

**MODERN  
SLAVERY  
IS CLOSER  
THAN YOU THINK**



# Modern Slavery Policy

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## Definitions

Company: For the purpose of this policy the Company refers to The Maxima Cleaning Group

Modern Slavery Act 2018 (Cth) Commonwealth legislation (the Act) enacted by the Parliament of Australia on 29 November 2018

Modern slavery: For this policy as defined in the background information (above)

Suppliers: Organisation or contractor providing goods or services, including their subcontractors, and other related entities.

Supply chains: Sourced products and services (including labour) that contribute to The Maxima Cleaning Group business services and extends beyond direct suppliers.

## Review Procedure

The Managing Directors will review the policy as required. The review schedule is directed in response to organisational and/or legislative changes and requirements. The review will be undertaken in consultation with workers, company representatives and other relevant parties. All relevant persons will be made aware of changes made as a result of the review.

This policy will be reviewed if:

- there are changes in the workplace that may affect the policy;
- the policy is not effective;
- there are legislative changes that affect the policy;
- there is a breach of this policy.

This policy is reviewed at least annually.

## Background

Modern slavery is a terrible practise that deprives a person's liberty and dignity for another person's gain. The term describes situations where coercion, threats or deception is used to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:

- human trafficking;
- slavery;
- servitude;
- forced labour;
- debt bondage;
- forced marriage; and
- child labour.

It is estimated that up to 40 million people are trapped in modern slavery worldwide, including many in developed countries. *Approximately* 25 million of these people are impacted by forced labour. Women and girls are over-represented, comprising about 70 per cent of modern slavery victims, with 25 per cent of all victims being children.

Nearly two-thirds of forced labour victims can be found in the Asia-Pacific region. This makes Australian businesses highly susceptible to the risk of being involved in this wrongdoing through there operations and supply chains

## Modern Slavery Policy

### ❖ Purpose

To ensure modern slavery practises are not taking place in any of our supply chains or in any part of our business.

### ❖ Policy Application

This policy applies to all persons working for, or providing services to Maxima Cleaning Group.

We expect that all persons and organisations seeking a relationship with us are familiar with this policy and to act in a way consistent with its values.

### ❖ Policy

Maxima Cleaning Group respects human rights and is committed to limiting the risk of modern slavery within our supply chains and operations. The Company does not condone or use child or forced labour in any of our operations or premises and will work to ensure these practices are not present in our operations or supply chain. We expect that all organisations we engage with to do the same.

We declare that our workforce is voluntarily and entitled to leave the work whenever they desire. Workers are not required to post a deposit or bond, and salaries are not withheld for any reason.

The Company will follow all laws and regulations regarding employment practices and if made aware of modern slavery practices in its own business, or within its supply chain, will resolve the issue in line with the values expressed in this policy. It is expected that suppliers have similar values to the Company concerning modern slavery.

A handwritten signature in black ink, appearing to read 'Julie Meagher', is written over a horizontal line.

**Date:01/04/2024**

**Signature:**

## Training

All staff will undertake an awareness programme on modern slavery, which covers:

- the various forms of modern slavery and how people can be held and exploited;
- the scope of the issue and how it affects our organization;
- how personnel can identify the signs of modern slavery practices;
- responsibilities of workers should they suspect modern slavery.

## Risk Assessment

Maxima Cleaning Group commits to undertaking a detailed risk assessment to identify which parts of our operations and supply chains are most at risk from modern slavery.

The focus will be placed on monitoring high-risk suppliers and mitigating associated risks.

Responsibility for assessing and addressing modern slavery risks is assigned to Julie Meagher who will brief all employees appropriately.

Julie Meagher will engage directly with credible experts, workers and other potentially affected groups in our operations and supply chains, to assess risks.

## Reporting Responsibilities

All Maxima Cleaning Group workers are responsible for the detection, reporting and prevention of modern slavery in our own business operations, and supply chain.

Workers are encouraged to raise any concerns regarding instances of possible modern slavery. If it is suspected or believed that a breach of this policy has occurred contact the Site Supervisor or General Manager as soon as possible.

If unsure about whether a particular act or conditions represents any of the identified forms of modern slavery, raise concerns with your manager in the first instance or Site Supervisor.

Maxima Cleaning Group has a no-blame policy regarding modern slavery reporting and will support all persons raising genuine concerns in good faith. No workers will suffer detrimental treatment (e.g. dismissal or disciplinary action) as a result of reporting their concerns in good faith.

## Supply Chain – Supplier Conduct

Maxima Cleaning Group will undertake due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. Including:

- assessing the risk profile of countries based on the [Global Slavery Index](#);
- identifying the presence of vulnerable demographic groups;
- assessing risks in the provision of supplier services;
- conducting an audit of suppliers, their health and safety standards, labour relations and worker contracts.

Maxima Cleaning Group expects all new and existing Suppliers to comply with the principles set out in this policy. We expect Suppliers to operate in compliance with the laws and regulations of their applicable jurisdiction or the supply of goods and services to our Company.

Suppliers must ensure that there are no modern slavery practices in their supply chains and operations. If the Company or Suppliers identify any incidence of modern slavery in their supply chains or operations, they must take all practical steps to address that occurrence or risk. Suppliers must notify Maxima Cleaning Group as soon as practicable of any occurrence of modern slavery in their supply chain and notify relevant authorities where appropriate.

As a condition of working with Maxima Cleaning Group, we require all suppliers to confirm:

- their workforce does not contain forced or compulsory labour practices;
- their workforce is voluntarily and is entitled to leave the work whenever they desire;
- provision of an employment contract that contains reasonable conditions and notice periods;
- workers are not required to post a deposit/bond, and salaries are not withheld for any reasons;
- workers to NOT required to surrender their passports or work permits as a condition of employment;
- underage children are not used in undertaking work.

## **Non-compliance with this Policy**

Maxima Cleaning Group strives to maintain the highest standards of conduct and ethical behaviour when operating abroad and managing our supply chain. All breaches of this modern slavery policy will be taken seriously and dealt with on a case by case basis.

### Workers

Breaches of this Policy by an worker may lead to disciplinary action. Serious breaches will be regarded as gross misconduct and may lead to immediate dismissal.

### Suppliers

Identification of non-compliance by suppliers will be assessed on a case by case basis with the Company working to ensure the Supplier remains compliant with this policy. Where serious breaches are identified, and the Supplier cannot remain compliant with this policy disengagement from the Supplier will occur as soon as practicable.