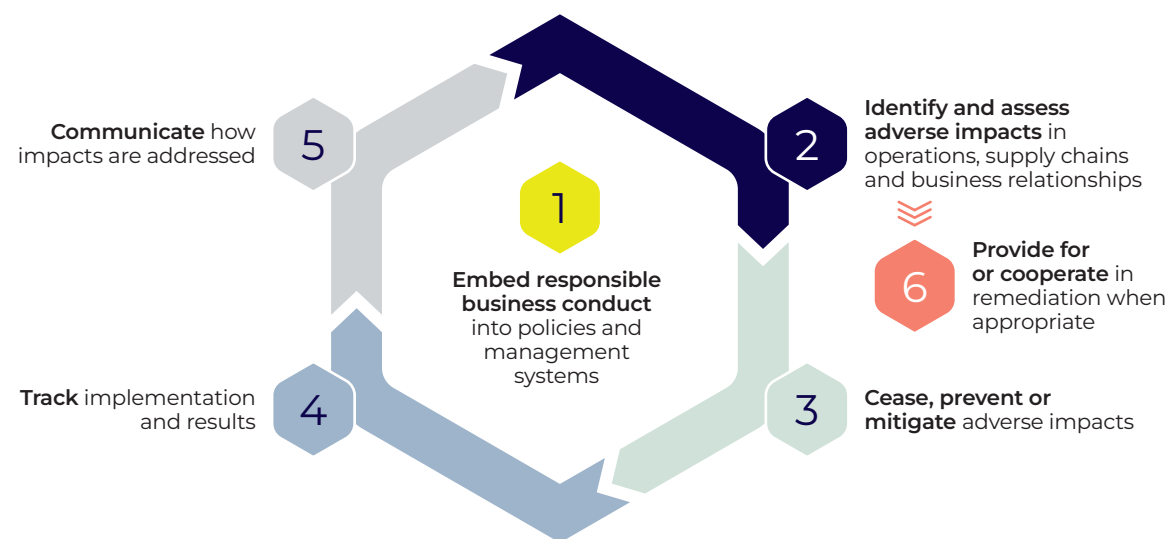
We have various mechanisms in place, including policies, procedures and frameworks that underpin our approach to address modern slavery, including how we work and how we engage with our stakeholders. As our operations are Australian based, these mechanisms reflect

Australian legislation regarding human rights. During the reporting period, we updated our Human Rights Policy and adopted the Bidvest Code of Ethical Purchasing. These updates saw us include learnings and insights from external organisations such as the UN Global Compact regarding human rights due diligence, and feedback from our customers as well as other stakeholders including suppliers. Keeping these policies up to date ensures that our stakeholders are clear about our expectation that they take action to address the risk of modern slavery and broader human rights issues both within their own businesses and supply chains. A detailed list of our policies can be found in ‘other relevant information’ on page 20 of this report.

BIC Consolidated also leverages its risk management framework to address key risks, including modern slavery, in line with broader business risks. Once we identify a risk, we define responsibilities, and outline actions to mitigate the risk with risks overseen by our Risk Working Group and ESG Committee. We also review the effectiveness of these actions to ensure they align with our framework’s standards. By following this approach, we ensure that modern slavery risks are effectively managed across our operations.

During the reporting period BIC Consolidated was not aware of any breaches of policies relating to modern slavery.

Due Diligence Process and Supporting Measures



BIC Consolidated's Workforce

BIC Consolidated assesses the risk of exploitative labour practices among its direct employees as low. Most of our workforce is directly employed across Australia, including in New South Wales, Queensland, South Australia, Victoria, and Western Australia. These jurisdictions have strong employment, workplace health and safety, and anti-discrimination laws that we must comply with. All employees have a formal employment contract, with more than 90% of employees covered by a Modern Award. We prioritise the safety and well-being of our employees, in line with our ISO 45001-certified Workplace Health and Safety Management System.

We regularly monitor potential risk areas and review our employment policies, processes, and procedures to ensure they reflect current legislation and best practices. Our recruitment processes clearly outline the documents and information candidates must provide, such as proof of age and work authorisation documentation. Our onboarding process ensures that new employees are registered in our time and attendance system for accurate payroll management.

When tendering for new business, we ensure that contracts are accurately costed to cover the full and true cost of service provision, ensuring fair compensation for our employees. We are committed to maintaining high labour standards and continuously improving our practices to safeguard the welfare of our employees.

