



Modern Slavery Policy

Purpose

This policy sets out the commitment of The Bendigo Cleaning Co. ("TBCC", "we", "our" or "us") to identifying, preventing and addressing modern slavery in our own operations and in our supply chains, and to supporting our clients and business partners who have reporting obligations under the Modern Slavery Act 2018 (Cth) ("the Act"). Modern slavery has no place in our business or in the businesses we work with, and this policy is intended to be read alongside our other workplace, procurement and employment policies.

- **Prevent and Respond** — identifying modern slavery risk in our own operations and supply chains, and acting promptly and appropriately wherever risk, or an actual instance, is identified.
- **Support** — supporting our clients and business partners who are subject to mandatory reporting obligations under the Act, by being transparent with them about our workforce and supply chain practices.

Scope

This policy applies to all TBCC directors, employees, contractors, subcontractors, labour-hire personnel and suppliers, and to all sites, contracts and procurement activity across our operations. It covers our direct workforce and, so far as we are able to assess it, our supply chain, including suppliers of cleaning chemicals, consumables, equipment and uniforms, and any subcontracted or labour-hire cleaning services we engage.

Definitions

Modern Slavery: the umbrella term used in the Act to describe situations where coercion, threats or deception are used to exploit victims and undermine their freedom, including slavery, servitude, forced labour, forced marriage, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

Forced Labour: work or service extracted from a person under threat of penalty, and for which the person has not offered themselves voluntarily.

Debt Bondage: a situation where a person's services are pledged as security for a debt, and the value of those services is not reasonably applied to reducing the debt, or the length and nature of the services are not limited or defined.

Deceptive Recruiting for Labour or Services: recruiting a person for work or services by deceiving them about whether they will be exploited, or about the nature of the work, the conditions of work, or the terms of their engagement.

Supply Chain: the sequence of processes and organisations involved in producing and supplying goods or services to TBCC, from the original source through to delivery to us.

Due Diligence: the ongoing process of identifying, assessing and addressing actual or potential adverse modern slavery impacts connected with our operations and supply chains.

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Remediation: the process of providing or enabling redress for an actual adverse modern slavery impact — for example, ensuring back-payment of wages owed, or connecting an affected person to appropriate support services.

Policy Statement

TBCC is committed to:

- Zero tolerance of modern slavery, forced labour or exploitative practices anywhere in our business or supply chains.
- Applying risk-based, proportionate due diligence to our workforce and supply chain, reflecting our size and the nature of our operations.
- Providing fair pay and safe working conditions for our own people, and expecting the same of our suppliers and subcontractors.
- Maintaining transparent, accessible grievance channels, and protecting anyone who raises a concern in good faith from retaliation.
- Being transparent with clients and business partners who rely on us as part of their own mandatory reporting under the Act.

Our Legal and Regulatory Context

The Act requires Australian entities with annual consolidated revenue of at least \$100 million to publish an annual Modern Slavery Statement describing the risks of modern slavery in their operations and supply chains and the actions taken to address them. TBCC currently sits below this reporting threshold and is not itself a mandatory reporting entity, but we frequently act as a supplier and subcontractor to businesses and government agencies that are, and we take our responsibility to support their due diligence seriously.

An independent Anti-Slavery Commissioner was established under the Act in December 2024 to promote compliance and best practice, raise community awareness, and help people who have experienced modern slavery access support and remedies. The Australian Government has also been consulting on further reforms recommended by the 2023 statutory review of the Act, including a proposed positive duty to conduct due diligence and civil penalties for non-compliance by large reporting entities. These reforms had not been enacted as at the last review of this policy, and we will update this policy as the legal framework develops.

Our Modern Slavery Risk Profile

Objectives

- Understand where modern slavery risk is most likely to arise in our own workforce and in our supply chain.

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- Ensure that risk assessment genuinely informs how we recruit, engage subcontractors, and select suppliers.
- Focus our limited resources, as a small-to-medium business, on the risks that matter most in our sector.

Recognised Risk Factors

- Subcontracting and labour-hire arrangements, which can reduce visibility over how workers are actually engaged, rostered and paid.
- Reliance by some workers — particularly recent migrants and workers on employer-sponsored or student visas — on their employer for their visa status, which can increase vulnerability to exploitation.
- Underpayment and non-compliance with modern award obligations, an issue the Fair Work Ombudsman and the Cleaning Accountability Framework have repeatedly identified as widespread in the commercial cleaning sector.
- Recruitment practices involving fees charged to workers, or retention of personal identity or travel documents.
- Excessive, unrostered or unrecorded overtime, particularly where cleaning work is performed outside normal business hours with limited supervision.
- Contract pricing pressure across the cleaning industry, which can create incentives for underpayment further down a supply chain if left unchecked.

Our Assessment

TBCC directly employs its cleaning workforce rather than relying on subcontracted or labour-hire labour, which reduces — but does not eliminate — our exposure to these risks. Our principal areas of residual exposure are further up our supply chain, in categories such as cleaning chemicals, consumables, equipment and uniforms, where our visibility over upstream manufacturing and labour practices is more limited.

Our Actions to Address Modern Slavery

Fair Pay & Conditions

- Pay all employees at least the applicable modern award or enterprise agreement rate, and keep accurate time and wage records for every employee.
- Engage our workforce through TBCC's own payroll, with written employment terms for every employee — not informal or cash-in-hand arrangements.
- Monitor rostered and actual hours to guard against unrecorded or excessive overtime.

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Staff Support & Grievance

- Provide induction and workplace information in a form our employees can understand, including for employees whose first language is not English.
- Maintain accessible, confidential channels for any employee to raise a concern, without fear of reprisal.
- Support employees who hold employer-sponsored or other visas to understand their workplace rights, independently of their visa status.

Supply Chain Due Diligence

- Assess new suppliers and subcontractors before engaging them, and prioritise established, reputable suppliers of chemicals, consumables, equipment and uniforms.
- Include modern slavery expectations in our supplier and subcontractor arrangements, and require subcontracted or labour-hire cleaning services to meet the same pay and conditions standards we apply to our own workforce.
- Raise concerns directly with a supplier or subcontractor where a modern slavery risk indicator is identified, and reassess the relationship if it is not addressed.

Sector Engagement & Leadership

- Share our approach to modern slavery with clients and business partners who request it to support their own due diligence and reporting.
- Stay engaged with sector guidance on modern slavery risk in commercial cleaning, including from bodies such as the Cleaning Accountability Framework and the Australian Border Force.
- Encourage the same standards of fair pay and safe conditions among our industry peers wherever we have the opportunity to influence them.

Training & Awareness

- Make this policy accessible to all employees, and to relevant contractors and subcontractors, as part of induction.
- Train supervisors and managers to recognise indicators of forced labour, underpayment and exploitation.
- Ensure every employee knows how to raise a concern about modern slavery, and what will happen if they do.

Monitoring & Reporting

- Review our workforce arrangements and key supplier and subcontractor relationships against this policy annually.

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- Report progress against this policy to TBCC leadership at least once a year.
- Extend our commitment beyond compliance — continuing to work towards eliminating underpayment and substandard working conditions across our own workforce and, where we can influence it, our supply chain.
- Review this policy annually, or earlier if our legal obligations or risk profile change materially.

Roles & Responsibilities

Leadership / Directors: own this policy, resource it appropriately, and are ultimately accountable for TBCC's response to modern slavery risk.

Operations & Procurement: apply the due diligence principles in this policy when engaging suppliers, subcontractors and labour-hire providers.

People & Culture / HR: run compliant recruitment and payroll practices, maintain accurate employment records, and ensure grievance channels are accessible and confidential.

All Employees: treat colleagues, contractors and subcontractors fairly, and raise any concern about possible exploitation promptly through the channels available to them.

Review and Updates

This policy will be reviewed annually, or as required to reflect changes to the Act, related regulatory guidance, or TBCC's operations and supply chain.

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