

# THE CLEANERS ROOM

## Modern Slavery Policy

### Contents

<b>Introduction .....</b>	<b>2</b>
Review Procedure.....	2
Standards and Guidelines.....	2
Terminology.....	2
Document Control .....	3
<b>Modern Slavery Policy .....</b>	<b>4</b>
<b>HR Incident and Investigation Report Form.....</b>	<b>7</b>

**Disclaimer:** This document contains material to assist in addressing Occupational Health and Safety management obligations. Although every effort has been made to ensure the accuracy of this information at the time of publication, it is provided as guidance only. It does not provide legal advice on meeting your obligations.

## Introduction



Slavery has been abolished for over a century in most parts of the world, but unfortunately, it still exists in various forms today. This is where modern slavery policy comes in; it is a crucial tool in combating the exploitative practices that are still taking place worldwide. This policy seeks to protect vulnerable groups, such as women, children, and migrant workers, from being forced into situations of forced labor, debt bondage, and human trafficking.

### 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 because 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.

### Standards and Guidelines

Fair Work Act 2009

### Terminology

#### Definitions

We, us, our, our company or the organisation" means The Cleaners Room (Big Stage Ent Pty Ltd).

Worker: is a person who carries out work in any capacity for an Organisation, including work as:

- |  |  |
|--|--|
| a. An employee, or                       | f. A person of a prescribed class, or            |
| b. Outworker, or                         | g. A contractor or subcontractor, or             |
| c. An apprentice or trainee, or          | h. A worker of a contractor or subcontractor, or |
| d. A student gaining work experience, or | i. A worker of a labour-hire company.            |
| e. A volunteer, or                       |  |

Workplace – means a place where work is carried out for a business or undertaking and includes any place where a worker goes or is likely to be while at work. A workplace includes:

- a. A vehicle, vessel, aircraft, or other mobile structure; and
- b. Any waters and installations on land, on the bed of any waters or floating on any waters.

# Document Control

## Distribution Record Register

Copy	Issued to	Controlled Copy		Authorised by	Recipient Signature	Issue Date
		Y	N			
1		<input type="checkbox"/>	<input type="checkbox"/>			
2		<input type="checkbox"/>	<input type="checkbox"/>			
3		<input type="checkbox"/>	<input type="checkbox"/>			
4		<input type="checkbox"/>	<input type="checkbox"/>			
5		<input type="checkbox"/>	<input type="checkbox"/>			

## Amendment Record Register

Issue #: 1

Issue Date:

Rev. #	Date	Details		Description of Changes	Approved By
		Section #	Para. #		
1					
2					
3					
4					
5					

# Modern Slavery Policy

## BACKGROUND

Modern slavery is a terrible practice 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; or
- slavery; or
- servitude; or
- forced labour; or
- debt bondage; or
- forced marriage; or 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 their operations and supply chains.

## POLICY

The Cleaners Room (Big Stage Ent Pty Ltd) respects human rights and is committed to limiting the risk of modern slavery within our supply chains and operations. We do not condone or use child or forced labour in any of our operations or premises. It will work to ensure these practices are not present in our operations or supply chain. We expect that all organisations we engage with 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.

We 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 us concerning modern slavery.

## 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; and
- the scope of the issue and how it affects our organisation; and
- how personnel can identify the signs of modern slavery practices; and
- responsibilities of workers should they suspect modern slavery.

## RISK ASSESSMENT

We commit 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 Management who will brief the relevant parties appropriately.

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

## REPORTING RESPONSIBILITIES

All workers are responsible for detecting, reporting, and preventing modern slavery in our own business operations and supply chain.

Workers are encouraged to raise any concerns regarding instances of possible modern slavery. If suspected or believed that a breach of this policy has occurred, please contact Management 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.

We have 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) due to reporting their concerns in good faith.

## SUPPLY CHAIN – SUPPLIER CONDUCT

We will undertake due diligence on all new suppliers during onboarding and on existing suppliers at regular intervals. Including:

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

The Cleaners Room (Big Stage Ent Pty Ltd) 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 Cleaners Room (Big Stage Ent Pty Ltd) 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 The Cleaners Room (Big Stage Ent Pty Ltd) 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 us, we require all suppliers to confirm:

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

## NON-COMPLIANCE WITH THIS POLICY

We strive 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 a 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 us 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.