We also undertake auditing of our own systems and participate in customer-led independent auditing. Aspects covered in the audits include governance, policies and practices, training,

communications and industrial relations, among other topics. We remain committed to participating in such audits and welcome insights and learnings from the process.

Importantly, BIC Consolidated is committed to the principles of the CAF. CAF is a multi-stakeholder organisation that exists to end exploitation in the cleaning industry and improve labour standards through education and advocacy. The certification focuses on ensuring that cleaning staff are treated fairly, with attention to labour rights, pay, working conditions, and safety. CAF also emphasises transparency in cleaning contracts, requiring cleaning companies to demonstrate accountability through clear policies, monitoring, and regular audits. Owners and property managers of commercial and residential buildings are typically the primary stakeholders in this process and are responsible for ensuring that the cleaning services they contract are compliant with CAF standards, while cleaning service providers like BIC Consolidated are directly responsible for meeting the certification requirements and adhering to standards of quality, sustainability, and ethical labour practices.

During FY24 BIC Consolidated:

- Completed 14 CAF building certifications. This is the highest number of CAF certified buildings of any other commercial cleaning company in Australia, with approximately 40% of all CAF building certifications held by BIC Consolidated.
- CPS were CAF Contractor Pre-qualified in FY24. Since year end, we have commenced Pre-qualification for the whole BIC Consolidated

business. CAF Contractor Prequalification is a high-level systems, policies and processes assessment of a cleaning contractor against the CAF 3 Star Standard. The overall objective of the Contractor Prequalification scheme is to facilitate CAF Building Certification at a portfolio level leading to a more rigorous and efficient certification process. To achieve Prequalification, the Cleaning Contractor needs to demonstrate compliance against the following criteria:

- Fair Labour Practices
- Responsible Contracting and Transparency
- Safe working conditions
- Financial viability
- Worker engagement
- Issue identification and remediation

Contractor Prequalification is designed to create efficiencies in the CAF Building Certification process by providing documents that apply across the organisation just once as part of the Prequalification assessment, reducing the number of documents requested as part of a specific Building Certification assessment.

Our focus remains on raising awareness about modern slavery and the actions to take if it is suspected. We actively encourage our people to speak up on potential human rights issues and are clear that we will not tolerate any form of exploitation. In FY24, we delivered mandatory training modules to employees on identifying modern slavery and reporting suspected. We delivered this training through all available channels including newsletters

and toolbox talks as well as CEO updates and presentations. In addition, all people managers completed the comprehensive UTS Modern Slavery training module, which covers types of modern slavery—such as human trafficking, servitude, forced labour, debt bondage, and forced marriage—through real-life stories and practical examples. The training also helps employees understand how modern slavery intersects with their daily lives and empowers them to take action. 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.

These efforts contribute to fostering a culture of accountability and vigilance across our organisation. We are committed to ensuring that modern slavery is recognised and addressed proactively, with every employee empowered to contribute to the solution.

Our Supply Chain

Whilst we aim to minimise the number of suppliers we engage, the coming together of the BIC and CPS businesses has seen a temporary increase. Over the coming months, we will be rationalising our suppliers.

A cross-functional program of work is ongoing to improve processes to assess and address the risk of modern slavery across our supply chain. The focus has been to identify our highest potential exposure to modern slavery practices and map existing controls and consider how these can be improved, as well as build greater transparency

of our supply chain beyond tier 1. We have leveraged the knowledge and insights gained from collaborations with organisations such as the UN Global Company Network Australia Modern Slavery Community of Practice in undertaking this work.

As a significant purchaser of goods and services we know that our activities could directly or indirectly drive an adverse human rights impact in our supply chain through us placing unreasonable demands on our suppliers which could result in unacceptable labour practices down the supply chain. As such, BIC Consolidated develops long term partnerships with suppliers whose policies, values and cultures complement our own, prioritising honest, transparent and regular communication. We set and expect high standards and work with our suppliers to ensure they understand our requirements and can meet them on an ongoing basis.

In FY24, BIC Consolidated rebranded and reviewed functionality of our CM3 Contractor Management Platform. Part of the review included auditing priority suppliers (category A & B) status and compliance in the CM3 system. Our CM3 Contractor Management Platform supports the management of supplier relationships and processes, including onboarding, performance management, risk management and compliance. Each of the category A & B suppliers has been required to explicitly acknowledge the Bidvest Code of Ethical Purchasing (which will be required annually) and has been required to complete a modern slavery risk questionnaire.

A key part to component to assessing modern slavery risk includes how we actively manage our suppliers. We are committed to building, maintaining and improving relationships with

our suppliers to ensure that they meet or exceed agreed-upon standards in terms of quality, cost, delivery, and compliance requirements. It's a proactive approach that goes beyond merely placing orders and receiving goods and includes:

- Carefully selecting suppliers based on criteria such as quality, reliability, financial stability, and ethical practices.
- Onboarding new suppliers with clear communication of expectations, standards, and establishing clear contractual agreements that specify the terms and conditions, and responsibilities.
- Continuously assessing supplier performance through performance indicators like delivery time, product quality, cost competitiveness, and service levels.
- Establishing open, ongoing communication channels with suppliers to build a strong, collaborative partnership, conducting regular meetings to discuss performance, concerns, opportunities for improvement and communicating transparently on a wide range of topics include broader ESG focus and performance.
- Proactively identifying risks in the supply chain and collaborating with suppliers on mitigation strategies.
- Ensuring that suppliers adhere to legal, regulatory, and ethical standards, including environmental practices, health and safety, labour laws, and sustainability.
- Monitoring compliance with agreed-upon contract terms, renegotiating when necessary, and ensuring payments are timely and accurate.

During the year we continued the auditing of a number of our Tier 1 suppliers. In addition, we commissioned special external audits of two of our most significant suppliers. The intention was to ensure that these companies adhered to high standards of social responsibility, including labour rights, workplace conditions, and ethical business practices. Conducted by Workplace Wizards, the audits focused on our suppliers' compliance with their obligations under various employment-related legislation and obtained Corporate Social Responsibility (CSR) documentation for review of approaches and performance. The results of the audits were shared with both suppliers and where suggestions for improvement or corrective actions were suggested. It is our intention to expand this program of external auditing of key suppliers in the FY25 financial year.

We understand the value of building strong, trusted partnerships with our suppliers to foster collaboration, reduce risks, and ensure long-term success. Having sometimes uncomfortable conversations with our suppliers is necessary to support them in mitigating risks like modern slavery and driving improvements across their businesses and supply chains. We often find that suppliers are hesitant to share supply chain information, viewing it as commercially sensitive. This is not about gaining a competitive advantage or catching suppliers out, but about fostering continuous improvement in their operations. We are fully committed to driving this message of improvement with our suppliers as we move forward. If a supplier is unwilling or unable to address risks and make necessary improvements, we will consider termination of the agreement only as a last resort. We recognise that progress takes time, and we are committed

to staying the course to ensure meaningful improvements. We are dedicated to building strong, ethical relationships with our suppliers and ensuring their long-term success through collaboration and continuous improvement.

Whistleblowing Protection, Remediation and Victim Support

We encourage an open and transparent workplace and a culture of reporting any suspected wrongdoing. BIC Consolidated's Modern Slavery Response Approach leverages existing processes and procedures and outlines the mechanisms for receiving and addressing modern slavery concerns and complaints. It also details how we may provide remedies for impacted stakeholders. The Approach includes:

- The BIC Consolidated Whistleblower Policy, allowing complaints to be made directly to our Whistleblower Protection Officer (WPO) or an independent service provider.
- The BIC Consolidated Grievance Policy, enabling employees to raise issues through formal channels.
- Direct communication with any member of the Executive or broader Management team.

The Approach aligns with the UN Guiding Principles on Business and Human Rights (the UNGPs) and the Ten Principles of the UN Global Compact, ensuring our grievance mechanisms are clear, fair, accessible, and based on open dialogue. Our practices reflect the UNGP requirement that grievance mechanisms be legitimate, predictable, transparent and rights compatible.

While the Approach outlines a general process, it is adaptable. Each potential instance of modern slavery is managed on a case-by-case basis, with facts and risks assessed to determine the appropriate course of action. The needs of impacted stakeholders are assessed individually to ensure appropriate support and remedy and alignment to their preferred action.

Assessing the Effectiveness of our Actions

Assessing the effectiveness of our actions to address modern slavery is an ongoing process that ensures our efforts are achieving meaningful outcomes. Our key governance bodies, including the Risk Working Group, ESG Committee, and ultimately the BIC Consolidated Board, are responsible for assessing the overall effectiveness of our actions. These bodies oversee several key areas, including:

- Clearly defined roles and responsibilities regarding modern slavery actions.
- Up-to-date and relevant policy commitments.
- A comprehensive training program that builds genuine understanding and capability to identify and act on suspected modern slavery incidents.
- Regular review of our risk assessment processes to ensure effectiveness.
- Collection of feedback from various areas within the business, as well as externally.
- Oversight of outcomes from relevant audits (both internal and supply chain) and actions taken on findings or recommendations.
- Monitoring the number and themes of internal grievances and whistleblower complaints.
- Tracking supplier acknowledgment of the Bidvest Code of Ethical Purchasing and completion of required supplier questionnaires.

