



# MODERN SLAVERY STATEMENT

# ABOUT THIS STATEMENT

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) by the reporting entity BGIS Pty Ltd (ABN: 83 064 638 197) and its 6 subsidiaries (collectively “BGIS”) for the year ended 31 December 2020.



BGIS Pty Ltd makes this single joint statement on behalf of all 100% owned and controlled entities.

BGIS holds a 50% interest in Campus Living MAM Pty Ltd, and a 50% interest in MBM Integrated Health Services Pty Ltd. These entities are not subsidiaries of BGIS and therefore are not covered by this statement.

This statement was approved by the board of BGIS Pty Ltd on 25 June 2021.

# MODERN SLAVERY

Modern slavery is a serious violation of an individual’s dignity and human rights. Exploitative practices including human trafficking, slavery, servitude, forced labour, debt bondage and forced marriage are all considered modern slavery and are serious crimes under Australian law. On 1 January 2019, the Modern Slavery Act 2018 (the Act) commenced. The Act asks organisations to identify the risk of modern slavery occurring in their operations and supply chains and set out the steps they are taking to address the risk. BGIS Pty Ltd is pleased to submit its inaugural statement in accordance with the Act.



# MESSAGE FROM THE MANAGING DIRECTOR

Modern Slavery is a matter of concern to us. The human rights of our people, clients, vendors and communities are respected in our policies and the way we operate.



On behalf of BGIS in Australia and New Zealand, I am pleased to present our first Modern Slavery Statement aimed at addressing the reporting criteria outlined in the Modern Slavery Act 2018 (Commonwealth). We support a complex network of vendors and this is where we may be at risk of indirect exposure. This document is the foundation for us to identify where risks may exist in our operations and supply chain. BGIS has not had any instances related to Modern Slavery but we seek to proactively mitigate risks in the future.

Our focus on the mitigation of Modern Slavery is underpinned by a robust governance environment that challenges BGIS to continuously assess risk and improve supply chain transparency. We are committed to continuously improving to achieve long term change that will make a difference to modern slavery. BGIS understands that the efforts to identify and mitigate modern slavery risks in our operations and our supply chains is ongoing. We will seek to continuously refine and improve our approach in order that we effectively and transparently manage modern slavery risks for ourselves and our clients.

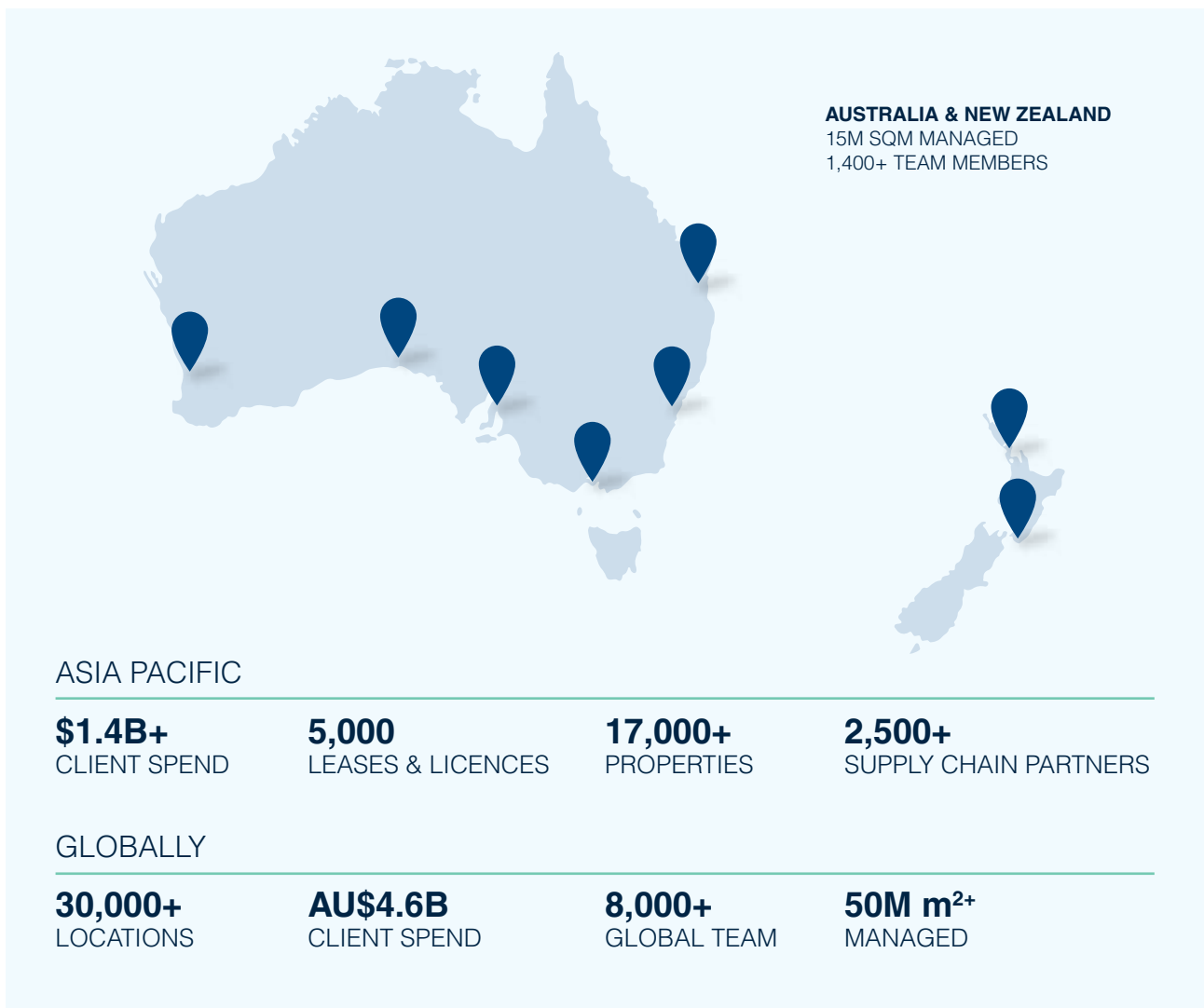
A handwritten signature in black ink, appearing to read 'Dana', with a long horizontal flourish extending to the right.

**Dana Nelson**  
President and Managing Director – APAC

# ABOUT US

We provide facility management, project and construction management, energy and sustainability solutions, asset management, building performance management, compliance management, workplace management and real estate services.

Our talented team of close to 1,400 people in Asia Pacific is supported by a global team of 8,000 people in Canada, USA and the United Kingdom. We deliver to clients in defence, justice, government, education, healthcare, utilities, finance, housing/ social housing, telecommunications, transportation, property, resources, oil & gas and sport & leisure. We manage 30,000 locations, totalling 31 million square metres of office and retail space, universities, schools, hospitals, stadiums, housing, bases, remote towns, warehouses, industrial assets and data centres.



# OUR SUPPLY CHAIN

Australian suppliers constitute 86% of the 2020 active BGIS Pty Ltd supply chain (and over 95% of the spend), with the remaining vendors located internationally.



## CATEGORY CHARACTERISTICS

### Facilities Management Services

This group of suppliers represents around half of the BGIS supply chain, both in spend and supplier volume. Services provided by these vendors primarily include labour based services of: cleaning, security services, grounds maintenance, air conditioning maintenance, electrical maintenance, hydraulic maintenance and fire systems maintenance.

### Industrial Consumables, Plant Hire & Equipment

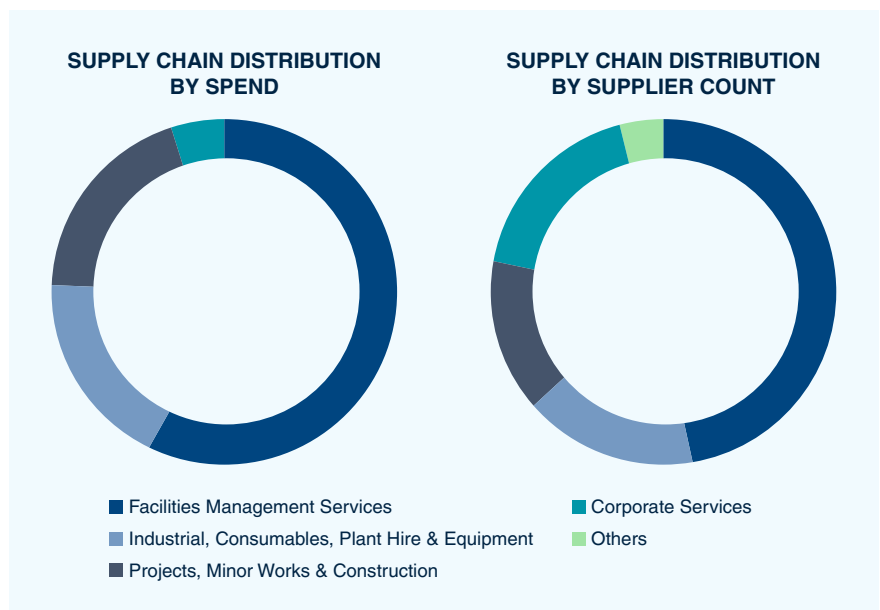
This category includes: industrial consumables and tools of trade, uniforms, PPE & safety equipment, catering / kitchen & laundry equipment, furniture and temporary plant hire.

### Projects, Minor Works & Construction

Minor works and construction activities include: demolition and construction, building fabric and carpentry, civil works, electrical systems, flooring supply and installation, roofing & guttering and professional project management services.

### Corporate Services

This area of our operations includes key corporate items including: travel & accommodation, IT software and equipment, telephony, stationery and professional services such as finance, legal and other consultants.



# MODERN SLAVERY RISKS

BGIS Pty Ltd operations are primarily Australian based, which has a low inherent risk profile of modern slavery vulnerability. The highest concentration of modern slavery risk in our operations is within our supply chains, which are predominately labour based (see above ‘Our Supply Chain’) and international vendors. In 2020, BGIS reviewed its supply chain using a risk assessment and tiering model outlined below.

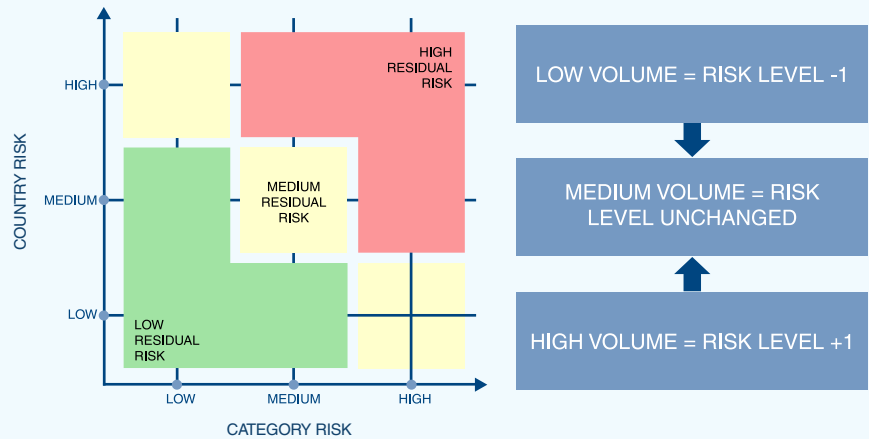
BGIS completed a risk assessment of its vulnerability to modern slavery practices in its supply chain based on the following:

- Country Slavery Risk/Global Slavery Indexation
- Industry & Category Risk
- Volume Risk

The assessments were graded along a matrix and resulted in the application of a residual

Low / Medium / High ranking for each vendor. The rankings then determine the audit and compliance activities that were to be conducted by BGIS with each tier of supplier (see below ‘Our Actions’).

Country and Category risks are first assessed, with residual risk ratings per the diagram above. BGIS volumes are then considered with Low volumes, reducing the residual risk rating by one tier and High volumes increasing the residual risk rating by one tier.



## Global Slavery Index

BGIS identifies modern slavery country risk using the Global Slavery Index published by the Minderoo / Walk Free Foundation (2018)\*. Walk Free Foundation uses cutting-edge prevalence estimation techniques including nationally-representative surveys in partnership with Gallup, risk-model extrapolation and Multiple Systems Estimation (MSE) to measure modern slavery globally. The index also assesses government responses to this issue and vulnerability structures that impact populations around the world.

BGIS applies a weighted methodology that leverages the GSI material based on the following:

- Prevalence of population in modern slavery (50%);
- Population Vulnerability (25%); and
- Government response (25%)

The resulting weighted scores are then graded to provide a residual country risk rating using a Low / Medium / High ranking. These rankings are allocated against the BGIS supply chain to identify modern slavery risk based on country of incorporation.

\* <https://www.globalslaveryindex.org/2018/data/country-data/australia/>

# MODERN SLAVERY RISKS

## Category Risk

BGIS procurement maintains an industry segmentation and taxonomy model across the BGIS Pty Ltd supply chain. This taxonomy has been indexed against modern slavery risk using a High / Medium / Low ranking methodology to identify likelihood of modern slavery by activity type.

The indexation is based upon the following industry attributes:

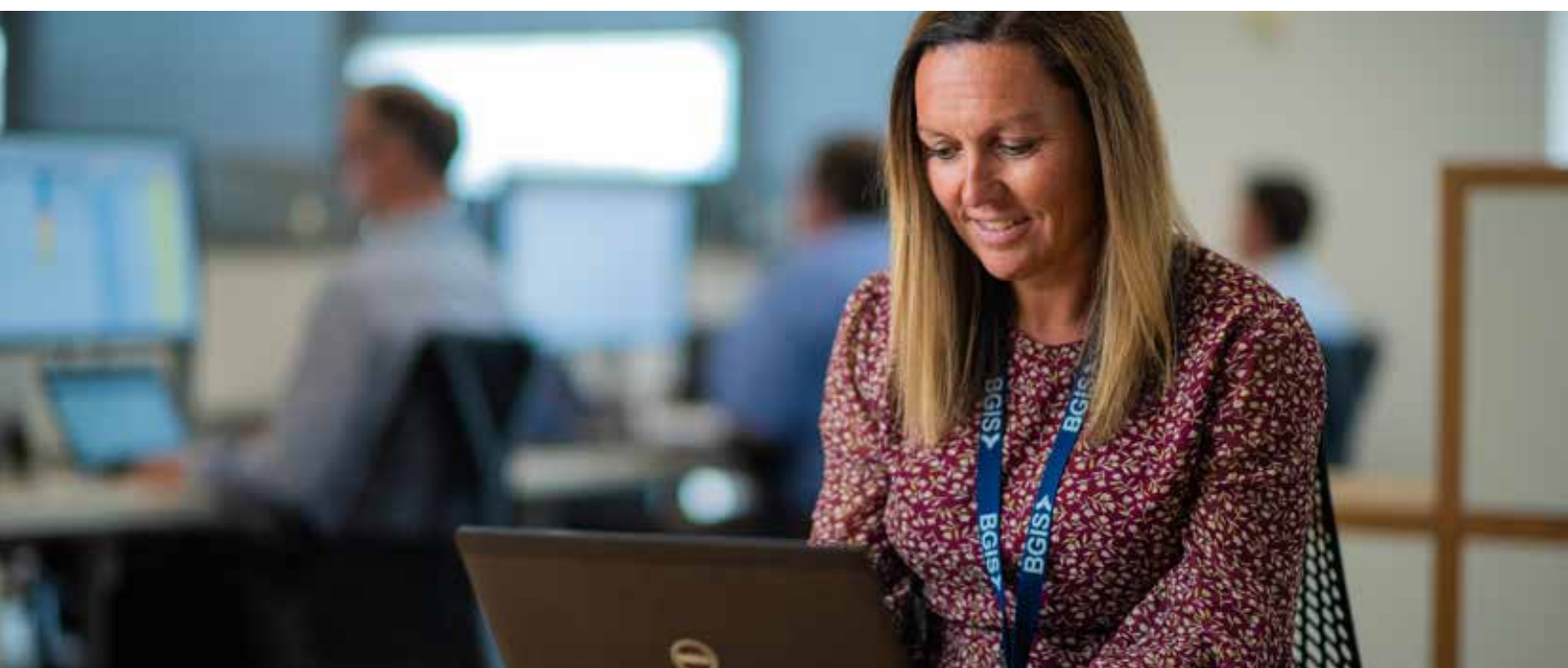
- Prevalence of high staff and employment volumes within the category;
- The relative wages and incomes of the staff employed in a given industry as a measure of income disadvantage and exploitation risk;
- The proportion of goods and materials likely to be sourced from 3rd parties and overseas supply chains; and
- Known high risk modern slavery industries such as textiles, electronics, food supply, cleaning and manufacturing.

The category indexation is then attributed against the BGIS supply chain to identify modern slavery risk based on industry of operation.

## The impact of Covid-19

BGIS understands that the Covid-19 pandemic has the capacity to heighten vulnerability to modern slavery practices in global supply chains. Our highest priority response to the pandemic has been toward the health and wellbeing of our people. Our employees were provided personal protective equipment (PPE) which met Australian quality standards and ISO certifications and BGIS also performed a central role in assisting the PPE sourcing efforts of our clients throughout the pandemic, including those within the health sector.

Additionally, early payment terms were introduced for large cohorts of our supply chain and BGIS materially expanded its engagement of Small and Medium enterprises (SME's) to reduce modern slavery vulnerability in 2020.



# OUR ACTIONS

<p><b>Policy, Procedure and Governance</b></p>	<p>Our commitments to reducing modern slavery vulnerability in BGIS operations and our supply chain are supported by a cohesive policy, procedural and governance framework.</p>
<p><b>Code of Business Conduct and Ethics</b></p>	<p>The Code serves as a guide for staff conduct as a member of the BGIS team. Preserving our corporate culture is vital to the organisation and following the Code helps us do that. All staff receive training and certify their commitment to the Code each year.</p>
<p><b>Modern Slavery Act Framework</b></p>	<p>Released in November 2019, the BGIS Modern Slavery Act framework sets out an understanding of the risks and mitigation strategies that BGIS has adopted in meeting its legislative obligations and CSR objectives. The framework identifies appropriate resourcing, staffing and a training agenda to support a strong corporate culture, setting short and long term key performance indicators to ensure a transparent and efficient approach to managing modern slavery vulnerability in the BGIS supply chain. The governance and review ecosystem of the framework are also set out in this framework.</p>
<p><b>Sustainable Procurement Framework</b></p>	<p>BGIS procurement has wholly adopted the principles of the ISO 20400 Sustainable Procurement – Guidance in its procurement policy, guidelines, compliance and audit activities and leadership and works toward giving these principles expression in all purchasing activities undertaken by BGIS procurement staff and the broader BGIS business.</p>
<p><b>Procurement Policy &amp; Sustainable Procurement Policy</b></p>	<p>The BGIS Procurement Policy begins with an overview of the BGIS procurement principles: Ethics, Safety &amp; Sustainability. Staff are given an overview of their responsibilities to uphold the BGIS Code of Ethics; our zero-tolerance approach to Bribery and Corruption; our Risk and Safety management policy requirements; and our commitments to Sustainability and the Environment and Supplier Diversity. In 2020, BGIS was proud to release its Sustainable Procurement Policy. The policy is supported by an extended set of purchasing guidelines and checklists that further articulate our approach to Sustainable Procurement in accordance with the ISO 20400 pillars. Key elements of our operating guidance with respect to Sustainable Procurement include business as usual processes that provide continual assessment of:</p> <ul style="list-style-type: none"> <li>• Organisational Governance</li> <li>• Human Rights</li> <li>• Labour Practices</li> <li>• Environment</li> <li>• Fair Operating Practices</li> <li>• Consumer Issues; and</li> <li>• Community.</li> </ul> <p>Tier 2 Subcontracting Guidelines: In 2019, BGIS Procurement released its Tier 2 Subcontracting Guidelines. Alongside this release, a complete audit of the Facilities Management supply chain was completed, designed specifically to provide greater transparency into the BGIS supply chain and any downstream subcontracting practices.</p>



# OUR ACTIONS

<b>Vendor Code of Conduct</b>	<p>As a business that delivers services to all of our customers through a network of trusted Vendor partners it is essential that we always behave with unquestioned integrity consistent with our core values. To help our vendors and their employees, agents and sub vendors (collectively referred to as “Vendors”) understand these expectations we outline our commitment and expectations in the Vendor Code of Conduct which is formally acknowledged by all BGIS suppliers. The Code includes ensuring that the human rights of workers is upheld and expressly prohibits forced, bonded, indentured or involuntary labour and enforces compliance with applicable wage laws.</p>
<b>Subcontracts</b>	<p>BGIS has strengthened compliance with laws controls when engaging third parties, with provisions for compliance with the Modern Slavery Act 2018 now part of our standard subcontracting agreements. These provisions also promote BGIS’ rights to audit and verify compliance.</p>
<b>Whistleblower Policy</b>	<p>BGIS are committed to fostering a culture in which team members feel supported to provide feedback, especially if they have concerns about ethical issues in the workplace. Our Integrity 24/7 reporting platform allows staff and suppliers to easily and anonymously communicate any misconduct, or gain clarity on something that may be cause for concern – no matter how big or small. To manage the reporting system, we partner with NAVEX Global, an ethics and compliance company that has gone to great lengths to ensure reports entered in the system are completely confidential. The BGIS Whistleblower Policy aligns with legislative requirements and contains workflow demonstrating how all Integrity 24/7 matters are managed.</p>
<b>Modern Slavery framework, Supplier Due Diligence</b>	<p>BGIS undertook a comprehensive review of its 2020 active supply chain of 2700 vendors in alignment with our Modern Slavery framework objectives. This included:</p> <ul style="list-style-type: none"> <li>• 3rd party due diligence assessment of the entire supply chain</li> <li>• Extended supplier engagement through Modern Slavery questionnaire assessment for medium risk vendors</li> <li>• Formal supplier auditing for high risk vendors</li> </ul>
<b>Anti-Bribery and Corruption (ABC)</b>	<p>BGIS utilises Dun &amp; Bradstreet independent screening of all suppliers providing goods or services to BGIS as part of its anti-bribery and corruption (ABC) due diligence. These reviews are undertaken prior to any new supplier being on-boarded to BGIS procure-to-pay platforms. The Dunn &amp; Bradstreet screening program is conducted in 2 phases as follows:</p> <p><b>New Vendors:</b> ‘Level 2 – Intermediate’. These screenings include assessment of: Sanctions / Watch lists / Politically Exposed Persons and Adverse Media relating to: Entity name, Legal names, Principal names, Related Parties and Global Parent. An adverse finding or ‘red flag’ surfaced during this process may result in a vendor being rejected by BGIS or a formal review and acceptance process completed with endorsements obtained by BGIS Managing Director prior to accepting any risk(s) identified.</p> <p><b>Annual Review:</b> All BGIS vendors are annually re-screened against the Dunn &amp; Bradstreet databases to ensure that their company standing has not been compromised subsequent to on-boarding with BGIS. These annual screenings are a ‘Level 1’ review and include assessment of: Sanctions / Watch lists and Politically Exposed Persons relating to the entity name. Escalated reviews are performed on an ad-hoc basis where further information is required by BGIS. These reviews include expanded screening of Open Source Litigation and Credit reporting material.</p>
<b>Supplier Prequalification</b>	<p>All suppliers providing on-site services to BGIS and its clients are required to subscribe to the Avetta contractor management platform. This platform prequalifies suppliers against BGIS minimum company requirements and includes specific disclosures regarding compliance with the Modern Slavery Act, including:</p> <ul style="list-style-type: none"> <li>• All suppliers must acknowledge that they have read, understood and adhere to the BGIS Supplier Code of Conduct which makes specific reference to the application of the Modern Slavery Act;</li> <li>• All suppliers must register and induct their staff via the platform providing BGIS with direct visibility of all staff the supplier intends to utilise in the provision of services to BGIS.</li> </ul>

# OUR ACTIONS

<p><b>Modern Slavery questionnaire</b></p>	<p>In 2020, the Avetta prequalification was expanded to include specific review material to assess risk and vulnerability of modern slavery in the BGIS supply chain. For off-site suppliers, this material was distributed manually for completion and return. Supplier completions were monitored by the BGIS procurement team for 160 suppliers deemed to be Tier 2 (medium residual risk) following our supplier risk assessment process [above]. Any exceptions resulted in a supplier escalated to Tier 1 status with auditing activities then conducted.</p> <p>The questionnaire is designed to identify risk, vulnerability and compliance in the BGIS supply chain by assessing:</p> <ul style="list-style-type: none"> <li>• Annual turnover, company location</li> <li>• Company statement requirements on Modern Slavery</li> <li>• Controls to prevent bonded labour</li> <li>• Supply chain transparency</li> <li>• Country of origin</li> <li>• Audit programs</li> <li>• Policy statements</li> <li>• Training programs</li> <li>• Risk Assessments</li> <li>• Controls reviews</li> </ul>						
<p><b>Supplier Auditing</b></p>	<p>BGIS Procurement undertook formal auditing of suppliers with a residual high risk 'Tier 1' rating as follows:</p> <p><b>Service Suppliers:</b> The majority of BGIS supplier relationships are within the facilities management services industry. Auditing in this field maintained a focus on labour practices, including:</p> <ul style="list-style-type: none"> <li>• Demonstration to BGIS that all staff employed in the provision of services are directly employed by the service provider and hold appropriate visa / permit rights where applicable. The evidence is to include, rostering, timetables and payroll material;</li> <li>• Demonstration to BGIS that all staff employed have been paid their correct entitlements, including, but not limited to:             <ul style="list-style-type: none"> <li>- The payment of award wages, including demonstration of correct overtime and penalty rate payments;</li> <li>- That all leave entitlements and contributions have been met by the service provider, including evidence of annual and sick leave, evidence of long service leave contributions made by the service provider, and demonstration that all superannuation entitlements have been met.</li> </ul> </li> </ul> <p><b>Goods Suppliers:</b> Tier 1 suppliers providing goods or materials to BGIS are primarily associated with industrial and construction supplies. Auditing in this field focuses on supply chain transparency, including:</p> <ul style="list-style-type: none"> <li>• Demonstration to BGIS that the provision of goods and/or materials have been ethically sourced, including an understanding of:             <ul style="list-style-type: none"> <li>- Country of origin;</li> <li>- Labour practices associated with the provision of the good or material;</li> <li>- Transparency of supply chain depth / tiering. Eg. Source of raw material and components; and</li> <li>- Audit and assessment activities conducted by the supplier on its 3rd party supply partners.</li> </ul> </li> </ul> <p>A total of 24 audits were completed with Tier 1 (high residual risk) vendors active within 2020, with no materially adverse findings.</p> <div data-bbox="443 1765 1161 2145" style="border: 1px solid #ccc; padding: 10px; margin-top: 20px;"> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center; color: red; font-weight: bold;">TIER 1 HIGH RESIDUAL RISK</td> <td>                     Supplier Auditing                      Services: Labour focus                      Goods: Supply chain review                 </td> </tr> <tr> <td style="text-align: center; color: yellow; font-weight: bold;">TIER 2 MEDIUM RESIDUAL RISK</td> <td>                     Services: Avetta Modern Slavery Review                      Goods: Disclosures/statements                      Escalate exceptions to Tier 1                 </td> </tr> <tr> <td style="text-align: center; color: green; font-weight: bold;">TIER 3 LOW RESIDUAL RISK</td> <td>                     Services: Avetta Prequalification                      All vendors: Dun &amp; Bradstreet/ABC Due Diligence                      Escalate exceptions to Tier 2                 </td> </tr> </table> </div>	TIER 1 HIGH RESIDUAL RISK	Supplier Auditing Services: Labour focus Goods: Supply chain review	TIER 2 MEDIUM RESIDUAL RISK	Services: Avetta Modern Slavery Review Goods: Disclosures/statements Escalate exceptions to Tier 1	TIER 3 LOW RESIDUAL RISK	Services: Avetta Prequalification All vendors: Dun & Bradstreet/ABC Due Diligence Escalate exceptions to Tier 2
TIER 1 HIGH RESIDUAL RISK	Supplier Auditing Services: Labour focus Goods: Supply chain review						
TIER 2 MEDIUM RESIDUAL RISK	Services: Avetta Modern Slavery Review Goods: Disclosures/statements Escalate exceptions to Tier 1						
TIER 3 LOW RESIDUAL RISK	Services: Avetta Prequalification All vendors: Dun & Bradstreet/ABC Due Diligence Escalate exceptions to Tier 2						



## EFFECTIVENESS OF ACTIONS

The application of our Modern Slavery framework is underpinned by a robust governance environment that challenges BGIS to continuously assess risk and improve supply chain transparency.

These efforts have resulted in a program of extensive supplier engagements that seek to improve the capability of our supply partners in order to demonstrate they understand and are taking actions to mitigate modern slavery vulnerability - not only in their direct service provision to BGIS, but also within their own supply chains.

Improving the capability of our supply partners is a key objective of the BGIS approach to Sustainable Procurement. Whilst self assessment can produce variability of response, the ongoing supplier engagement, through clarification and refinement, is both important in raising awareness of modern slavery vulnerability and reinforces BGIS' commitments to providing the highest levels of quality and transparency to our clients. Similarly, the audit program undertaken of high residual risk suppliers, whilst not surfacing any material non-compliance in our supply chain, has identified areas of potential improvement in both the BGIS framework and the systems of control our supply partners use in their operations to provide transparency to BGIS. These learnings are discussed further within 'Next Steps' below.

# CONSULTATION

The BGIS Modern Slavery framework was established by key members of the senior leadership team from our Procurement, Legal, People & Culture and Operating divisions. Progress of the supplier engagements is regularly communicated to the executive leadership team accountable for all BGIS entities. BGIS also provides our clients with information regarding our approach to mitigating modern slavery vulnerability in our operations and supply chains. Further staff communication and training programs are targeted for completion during 2021.

On 1 October 2020, BGIS wholly acquired HFM Asset Management Pty Ltd (HFM). BGIS has commenced consultation with HFM to apply the BGIS Modern Slavery framework governance to the HFM supply chain.



## NEXT STEPS

BGIS has made sound progress in the identification of modern slavery risks and efforts to mitigate those risks in our operating practices through the application of our Modern Slavery framework. Our priorities for 2021 seek to further embed these practices by:

- improving the support and guidance we provide to suppliers during our assessment programs to leverage the learnings gained within the 2020 audit program
- expanding our training programs to increase awareness and capability for staff undertaking 3rd party purchasing activities
- regularly publishing and reporting outputs of our supplier auditing programs to all areas of our operations to raise ongoing awareness of modern slavery risk
- completing consultation with our HFM entity and further entities who have joined the group in 2021, after the close of the reporting period applicable to this statement.

BGIS understands that the efforts to identify and mitigate modern slavery risks in our operations and our supply chains is ongoing. We will seek to continuously refine and improve our approach in order that we effectively and transparently manage modern slavery risks for ourselves and our clients.



**BGIS** 



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