

Ezko Property Services Pty Ltd

Website: www.ezko.com.au

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Modern Slavery Act 2018



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Chief Executive Officer



Guiding Principles

Slavery remains largely hidden from view in a complex web of global supply chains. Due to our reliance on imported goods, Ezko buy, use and rely on products and services from high-risk sectors. The supply chain by its own name, connects each link to every other link and poses complex challenges to organisations such as Ezko.

“Our suppliers and their products and practices represent our brand and Ezko in turn represent our client’s brands.”





Our Objective

To prevent, mitigate and remediate modern slavery through our operations and supply chains.

Aims

- To Demonstrate our commitment to tackle modern slavery.
- Determine proactive measures that can be taken in our own operations to reduce the risks.
- Determine proactive measures that can be taken within our supply chains to reduce the risk.
- Support engagement with employees, employee representatives, suppliers and clients to protect workers and prevent exploitation.

Modern Slavery Act (2018)

The [Modern Slavery Act 2018](#) is Australia's approach to address modern slavery. While Ezko is not required under the Act to report, our clients and our people expect that Ezko take steps so that our business does not cause or contribute to instances of modern slavery.

What is Reasonable?

It is important for us to remember, that we don't expected to solve all the problems we find overnight. It's widely acknowledged that eradicating modern slavery from supply chains will be an ongoing process over years. By adopting a philosophy of continual improvement refining our commitments over time while leveraging our sphere of influence will enable Ezko to operate with good practice and a clear conscience for our employees and our stakeholders.

“
If you haven't identified slavery
in your supply chain,
it is likely that you are not looking
in the right places
”

Assessing the Risks

Assessing the issues is the first step to understand risks and then design controls. We must be able to recognise the practices which maybe slavery-like conditions and install processes to identify where it is most likely to occur in either our operations or supply chains.

1. Business models structured around high-risk practices

Outsourcing labour through third-party arrangements, introduces complexity into the supply chain. This is an attractive business model as it reduces costs and outsources administrative tasks. Ezko utilise sub-contractors for specialist services such as abseil window cleaning etc.

Risk – Outsourcing significantly reduces visibility over a sub-contractor’s recruitment and employment practices.



2. High risk product and service practices

- a. Raw materials
 - i. While raw materials are not procured directly from our suppliers, our visibility of the manufacturing practices are reduced.

Risk - Raw materials used to make products that we procure may be from high-risk geographies.

b. Services procurement

Engaging services such as floor strip n seal services, high cleaning, abseil glass cleaning, machinery servicing and other specialised services reduces our risks by engaging specialists.

Risk – Managers might engage services without verifying contractors adherence to the Fairwork and Modern Slavery requirements.

- ii. Exposing exploitation of cleaners- In 2011, the Fair Work Ombudsman (FWO) audited 315 cleaning companies and found 37% non-compliant. In the commercial property cleaning industry there were 43 breaches of workplace laws, fraudulent contracting arrangements, wage payments lower than the minimum requirement, poor job security, work intensity leading to low service standards, OHS safety issues and poor ethical treatment of workers.

Risk – Our company brand, the client’s brand and their stakeholder’s brands are exposed to significant operational and reputational risks.

c. Branded and un-branded goods not for resale

- iii. Avoiding modern slavery, beyond our first-tier suppliers, is a challenge. In 2012 Qantas faced a public backlash after it was found that in-flight headphones were made at a Chinese prison

Risk – Ezko use chemicals, cloths, mops, buckets, brooms, vacuum cleaners and equipment that could fall into this category. We purchase consumables such as paper towel, soap, dispensers, toilet paper for and on behalf of clients.



3. Vulnerable populations & geographies

Precuring products (through suppliers) from conflict-affected zones, or where laws are weak or governments do not protect human rights, exponentially increases our risks.

a) Migrant workers

- i. Ezko employ many workers who are in Australia studying under a 'Student Visa'.

Risk – the exploitation of vulnerable workers including foreign students and migrants either through our own operations or our supply chain. We need to employ higher controls such as manager training and a systematic payroll system that manages the elevated risk of modern slavery.

b) Base-skilled workers

Basic skilled workers, (migrant, low socio-economic, or culturally diverse backgrounds), are vulnerable to underpayment of wages, entitlements, and excessive working hours.

Risk – many of Ezko's employees sit within this category and we need higher level controls such as a systematic payroll system, maximum direct employment and compliant verified contractors and suppliers to ensure Ezko, our clients and their stakeholders are protected.

Actions

1. Assessment - Categorise our spend.
2. Draw attention to modern slavery and its risks to key suppliers.
3. Develop a written policy for suppliers and partners outlining expectations.
4. Build Modern Slavery requirements into Purchase Order Terms & Conditions.
5. Make discriminate choices within our supply chain to only work with those that share our desire to adhere to Modern Slavery Act principles.
6. Initiate a 'help line' or Whistle Blower mechanism for employees, suppliers and clients to anonymously raise concerns.



Whistle Blower

We believe in transparency and open communication and expect clients, employees and suppliers to raise concerns in relation to Modern Slavery and the practices of Ezko Property Services. We expect our supply partners have and promote their own Whistle blower policy to their employees and supply chain. Ezko Whistleblower: consultation@ezko.com.au.

All matters raised will be treated confidentially and on a non-retaliatory basis.