Ultimately, the effectiveness of our actions is measured by our ability to identify modern slavery risks within both our business and supply chain. To date, we have not identified any instances of modern slavery within our business or supply chain. This underscores the need for continued efforts to improve the effectiveness of our actions and to further strengthen our ability to identify potential risks.



Next Steps and Other Relevant Information

Related BIC Consolidated policies

BIC Consolidated has established policies and procedures that govern how we operate. These policies are regularly reviewed through internal and external consultation with relevant stakeholders to confirm their relevance and approach. The policies that are relevant to how we manage potential human rights and modern slavery issues include:

- Code of Conduct
- Human Rights policy
- Supplier Policy
- Bidvest Code of Ethical Purchasing
- Privacy policy
- Procurement & Expense Management Policy
- Grievance Policy
- Whistleblower Policy
- ESG Committee Charter

Next steps

- Enhance employee and supplier awareness of modern slavery risk and grievance channels, through targeted learning and engagement activities with specific teams and business units.
- Expand our modern slavery risk assessment to include more indirect suppliers. This includes investigating the use of specialist technology platforms to enhance our understanding of tier 2+ modern slavery risks
- Expand our modern slavery partner network to enhance the impacted stakeholder voice in our approach and action.
- Stay committed to transparently reporting activities and progress.



Glossary

Australian Modern Slavery Act:

The Modern Slavery Act 2018 (Cth) is a significant piece of legislation aimed at addressing modern slavery in global supply chains and business operations. It came into effect on 1 January 2019 and is designed to enhance transparency, accountability, and action in identifying, addressing, and preventing modern slavery in Australia.

Cleaning Accountability

Framework (CAF): This is an approach designed to improve the sustainability, quality, and performance of cleaning services, particularly in settings like commercial buildings, public spaces, and healthcare facilities. It provides a set of guidelines and standards for cleaning services that focus on the social impacts of cleaning practices, promoting transparency, accountability, and continuous improvement in the cleaning industry.

Human rights: They are the fundamental rights and freedoms that every person is entitled to, regardless of their nationality, ethnicity, gender, religion, language, or any other status. These rights are inherent to all human beings and are based on the principles of dignity, equality, and respect.

Human rights are universal, inalienable, and indivisible, meaning they apply to all people and cannot be taken away or denied.

Modern Award: This refers to a set of legally binding minimum employment standards that apply to workers in the cleaning industry. Modern Awards outline the minimum pay rates, conditions, and entitlements for employees in specific industries or occupations, including cleaning.

Modern slavery: This refers to situations where individuals are exploited, coerced, or controlled for labor or sexual exploitation through various forms of force, fraud, or coercion. Unlike historical slavery, where individuals were openly treated as property, modern slavery often occurs in hidden, illegal, or exploitative forms, taking place in supply chains, workplaces, and even in private homes.

Supply Chain Sustainability School:

This is a collaborative initiative designed to help businesses and organisations improve the sustainability of their supply chains. It provides free resources, training, and guidance to suppliers and businesses in various industries, helping them adopt sustainable practices and meet growing

expectations for ethical and responsible sourcing.

Tier 1 and beyond suppliers: Tier 1 suppliers are typically the first level in the supply chain and have a direct relationship with the company. Beyond tier 1 suppliers can also be called indirect suppliers.

United Nations Global Compact

(UNGC): This is a voluntary initiative for businesses and organisations committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment, and anti-corruption. Launched in 2000 by then-UN Secretary-General Kofi Annan, the Global Compact encourages companies worldwide to act as responsible corporate citizens and take actions that support the UN's broader goals, including sustainable development.

United Nations Guiding Principles on Business & Human Rights

(UNGPs): These principles were adopted by the United Nations in 2011 as a global framework to help businesses respect human rights in their operations and supply chains. They were developed by Professor John Ruggie, who was the UN Secretary-General's Special Representative

for Business and Human Rights and are designed to provide clarity on the responsibilities of businesses, governments, and other stakeholders in addressing human rights issues related to business activities.

Walk Free's Global Slavery Index:

This is a research report focused on addressing modern slavery. The index provides a comprehensive and data-driven overview of the state of modern slavery around the world, offering insights into the scale, scope, and characteristics of slavery, as well as the effectiveness of government responses to combat it.



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