## REPORTING

- All workers are responsible for the prevention, detection and reporting of modern slavery activity.
- Report modern slavery to a supervisor and/or complete the *HR Incident and Investigation Report Form*.
- If you have reason to believe or suspect that an instance of modern slavery has occurred or will occur in the future, you must notify Management as soon as possible.
- We will ensure to take appropriate action in response to any reported incidents of modern slavery.

Signature:

Date:01.01.2023

A handwritten signature in black ink, appearing to read 'Aydan Fowkes', written over a light grey rectangular background.

Aydan Fowkes

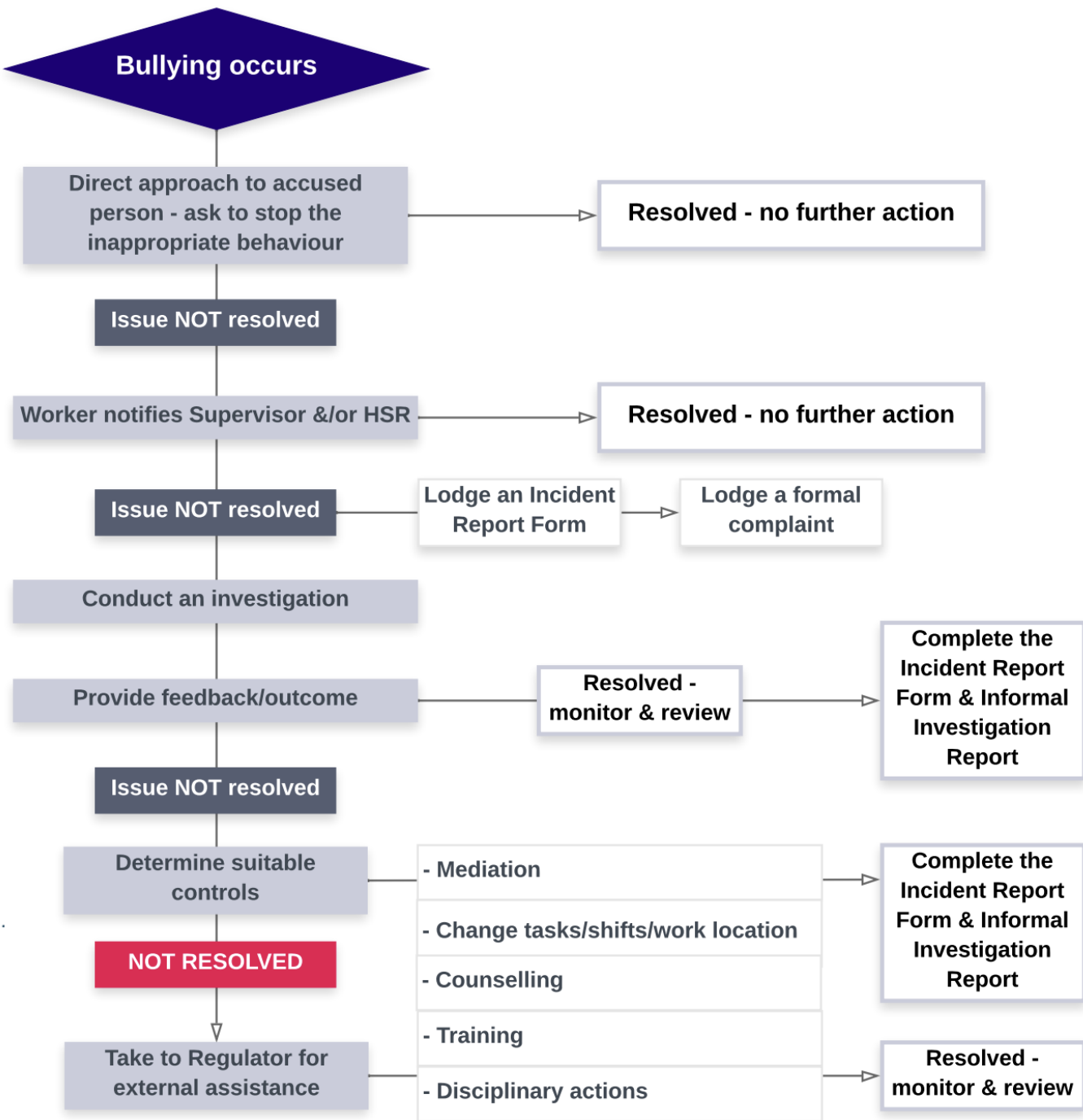
Director

---

# HR Incident and Investigation Report Form

Administrative use only. Date Submitted:

## INCIDENT REPORT AND INVESTIGATION FLOWCHART.



**INFORMAL COMPLAINT**

1. The complainant may wish to communicate directly with the person with whom they have a concern and ask that they refrain from further conduct of that nature.
2. If direct communication is not possible or does not resolve the complainants' concerns, they should then discuss the matter with their Management who will explain potential strategies for dealing with the conduct complained of.
3. The complainant, in consultation with Management, will decide on a course of action to attempt to resolve the matter.
4. If deemed appropriate, we may be able to assist in the informal resolution process by the appointment of a mediator agreed to by the parties involved, who may be able to help the parties resolve the matter.
5. After achieving a satisfactory resolution, the issue will be monitored by Management to ensure there are no re-occurrences or further concerns.
6. Records kept during the resolution process.

**FORMAL COMPLAINT**

1. Where a complainant's endeavours to resolve a complaint informally have failed, he or she may choose to make a formal complaint.
2. The particulars of the complaint must be submitted in writing to management. This would include a completed Incident/Injury Report Form and any supporting statements or documents.
3. Management will investigate the complaint in consultation with the relevant persons. The investigation will follow and apply the principles of Natural Justice.
4. After completing the investigation, Management will make a finding as to whether bullying has occurred, or whether it is likely to have happened.
5. An appropriate course of action will then be decided and implemented, in consultation with all relevant persons.
6. If required, assistance to achieve an acceptable resolution will be initiated with an appropriate external authority.

PERSONS INVOLVED		
Name of person reporting:	Are you a worker? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Phone:	Mobile ph.:	
Email:		
Managers' Name:	Managers' Phone.	
Managers' Email:		
Name of the complainant (if different than person reporting):		
Complainants' address (if not a worker):		
Are you a worker? <input type="checkbox"/> Yes <input type="checkbox"/> No	Email:	
The Complainants' ph.:	Mobile ph.	
Complainants' Managers' Name (if a worker):		
Managers' ph.	Managers' Email:	
Was medical treatment required? <input type="checkbox"/> No <input type="checkbox"/> First Aid <input type="checkbox"/> Nurse <input type="checkbox"/> Doctor <input type="checkbox"/> Hospital		
Description of behaviour/incident:		
Location:	Time:	Date:
Name of the accused person of the offence (if known):		
Are you a worker? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown		



**Type of incident:**

- Verbal abuse  Threatening behaviour  Armed assault  Physical assault  Property damage
- Sexual harassment  Discrimination/Equal opportunity (specify):

Describe incident: (provide as much detail as possible, including events leading up to incident ) The format who, what, where, when and why can help describe the incident.

Describe immediate actions taken (e.g. security/police/manager/co-worker called)

Was medical attention/first aid required?  Yes  No (Describe injuries and first aid provided):

**WITNESSES: List names and contact details**

Witness 1- Name:		Witness role <input type="checkbox"/> Worker <input type="checkbox"/> Customer <input type="checkbox"/> Other?	
Address:			
Contact No:	Email:		
Witness 2- Name:		Witness role <input type="checkbox"/> Worker <input type="checkbox"/> Customer <input type="checkbox"/> Other?	
Address:			
Contact No:	Email:		
Witness 3- Name:		Witness role <input type="checkbox"/> Worker <input type="checkbox"/> Customer <input type="checkbox"/> Other?	
Address:			
Contact No:	Email:		
Witness 4- Name:		Witness role <input type="checkbox"/> Worker <input type="checkbox"/> Customer <input type="checkbox"/> Other?	
Address:			
Contact No:	Email:		

**FOLLOW UP**

Has a police report been submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No	Has an investigation been initiated? <input type="checkbox"/> Yes <input type="checkbox"/> No
Reporting person name:	Sign:
Supervisor name:	Sign: