

# SPS MODERN SLAVERY STATEMENT

SPS has developed this Modern Slavery Statement (MSS) through consultation with employees and suppliers. This MSS has been approved by the Managing Director (MD) for SPS.

SPS is an organisation providing commercial cleaning services to both the private and public sectors within Australia. The majority of SPS's businesses operate in Australia and New Zealand, with branches located in Brisbane, Sydney, Perth, Townsville, Newcastle, Gladstone, and Dunedin.

SPS has a national supply chain of approximately 20 suppliers. Our supply chain relationships include suppliers from the following sectors: Information Technology, Consulting Services, Marketing, Promotional Goods and Services, Fleet Management, Office Supplies, Logistics and Corporate Clothing.

SPS seeks to do business with suppliers that have similar values, ethics, and sustainable business practices, including those related to human rights. SPS recognises that as a volume purchaser of goods and services, the business conduct and performance of its suppliers can have a significant impact on its performance and reputation within the communities in which it operates.

SPS understands that the various risks relating to suppliers will vary depending on their industry, geographic location, company size and therefore, the scope of SPS's suppliers' policies, processes and systems are expected to reflect their specific risks.

## SPS's policies and principles

One of SPS's core company values is 'respect for people'. SPS does not tolerate slavery, human trafficking, forced or child labor or exploitation. As an organisation, we understand the value that diversity and equal opportunity brings, and we ensure through our "on boarding" and induction programs that all direct employees and sub-contractors are afforded their rights as stipulated by all relevant legislative requirements. Our teams are provided on-site training to ensure understanding and compliance to our company value of "respect for people". SPS has various policies which assist in managing human rights and form the basis of our training in this area.

These include:

- Diversity in the Workplace Policy
- Equal Employment Opportunities Policy
- Employee Code of Conduct
- Supplier Code of Conduct
- SPS risk management and due diligence processes
- Independent Contractor Agreement (ICA)
- Modern Slavery Questionnaire – Supplier of Goods & Services
- Supplier Pre-Qualification document
- Supplier Induction record

As a commercial cleaning organisation with a professional workforce, SPS considers the risk of modern slavery within its direct business operations to be low.

This can be demonstrated by our commitment to ensure our migrant workforce has the information and knowledge required to ensure they receive fair and equal treatment to our non-immigrant workers.

SPS do not:

- take any financial payments from workers to secure employment,
- hold original passports or identity documents.
- Engage people without relevant visas allowing them to work.
- Hide information relating to work entitlements. Provision of Fair Work Information Statement is provided to all staff at commencement of employment.

However, SPS recognises that through its supply chain and customers, it can be indirectly exposed to the risk of modern slavery and human trafficking.

SPS has risk management processes that identify, assess, mitigate, and monitor potential risk areas where it could be exposed to human rights concerns, including modern slavery and human trafficking. This includes the Supplier code of conduct which requires each respective supplier to adopt the values that SPS would operate under. SPS also has various risk management and due diligence processes which demands transparency from suppliers and contractors on their compliance and alignment with SPS's zero tolerance to slavery and human trafficking, forced or child labor or child exploitation. All our suppliers and contractors complete our Modern Slavery Questionnaire prior to becoming a preferred supplier to SPS and again annually to ensure there have been no changes.

The Global Slavery Index (2018) lists the top 5 imported products at risk of modern slavery to Australia. The top two (2) of these products are computers and technology, and apparel and clothing accessories. SPS will ensure our supplier of these goods complies with our expectations and standards of ethical production. In addition, cleaning consumables and paper product suppliers will be audited to ensure compliance to our policy. These will be reviewed annually, and additional suppliers added to our internal audit schedule.

Ongoing review of our supply chain confirms these sectors continue to have the highest potential to expose SPS and its clients to modern slavery and human trafficking risks.

Actions undertaken to minimise these risks include:

- Continuing to position SPS as the ethical cleaning services contractor remunerating employees per the relevant Award within the cleaning industry
- Continuing to focus our supply chain risk assessment on material suppliers and suppliers.
- Ensuring any 3<sup>rd</sup> party contracting arrangements made with our partners are within current Award rates and conditions as stated under the Fair Work Act.
- Continuing to support responsible contracting of cleaning services and drive recognition of best-practice labour and cleaning standards.
- SPS Managing Director appointed as BSCAA (cleaning contractor's industry body) QLD president.

During the last financial year, SPS did not identify any form or instances of modern slavery, human trafficking associated directly with its operations. In risk assessments undertaken to date with regards to SPS's supply chain, no cases of modern slavery or human trafficking were identified.

SPS, in partnership with stakeholders, will continue with our due diligence to review and develop our Modern Slavery Statement as our risks and business model changes.

This Modern Slavery Statement will be reviewed each year in consultation with all relevant stakeholders.



## APPROVAL

On 1<sup>st</sup> July 2022, SPS's Modern Slavery Statement for FY2022-2023 was approved by the MD, acting as the principal governing body of Sharman Property Services Pty Ltd ABN 16011022209, trading as SPS.

Signed for, and as the Managing Director, Sharman Property Services Pty Ltd,

A handwritten signature in black ink, appearing to read "Mark Nipper", written over a light blue rectangular background.

Mark Nipper  
Managing Director  
SPS Facilities

SPS-BMS-POLICIES  
V6 (June 2023)

