



# MODERN SLAVERY STATEMENT AND POLICY



## Modern Slavery - Statement of Intent

The purpose of this policy is to set out how Associated Cleaning Services will deal with Modern Slavery within its supply chain, provide awareness of what is Modern Slavery and encourage individuals to be on the lookout for and report suspected acts of Modern Slavery. This policy will set out the guidelines LWB is to follow, the protection that is afforded to those that report acts of Modern Slavery and training on what is Modern Slavery.

Associated Cleaning Services (ACS) is dedicated to evaluating commercial cleaning standards and improving individual wellbeing, and will no way condone, support or contribute, either directly or indirectly to Modern Slavery.

With the introduction of the Modern Slavery Act 2018 (Cth), ACS is committed to assist with the eradication of Modern Slavery by implementing this policy and managing the risk with contractors and suppliers so as not engage in Modern Slavery.

## Audit / Evaluation

Document review and audits are to be carried out annually to comply with legislative requirements.

## Breach of policy

Breaches of this policy may result in the immediate cessation, dismissal and termination of any activities causing or potentially causing violations of social and legislative requirements. Additionally, any relevant information collected by ACS may be provided to law enforcement for possible criminal investigation

## Roles and Responsibilities

The Managing Director of ACS has overall responsibility for ensuring this policy complies with ACS's legal and ethical obligations, and that all those under our control comply with it. The General Manager(s) will have primary and day-to-day responsibility for implementing this policy at the organisation, monitoring its use and effectiveness, dealing with any queries about it, and take the leading role in auditing internal control systems and procedures to ensure they are effective in identifying instances of potential slavery.

## Application

While ACS recognise that modern slavery and human trafficking risk may occur in an organisation's extended supply chain, we know that the level of risk is influenced by complex factors. Accordingly, we have tailored our risk system to focus our efforts on those areas that present an elevated risk of exposure; through Lines of Action covering internal processes and procedures, and external programs and initiatives. Accordingly, the applicability of this Policy is not confined solely to our employees or contractors. Therefore, we are committed to ensuring that we make a difference beyond our business operations as global and community citizens.

## Scope

In its broadest, 'modern slavery' refers to any situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power or deception. The Australian regime defines modern slavery to incorporate conduct that would constitute an offence under existing human trafficking, slavery and slavery-like offence provisions set out in Divisions 270 and 271 of the Commonwealth Criminal Code. Modern slavery, therefore, encompasses slavery, servitude, the worst forms of child labour, forced labour, human trafficking, debt bondage, slavery-like practices, forced marriage and deceptive recruiting for work or services.

## Lines of Action

ACS will assess and mitigate Modern Slavery risk by;

### 1. Policy Implementation and Communication:

- ACS has established a clear and robust Anti-Slavery and Human Trafficking Policy that outlines our commitment to preventing modern slavery in our business and supply chains.
- This policy is communicated to all employees, subcontractors, and suppliers to ensure awareness and adherence.

### 2. Supplier Due Diligence:

- ACS conducts thorough due diligence on all new and existing suppliers to assess their compliance with modern slavery laws and ethical standards.
- This includes reviewing their policies, procedures, and practices related to labour rights and human trafficking.

### 3. Risk Assessment and Management:

- ACS regularly assesses and monitor potential risks of modern slavery within our operations and supply chains.
- High-risk areas are identified, and appropriate mitigation strategies are developed and implemented.

### 4. Training and Awareness:

- Comprehensive training programs are provided to employees and key stakeholders to raise awareness about modern slavery, its indicators, and our reporting mechanisms.
- Regular updates and refresher training sessions are conducted to keep everyone informed and vigilant.

### 5. Reporting and Whistleblowing:

- ACS has established secure and confidential channels for reporting any concerns or suspicions related to modern slavery.
- All reports are thoroughly investigated, and appropriate actions are taken to address any issues identified.

### 6. Continuous Improvement:

- ACS is committed to continuously improving our practices and procedures to combat modern slavery.
- Regular reviews of our policies, risk assessments, and due diligence processes are conducted to ensure their effectiveness and alignment with best practices.

By implementing these actions, ACS ensures strict compliance with modern slavery policies and statements, reinforcing our commitment to ethical business practices and the protection of human rights. We remain dedicated to creating a transparent and responsible supply chain, free from any form of exploitation.

## Compliance

All ACS staff and contractors must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of the business or supply chain is the collective responsibility of all those working for or under ACS managerial control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. Staff must notify their manager as soon as possible if it is suspected that a breach or potential breach of this policy has occurred or may occur in the future. All parties are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If a suspected breach of this policy has occurred or a potential breach may occur, ACS management must be notified as soon as possible. The welfare and safety of local workers are a priority and consistent with our obligations under the Modern Slavery Act, ACS has zero tolerance on coercive, abusive and exploitative work practices within our supply chains or workforce.



Troy Cotterrell

Director

Associated Cleaning Services Pty Ltd

Date: June 2024

Review Date: June 2025

Exceptional Support, Exceptional Service



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