

MODERN SLAVERY STATEMENT AND FRAMEWORK

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“As a large Australian-owned and operated company in a high risk industry, and as a signatory to the United Nations Global Compact, we believe we have a significant opportunity to demonstrate and exemplify an ethical approach to cleaning”

CEO'S OPENING STATEMENT

The property cleaning industry has historically been classified as 'high risk'. As one of the largest truly national service providers, BIC Services is committed to leading the drive to eliminate modern slavery in all areas of our business. The Board of BIC Services consider the measures highlighted in this document, combined with BIC's strong values, ethics and proactive engagement with our business partners, are helping reduce the risks of modern slavery throughout our supply chain and operations.

BIC Services strongly opposes any human rights violations, including slavery and human trafficking. As a large Australian-owned and operated company in a high risk industry, and as a signatory to the United Nations Global Compact, we believe we have a significant opportunity to demonstrate and exemplify an ethical approach to cleaning. This doesn't just benefit our workers, but supports the success of our clients, their tenants, and the health of our business.

BIC has established a Modern Slavery Framework (MSF) to guide our actions against modern slavery and ensure a comprehensive approach across the business. We understand that a true commitment to tackle the issue can be demonstrated by achieving the targets we set in the framework and through transparent reporting. By monitoring our performance on an ongoing basis, we will maintain our focus on, and ensure our genuine commitment to, our goals. This in turn will allow us to identify areas in which we may need to focus more effort, as well as highlight our achievements.

BIC is committed to improving not just our business and that of our clients, but our industry. That is why we have proactively engaged with the Cleaning Accountability Framework (CAF), an industry-wide attempt to improve safeguards, practices and performance on human rights within the cleaning industry. BIC was one of the first cleaning contractors to achieve pre-qualification status after being audited against the CAF pre-qualification scheme, and one of the first to achieve multi-site CAF certification.

Our first Modern Slavery Statement, consistent with the Modern Slavery Act (2018), gives us an opportunity to detail our achievements so far and examine what we seek to achieve next. As CEO of an industry leading organisation, it's my personal responsibility to increase awareness of modern slavery risks across our industry and develop appropriate strategies and plans to combat it. We hope that our customers and sector peers will follow our lead.

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

Tony Gorgovski,
Chief Executive Officer

HOW WE CREATE VALUE

OUR PURPOSE

Smart cleaning for healthier communities

WHO WE ARE

We provide a full range of cleaning solutions including, maintenance, hygiene and waste management services for commercial, industrial, education, aged-care, health and public places across Australia.

VALUES



OUR MATERIAL ISSUES



OUR INPUTS



OUR STRATEGY

OUR PEOPLE

We look after our people and our people look after our clients



INNOVATION

We invest in innovation to continually improve our service delivery



SUSTAINABILITY

We partner with our clients to create sustainable ways of working



TRANSPARENCY

We carry out all business operations with complete transparency



STRATEGIC PILLARS

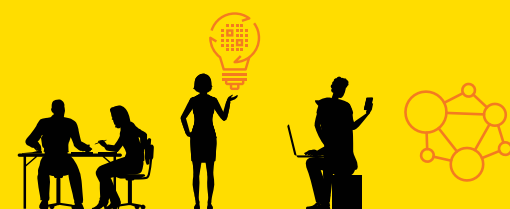
What this delivers

A safe, diverse and engaged workforce built on a direct employment model, fair payment and treatment, rigid health and safety standards, a standardised and consistent approach, the non-negotiable use of environmentally safe products and continuous education and training delivered through our Training Academy.



What this delivers

A data-rich solution that uses sensors, tracking beacons, tablets, smart devices and mobile apps to monitor and report -- in real time -- workforce movement, service delivery and tenant requests and feedback.



What this delivers

Mutually beneficial partnerships with our clients through customer-focused solutions for their cleaning requirements, investment in workforce training, positive relationships with tenants, and our data-driven technological innovations that improve efficiency, reduce environmental impacts and help them respond to sustainability disclosures.



What this delivers

A trusted and reputable national brand based on carefully considered policies and processes, a well-audited supply chain, expertise in environmental management and transparent disclosure and reporting.



OUTPUTS

Employ over
2,000
staff

Work over
50,000
shifts

Clean over
3,5 million
sqm of office
space

Clean over
3,250
client sites at
83 locations

OUR STAKEHOLDERS



Our people



Property owners, managers & tenants



Suppliers



Unions



Industry



Government



Research & Development



Suppliers



Products & Packaging



Marketing & Sales



Property owners, managers & tenants



Waste management

OUR VALUE CHAIN



1. MODERN SLAVERY HIGHLIGHTS



**ESTABLISHED OUR
MODERN SLAVERY
FRAMEWORK
AND STEERING
COMMITTEE**



**TRANSPARENCY IN OUR
SUPPLY CHAIN**



**CLEANING
ACCOUNTABILITY
FRAMEWORK**
1st contractor member



**REVIEW OF ALL
POLICIES AND
PROCEDURES TO
SUPPORT OUR
MODERN SLAVERY
FRAMEWORK**



**MODERN SLAVERY
TRAINING FOR
OUR LEADERSHIP
TEAM**



**PUSHING FOR
ABOVE-INDUSTRY
WAGES**
Through BIC Project Equity



**THE BIC TRAINING ACADEMY OF
EXCELLENCE**

Modern slavery awareness
for all our employees

* These highlights include achievements up to and including FY20, the reporting year for this statement

2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

ABOUT BIC SERVICES

BIC has been a leading provider of integrated cleaning services since 1989. We provide cleaning, hygiene and maintenance services, along with waste management and consumables across commercial, educational, industrial, aged-care and health spaces, as well as precinct and open spaces.

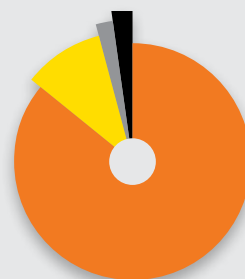
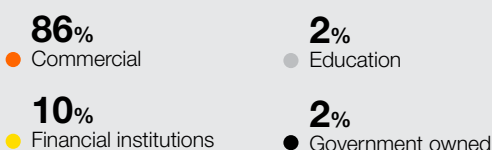
As an Australian-owned and operated business, and a signatory to the United Nations Global Compact, we are intent on demonstrating how an ethical cleaning company delivers better results for workers, clients and the industry. We are a large and diverse employer of choice across all states and territories in Australia. Many high-profile clients rely on our performance in relation to human rights to ensure their brand is protected. We therefore acknowledge that we can contribute significantly to the fight against modern slavery.

BIC Services is a privately owned company that does not own or control any other commercial entities.

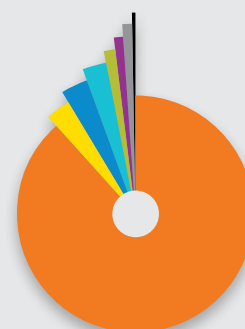
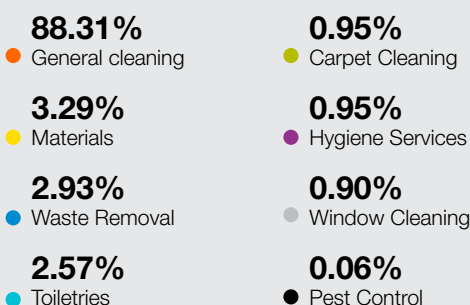


**OVER
\$130 MILLION**
ANNUAL REVENUE

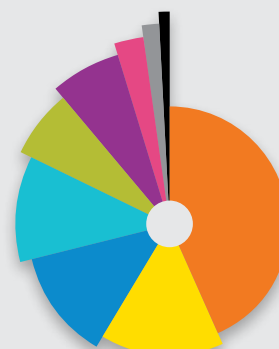
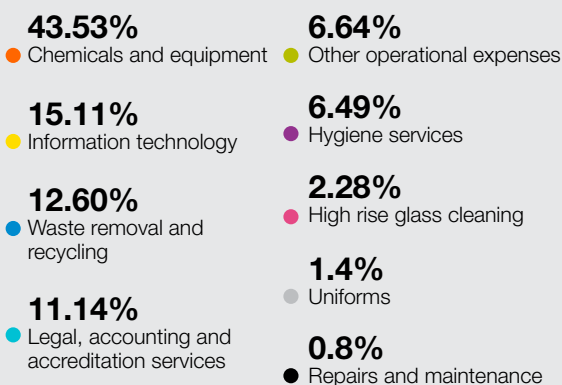
FY20 REVENUE BY CLIENT SECTOR



FY20 REVENUE STREAMS



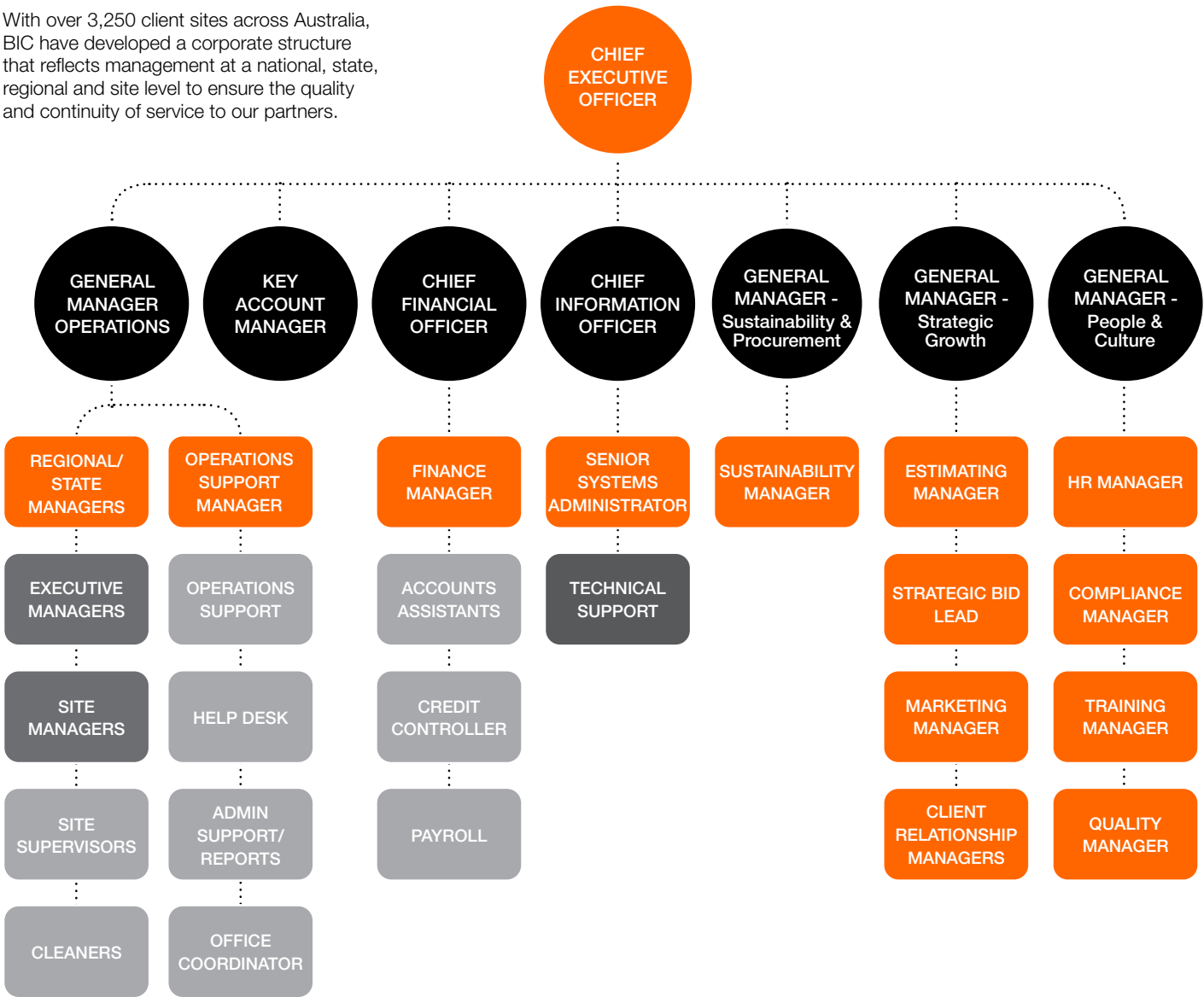
FY20 PROCUREMENT CATEGORIES BY SPEND



2. OUR STRUCTURE, OPERATIONS and SUPPLY CHAIN

ORGANISATIONAL STRUCTURE

With over 3,250 client sites across Australia, BIC have developed a corporate structure that reflects management at a national, state, regional and site level to ensure the quality and continuity of service to our partners.



2. OUR STRUCTURE, OPERATIONS and SUPPLY CHAIN

OUR SUPPLY CHAIN

In 2019, BIC completed an in-depth investigation into our supply chain and consequently introduced a supplier management portal with pre-qualifications, service agreements and corresponding KPIs to ensure complete transparency. We were then able to use this review to make the necessary adjustments to our procurement processes and spend, consolidating our supplier base and shifting spend away from high-risk countries to Australian and Indigenous suppliers.

BIC uses a range of suppliers for the provision of cleaning chemicals, equipment, uniforms, and specialists in the areas of high-rise window cleaning, hygiene and waste removal. Following the consolidation process described above, we spread our current spend of \$10.4 million a year across 37 suppliers. Our ten largest account for just under three quarters (73 percent) of this spend, giving us a small number of high-quality relationships within which we can ensure the strength of our human rights approach and ethical supply chain.

The five largest of our high risk suppliers (by spend) include Bunzl, which is headquartered in the UK and has produced [Statements on its anti-modern slavery and human trafficking](#) under the UK Modern Slavery Act. The remaining four are Australian-based companies, all operating primarily or exclusively within Australia.



“BIC completed an in-depth investigation into our supply chain and consequently introduced a supplier management portal.”

3.

THE IMPACT OF COVID-19

“COVID-19 meant that suddenly, cleaning was centre stage, and we were playing a crucial role in the national recovery. We were able to deepen our relationships with clients and win new business during this period, which is a testament to our ability to continue to deliver, despite the challenging broader context. Our cleaning teams have also become frontline workers. It was a challenge, and a very personal concern of mine, to keep them all safe.”

TONY GORGOVSKI
CHIEF EXECUTIVE OFFICER

The emergence of COVID-19 was a game-changer for the cleaning industry. BIC played a leading role in managing that change for our clients, our operations and our employees.

In late January, BIC became aware that something profound was afoot. We made a conscious decision to be ahead of the curve in our response, beginning with informing our staff, who were soon to become – in the eyes of society – ‘frontline workers’.

In practical terms, we reinvented our business. We created a Pandemic Action Committee, which initially met daily (now fortnightly) to discuss the latest developments and their implications for our work. Our focus became pre-empting our clients’ challenges, for example, making sure buildings would not be forced to close down and that tenants could come back to work and feel safe.

We provided the goods our workers and clients needed to survive COVID, distributing masks and other critical equipment. BIC was and remains the sole Australian distributor of GermXit, an all-natural air purifier for use in commercial buildings, which has been shown to effectively kill human coronaviruses. BIC was also an early buyer of Viraclean, a Therapeutic Goods Administration-approved chemical that can kill COVID, which we stockpiled.

As an enhancement of our normal operations, we implemented ‘refresher’ and high touch point cleans for our clients during the day, when we realised that our work needed to become visible. As well as the actual hygiene, our clients needed to be comforted and reassured by the perception that their workplaces were clean.

Our GM People & Culture also wrote the first pandemic cleaning scope in Australia, which our clients greatly appreciated. We also wrote tailored site-specific return to work programs for our clients to ensure their tenants felt secure when reoccupying the building.

Caring for our employees was foremost in our minds over the calendar year 2020. This included safeguarding against any increase in modern slavery risks as a result of COVID-19. Our actions below included a number of initiatives, subsequently recommended as best-practice in [the Australian Border Force guidance](#):

- **An increased focus on training** to ensure staff are equipped to handle the pandemic. Through the BIC Training Academy, we rolled out training courses, and a training video specifically for pandemic cleaning.
- **Improved levels of personal protection equipment (PPE)**, including complimentary personal-use reusable masks for every employee, given the heightened risk our employees faced as frontline workers.
- **Maintaining employment for our employees** through the negotiations we undertook with the unions to relax the minimum engagement of a four-hour shift, so that employees could job share and retain vital income.

In terms of identifying and mitigating our modern slavery risks, COVID-19 has not materially changed our risk profile nor slowed down our due diligence and preventive efforts. In fact, over the duration of 2020, BIC continued to simplify our supplier base and to actively engage with our suppliers on modern slavery safeguards. Simultaneously, we continued to implement our broad Modern Slavery Framework and pursue the actions within it, as detailed elsewhere within this statement.

4. IDENTIFYING OUR MODERN SLAVERY RISKS

As already acknowledged, the cleaning industry can be highly susceptible to modern slavery risks, via common practices such as subcontracting, employment of migrant workers, as well as the high volume, time-pressured and often base-skilled nature of the work itself. BIC takes these risks seriously and has deployed safeguards in every aspect of its business, from our operations to our supply chain. The Board has oversight of managing the risks by monitoring compliance in our human resources and supply chain.

In our operations

Two inquiries conducted by the Fair Work Ombudsman have identified modern slavery risks in the cleaning industry as including breach of workplace laws, fraudulent subcontracting arrangements, below-minimum cash wage payments and poor job security. These inquiries and others led to the establishment of the Cleaning Accountability Framework, of which BIC is a proud member.

Both through CAF and our own independent efforts, BIC stands firmly against the risk that the cleaning industry becomes a 'race to the bottom', with all the human rights and modern slavery risks that introduces.

Despite the risks in the broader industry, BIC has identified the residual risk of modern slavery in its own operations as low. This is due partly to the robust safeguards we have implemented and partly to the decisions we have made about the structure and nature of our business.

BIC differs from competitors in ways that lower our vulnerability to modern slavery practices. Our points of difference begin with our business model. We favour an approach in which those working for us are actually part of our business, rather than simply subcontracting the cleaning work. This provides us with direct oversight of our cleaning teams and gives our workers access to all our internal safeguards against unfair work practices. Our supervisory network (consisting of our CEO, GM – Operations, Regional Managers, Executive Managers and Cleaning Supervisors) are committed to delivering multiple levels of support and ongoing monitoring of our on-site personnel.

Furthermore, all of our direct workforce is located in Australia and all employees have Australian work rights with visas vetted by the Department of Immigration. This ensures compliance with current legislation and best practice to safeguard the interests of employees, prospective employees and others working for BIC. At induction, all new staff are issued with comprehensive information covering BIC's ethical and human rights policies, Fairwork Ombudsman Information, National Employment Standards, Visa Holders and Migrant Workers workplace rights and entitlements, to name a few.

BIC has long been an industry leader in driving change across the cleaning industry to help provide fair and equitable incomes to our cleaners. We developed our Project Equity program to negotiate above-industry wage rates for employees, in partnerships with like-minded ethical clients. The program encourages clients to pay these rates by demonstrating the benefits that accrue by doing so.

In our supply chain

BIC uses a select range of suppliers for the provision of cleaning chemicals, equipment, uniforms, and specialists in the areas of high-rise window cleaning, hygiene and waste removal. Some of these sectors – such as uniforms – are widely recognised as being high-risk because materials are typically sourced, and products manufactured, globally.

As mentioned earlier, to identify the risks of modern slavery in our supply chain, we conducted an in-depth investigation and review in 2019 of our Tier 1 suppliers. This showed that the risk of modern slavery is low in our Tier 1 suppliers.

Our procurement review also led to action to limit the risk of modern slavery practices emerging in our supply chain. These steps included consolidating our supplier base – reducing the number of our suppliers from 57 to 37 – and shifting from contractors in high-risk countries to Australian and Indigenous suppliers. The screening process favoured operators whose modern slavery and human rights policies were aligned with our own.

We acknowledge that our lower tier suppliers are harder to monitor. In the next 12 months, we will seek to improve our processes around identifying multi-tier supply chain risks, work that will include requiring Tier 1 to demonstrate how these risks are being identified and managed. Some of our suppliers are already highly active in assessing and setting safeguards for their own supply chains (our lower-tier suppliers), which BIC recognises as part of our selection process when we tender our work.

Further, BIC has engaged 100% of our current high risk suppliers specifically on modern slavery through our Cm3 supplier portal, receiving information and confirmation of their compliance with our MSF and Human Rights Policy.

CASE STUDY: AN AUDIT OF OUR LARGEST SUPPLIER

On paper, our largest supplier of cleaning products, Bunzl, is classified as high risk, given the number – over 60 – and geographical profile of the materials and products they source. On that basis, we undertook an audit of Bunzl in 2019.

Our audit showed that Bunzl's efforts to identify and mitigate their modern slavery risks were very advanced. The company has adopted a zero tolerance to any form of modern slavery and has policies and procedures in place, including a Code of Conduct. All of these are aligned with the UN Universal Declaration of Human Rights, local legislative requirements and the UK and Australian Modern Slavery Act.

Bunzl monitors its supply chain and conducts regular supplier audits focused on their sourcing from Asia. The audits, of which there are approximately 700 conducted each year, cover 12 Asian countries and 98 percent of their Asian spend, and includes factory tours and interviews with factory workers. Bunzl's audit programme is sufficiently extensive that the company provides audit training for all their supplier factories.

As a very large company with headquarters in London, Bunzl has issued multiple Modern Slavery and Human Trafficking statements under the UK's Modern Slavery Act.

5. OUR ACTIONS

Modern slavery requires a comprehensive, all-of-business response. We have established appropriate governance arrangements to give effect to our Modern Slavery Framework, which will implement and ensure safeguards across all aspects of the business.

A. OUR GOVERNANCE OF MODERN SLAVERY

MODERN SLAVERY STEERING COMMITTEE

In November 2019, in recognition of the need for an all-of-business response to the problem, we established a Modern Slavery Steering Committee to review, evaluate and measure compliance and drive improvements in our operating procedures and along our supply chain. The committee is made up of members of the leadership team, including our CEO, GM – Sustainability & Procurement, GM – People & Culture, HR Manager, Training & Compliance Manager and GM – Operations. The committee is responsible for reviewing and revising our Modern Slavery Framework where necessary. This includes analysing the effectiveness of the current framework, and incorporating the lessons, challenges and achievements from the previous year. The Committee has met monthly since its inception.

MODERN SLAVERY FRAMEWORK

Our Modern Slavery Framework guides our actions and ensures a comprehensive all-of-business response to the issue of modern slavery. BIC understands that we can demonstrate a true commitment to tackling modern slavery by achieving the targets we set within our framework, and through transparent reporting on those actions.

We have already made significant progress. The following sections illustrate the action we've taken so far and – where relevant – indicate steps to be taken in the near future. Our full MSF is available on page 16.

B. IN OUR INDUSTRY

CLEANING ACCOUNTABILITY FRAMEWORK (CAF)

CAF is a multi-stakeholder voluntary partnership established to improve cleaning and labour standards in the cleaning industry. BIC has established a strong relationship with CAF and is committed to maintaining it. Specifically, the objectives of CAF and BIC are to:

- Develop a new standard for cleaning services in the property services industry which balances quality cleaning services and fair working conditions with value for money
- Develop a method to assess the performance of cleaning contractors and building owners/managers in order to:
 - drive compliance and create confidence that the new standards are being implemented
 - allow a platform for the promotion of those companies who go over-and-above the minimum compliance standard. It is closely aligned with the new modern slavery legislation.

CAF is an attempt by these organisations to move beyond a reliance on contractual and legal obligations in the supply chain, to one that is focused on improving transparency in decision making, capacity building and enhancing monitoring and reporting of cleaning and labour standards performance.

BIC is one of CAF's first contractor members, and currently one of only three pre-qualified contractors Australia-wide. As a CAF member, we are passionately committed to complying with the standards and helping drive change across the industry. To this end, BIC's GM – People & Culture, Claudia Di Bello – is the only cleaning contractor staff member who has a seat on every CAF sub-committee. BIC has been instrumental in developing the three-star CAF Certification Scheme, CAF Pricing Schedule and tender tools.

EARNING CAF CONTRACTOR PRE-QUALIFICATION

The process of CAF Prequalification involves an assessment of the adequacy of a cleaning contractor's management and HR systems to facilitate compliance with the CAF 3 Star Standard. By receiving a CAF Contractor Pre-qualification status, we have proven the readiness of our business policies, practices and systems to assure our workers' rights and safeguard against the risk of labour and human rights abuses. We have demonstrated that our company has:

- Adequate management systems in place to provide correct wages and conditions and superannuation, including appropriate record keeping systems
- Processes to educate cleaners about their workplace rights and conditions of employment
- Policies, procedures and systems in place to provide cleaners with paid and unpaid leave entitlements
- Systems to verify and monitor visa holders' right to work in Australia
- Financial viability
- Adequate WHS systems, policies and procedures to provide cleaners with a safe work environment
- Mechanisms in place to reduce the risk of worker exploitation, such as sham contracting, underpayment, modern slavery, etc.
- Considered ways in which we can provide cleaners with job security at a change of contract.

BIC is committed to maintaining its pre-qualification status because of the assurance it provides to us and our clients about our labour standards.

5. OUR ACTIONS

C. OUR POLICIES AND POLICY REVIEW

OUR POLICIES

BIC has a strong set of policies to support human rights in its own business and supply chain. We require direct suppliers to comply with all applicable laws and regulations and with our Human Rights Policy, Modern Slavery Framework and Code of Conduct. Suppliers are expected to maintain fundamental human rights standards and adopt similar policies in their own businesses.

Our Human Rights Policy sets out BIC's requirements and expectations of our employees, noting that they also extend to our direct suppliers, who are expected to uphold them. The policy notes that BIC is strongly opposed to all human rights violations and prohibits the use of forced labour or modern forms of slavery. It prohibits the hiring of individuals that are under 18 years of age for positions in which hazardous work is required, and notes that BIC will not knowingly do business with suppliers that illegally or improperly employ underage workers.

Our Code of Conduct defines how BIC employees should act on a day-to-day basis, reflecting the company's daily operations, core values and overall company culture. The code also outlines our expectations regarding employees' standards of behaviour when interacting with clients, colleagues and the company as a whole. It begins with compliance with the law, explicitly including employment laws. It also emphasises the importance of following BIC's expressed core values, one of which is our Commitment to Employees, whereby BIC strives to achieve a harmonious workplace and higher incomes for our employees.

2020 POLICY REVIEW

In preparation for meeting our reporting obligations for the Modern Slavery Act, BIC conducted a review of all policies and procedures to ensure that these were consistent and effective in responding to the Act. Partly as a result of this review, we are strengthening and improving our operational practices to enable us to more readily identify vulnerable people in our business. These are currently subject to ongoing reviews during our monthly executive team meetings. We are also improving our systems through our certified Integrated Management System to ensure the principles of BIC's Human Rights Policy are faithfully enacted across the business.

D. TRAINING AND AWARENESS RAISING

MODERN SLAVERY TRAINING FOR OUR LEADERSHIP

All of our existing management staff have now completed the Modern Slavery in Australia eLearning course, a comprehensive online program which covers all forms of slavery and human trafficking, including international conventions, Australian legislation and specific content on trafficking, slavery, servitude, forced labour, forced marriage, debt bondage, child labour and organ trafficking (<https://antislavery.org.au/training-advisory/#e-learning>). This training is now a standard part of induction for all new management staff.

BIC TRAINING ACADEMY

BIC has developed its own Training Academy of Excellence to induct, train and continually educate our employees. The Academy is an industry-first and an innovative solution to ensuring best-in-class training for our cleaning teams. Modern slavery is now a core component of the training our employees receive. Among other aspects, the Academy helps raise awareness for detecting and preventing human trafficking by training employees in modern slavery risk indicators.

MODERN SLAVERY AWARENESS RAISING AND COMMUNICATIONS

As part of our responsibility to combat modern slavery we ensure that employees, clients, partners and other stakeholders are aware of our commitments. We do this through all available channels, including our newsletters, blog and LinkedIn, as well as our CEO updates, trade show presentations and InClean magazine articles. Our intention is simple: to send a clear message that BIC will not tolerate any form of exploitation in our business or supply chain, nor the wider industry.

THE BIC SCHOLARSHIP PROGRAM

In 2020, we elevated our investment in our people by offering three fully funded scholarships. The BIC Scholarship Program, which is designed to provide financial support for marginalised staff studying in Australia, will continue into the future and in 2021, we will also be seeking education partnerships to provide scholarships to support Aboriginal and Torres Strait Islander youth. This investment helps some of the most vulnerable people across the country.

For more information go to: https://www.linkedin.com/posts/bicservices_bicscholarshipprogram-supportandgrowth-activity-6631396638000848896-Bdyd and https://www.linkedin.com/posts/bicservices_we-are-excited-to-announce-that-lucia-lopez-activity-6726303468442787840-xkxk

5. OUR ACTIONS

E. OUR SUPPLY CHAIN

PROCUREMENT REVIEW, INCLUDING SUPPLIER AGREEMENTS, KPIs AND SUPPLIER COMPLIANCE PORTAL

As mentioned, a review of our supply chain in 2019 led us to consolidate our supplier base, shift from high-risk countries to Australian and Indigenous suppliers, where possible, and reduce the number of our suppliers from 57 to 37. We introduced a supplier management portal with pre-qualifications, service agreements and corresponding KPIs, and supplier audits to ensure transparency and consistency throughout the chain.

BIC aims to source goods and services efficiently and fairly, engaging suppliers who share BIC's beliefs in responsible supply chain management and core values. We ensure due diligence is undertaken before entering into any supplier relationship and in-line with BIC's Rules of Engagement for Suppliers. When looking at engaging a supplier, we ensure they are reputable and Cm3 pre-qualified as a minimum.

Suppliers are expected to maintain fundamental labour and human rights standards and comply with all applicable laws and regulations of the jurisdictions in which the suppliers are doing business, including employment laws, maintain just and decent working conditions, share BIC's respect for the environment and implement sound security measures. In 2020, BIC completed a Register of Approved Suppliers using the Cm3 platform. The Register ensures our high risk suppliers are pre-qualified in ethical, health and safety standards and onboarded in-line with BIC's Rules of Engagement for Suppliers.

In 2019, suppliers were required to complete and upload BIC's Modern Slavery Survey into Cm3. In 2021, BIC suppliers will also be required to provide a Modern Slavery Statement to BIC, irrespective of annual turnover.

In the case of breaches of BIC's Human Rights Policy or Code of Conduct, suppliers will be required to provide remedial actions. Where necessary, depending on the severity of the breach, BIC will establish corrective action plans to support suppliers in developing their capabilities and improve their performance.

BIC is committed to working in partnership with its suppliers to help achieve compliance with Modern Slavery legislation. In the event where any supplier is unwilling or unable to demonstrate continuous improvement towards full compliance, the trading agreement between BIC and the supplier will be terminated.

F. WHISTLEBLOWING PROTECTION, REMEDIATION AND VICTIM SUPPORT

BIC has established a Whistleblowing Policy to encourage and protect those reporting possible human rights or modern slavery abuses within the business. We are committed to working closely with law enforcement to respond to any reported modern slavery instances, though to date this has not been required. We are also committed to providing ongoing assistance and support for any victims of modern slavery relating to our business.

Beyond the business, we have begun to use the charity portal Good2Give to work closely with community organisations and charities dedicated to ensuring modern slavery victims receive the support and help they need. In 2021 we will explore how we can expand these efforts by donating management time to volunteer programs and initiatives.



6. ASSESSING EFFECTIVENESS

Many of the steps initially identified in our Modern Slavery Framework have been successfully implemented. These include establishing the Modern Slavery Steering Committee, achieving CAF contractor pre-qualification status, conducting a procurement investigation and robust tendering process, and conducting a review of all policies relevant to modern slavery. By their nature, many of these actions are one-offs. Other actions are expected to continue, providing a basis for internal and external reporting of our progress.

In assessing the effectiveness of our approach to modern slavery, the following performance indicators will be used. Where possible, we have included our initial performance against these indicators for FY20.

Action	Performance indicator	Our FY20 performance
Modern Slavery Steering Committee	<ul style="list-style-type: none"> Meeting frequency MSF reviewed annually 	Monthly meetings since established in November 2019 (8)
CAF pre-qualification contractor member	<ul style="list-style-type: none"> Annual certification against CAF as a contractor member 	Last renewed February 2021
CAF pre-qualification contractor member	<ul style="list-style-type: none"> Percentage (%) of suppliers accepted to BIC's Register of Approved Suppliers, including conformance with BIC's human rights policy and modern slavery 	100%
Supplier breaches	<ul style="list-style-type: none"> Number of breaches of BIC's Human Rights Policy or Code of Conduct Number of corrective action plans agreed (and progress) 	0 0
Training	<ul style="list-style-type: none"> Percentage (%) of BIC's management team trained to recognise and safeguard against modern slavery risks Percentage (%) of BIC's staff trained to recognise and safeguard against modern slavery risks 	100% 100%
Modern slavery instances	<ul style="list-style-type: none"> Instances detected Instances remedied (and how) 	0 0

7. THE WAY FORWARD

Our Modern Slavery Framework was developed to ensure a consistent all-of-business response to the risk of modern slavery within our business and industry. A crucial action was establishing BIC's Modern Slavery Steering Committee, to provide ongoing oversight of our efforts. The MSF is subject to review by the Steering Committee, to ensure it remains fit for purpose in an evolving business and regulatory environment.

Our Modern Slavery Framework is detailed in full below. Most of the actions set out here have already been enacted, with some completed and others ongoing with periodic review.

Action	Deliverable	Responsibility
Establish a Modern Slavery Steering Committee (MSSC).	<ul style="list-style-type: none"> Form a Modern Slavery Steering Committee who will review, evaluate and measure compliance and drive improvements along its supply chain and operating procedures. 	CEO, GM – Sustainability & Procurement, GM – People & Culture, HR Manager, Training & Compliance Manager, GM – Operations.
Build and strengthen internal and external relationships.	<ul style="list-style-type: none"> Maintain a Register of Approved Suppliers through our Cm3 platform to ensure our high risk suppliers are pre-qualified in ethical, health and safety standards and onboarded in-line with BIC's Rules of Engagement for Suppliers. These procedural controls are regularly reviewed to ensure that we continue to minimise the risk of modern slavery in our operations and supply chain. Maintain a robust procurement process to ensure due diligence is undertaken before entering into any supplier relationship and in-line with BIC's Rules of Engagement for Suppliers. Maintain our strong relationship with The Cleaning Accountability Framework (CAF) and the numerous multi-stakeholder partnerships to improve cleaning and labour standards in the cleaning industry Develop a list of other like-minded organisations, both client-based and suppliers, and maintain multi-stakeholder collaboration to raise awareness and mitigate modern slavery risks through the whole supply chain. 	<p>GM – Sustainability & Procurement, Training & Compliance Manager, HR Manager.</p> <p>GM – Sustainability & Procurement, Training & Compliance Manager, GM – Operations.</p> <p>CEO, GM – People & Culture.</p>
Communicate our Human Rights Policy and Modern Slavery Framework commitments internally and externally.	<ul style="list-style-type: none"> Communicate to internal staff, partners and stakeholders our modern slavery commitments through the BIC Training Academy, BIC Connect, Toolbox Talks, Newsletters and ongoing management/staff workshop and training programs. Promote our commitments via professional media, Client Newsletters and BIC blogs via our website and LinkedIn. Develop and implement a strategic plan to engage and ensure key internal stakeholders commit to their responsibilities in combating modern slavery, through inductions, training and ongoing on-site engagement with CAF Representatives. 	<p>CEO, GM – Sustainability & Procurement, GM – People & Culture, HR Manager, Training & Compliance Manager, GM – Operations.</p> <p>Marketing & Communications Manager, GM – People & Culture, HR Manager, Training & Compliance Manager.</p> <p>Marketing & Communications Manager, GM – People & Culture, HR Manager, Training & Compliance Manager.</p> <p>GM – People & Culture, HR Manager, Training & Compliance Manager.</p>

7. THE WAY FORWARD

Action	Deliverable	Responsibility
<p>Raise awareness.</p>	<ul style="list-style-type: none"> Ensure all management staff undertake training programs to increase awareness about all forms of modern slavery, the indicators of modern slavery, protections that are available, best practice and referral pathways. https://antislavery.org.au/training-advisory/#e-learning. We will continue to develop our understanding of those that engage in modern slavery crime. This is crucial to enabling us to most effectively target messaging aimed at stopping people becoming involved in modern slavery crime in the first place, as well as deterring offenders from continuing. We will widely publicise the details of our awareness campaigns and initiatives to tackle modern slavery, sending a clear message that BIC will not tolerate any form of exploitation. 	<p>GM – People & Culture, HR Manager, Training & Compliance Manager, BIC Managers.</p> <p>GM – People & Culture, HR Manager, Training & Compliance Manager.</p> <p>Marketing & Communications Manager, GM – People & Culture, HR Manager, Training & Compliance Manager.</p>
<p>Explore opportunities to facilitate reporting of modern slavery crimes.</p>	<ul style="list-style-type: none"> Implement and develop BIC Connect to allow confidential and anonymous reporting (whistle blowing) of modern slavery crimes and encourage participation. Work closely with law enforcement to respond to reported modern slavery crimes. We will strengthen and improve our operational practice to enable us to more readily identify the vulnerable, through workplace employee engagement. 	<p>CIO, GM – People & Culture, HR Manager, Training & Compliance Manager.</p> <p>GM – People & Culture, HR Manager, Training & Compliance Manager.</p> <p>GM – People & Culture, HR Manager, Training & Compliance Manager, GM – Sustainability & Procurement, Managers.</p>
<p>Assist victims of modern slavery.</p>	<ul style="list-style-type: none"> Provide ongoing assistance and support for victims of modern slavery, e.g. through EPAs, financial support, mentoring and workplace support. Work closely with community organisation and charities dedicated to ensuring victims receive the support and help they need. 	<p>GM – People & Culture, HR Manager, Training & Compliance Manager.</p> <p>GM – People & Culture, HR Manager, Training & Compliance Manager.</p>
<p>Maintain systems and processes to comply with BIC's Human Rights Policy.</p>	<ul style="list-style-type: none"> Maintain operating systems to deliver services which are aligned with BIC's Human Rights Policy and its requirements and deliver ongoing transparency. 	<p>CIO, GM – People & Culture, HR Manager, Training & Compliance Manager, GM – Sustainability & Procurement, Managers.</p>

7. THE WAY FORWARD

Action	Deliverable	Responsibility
<p>Transparency of supply chains.</p>	<ul style="list-style-type: none"> • Prepare a modern slavery statement complying with the MSA 2018 each financial year to ensure that its goods and services are not a product of supply chains in which modern slavery is taking place. • Make BIC's modern slavery statement public via our website in accordance with the regulations and include information about the following: <ul style="list-style-type: none"> - the organisation's structure, its business and its supply chains - its due diligence processes in relation to modern slavery in its business and supply chains - the parts of its business and supply chains where there is a risk of modern slavery taking place, and the steps it has taken to assess and manage that risk - the training about modern slavery available to its employees. • BIC Suppliers will be expected to maintain fundamental labour and human rights standards as described in BIC's Human Rights Policy, MSF and the MSA 2018. • BIC Suppliers will be required to provide a modern slavery statement to BIC, irrespective of annual turnover. • Breaches of the BIC's Human Rights Policy: <ul style="list-style-type: none"> - Suppliers to provide rectification actions of any breaches, e.g. depending on the severity of the breach, where possible, BIC will establish corrective action plans to support suppliers in developing their capabilities and improve their performance. - Termination will occur if the supplier violates the BIC's Human Rights Policy and actions plans are not implemented. 	<p>GM – People & Culture, HR Manager, Training & Compliance Manager, GM – Sustainability & Procurement.</p> <p>GM – People & Culture</p> <p>GM – Sustainability & Procurement, Supply chain.</p> <p>GM – Sustainability & Procurement, Supply chain.</p> <p>GM – Sustainability & Procurement, Supply chain.</p>
<p>Report on modern slavery challenges and learnings.</p>	<ul style="list-style-type: none"> • Establish a process for information gathering, reporting templates and monitoring of modern slavery issues. • Report monthly to BIC's Modern Slavery Steering Committee on effectiveness, issues and feedback. 	<p>CIO, GM – Sustainability & Procurement, GM – People & Culture, Training & Compliance Manager.</p>
<p>Ensure internal compliance and governance.</p>	<ul style="list-style-type: none"> • In line with our Human Rights Policy and related compliance guidelines, ensure consistency across the BIC business by continually educating our leaders in Modern Slavery risks and maintaining our Cm3 Supplier compliance portal. • Maintain CAF Pre-certification status 	<p>Quality Manager, GM – Sustainability & Procurement, GM – People & Culture, Training & Compliance Manager.</p> <p>GM – People & Culture.</p>
<p>Review and refresh.</p>	<ul style="list-style-type: none"> • Consult and liaise with BIC's Modern Slavery Steering Committee to develop a revised framework as required, including annual reporting based on the effectiveness of the current framework and learnings, challenges and achievements from the previous year. 	<p>GM – Sustainability & Procurement, GM – People & Culture, Training & Compliance Manager.</p>