

Modern Slavery and Human Rights Policy

1. Purpose

- 1.1 The purpose of this policy is to affirm the approach of ServiceFM to mitigating the risks of all forms of Modern Slavery and ensure adherence to guiding principles relating to Human Rights.

2. Scope

- 2.1 This policy applies to all ServiceFM employees, workplaces, and work activities.
- 2.2 This policy will be used to underpin and inform any statement on slavery and human trafficking that the Company may be required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

3. Policy Statement

- 3.1 ServiceFM is committed to conducting its business operations in a way that respects the rights and dignity of people, and avoids complicity in any human rights abuses, while complying with legal and regulatory requirements which incorporate the protection of human rights. These include, but are not limited to:
- Employment laws, covering areas such as discrimination, harassment – including sexual harassment, workplace bullying, victimisation, domestic violence and workplace health and safety; and
 - Modern Slavery areas including client, suppliers, and supply chain related requirements such as responsible services, supply, and accessibility

4. Principles

Our position on modern slavery

- 4.1 ServiceFM rejects any form of slavery, forced or compulsory labour, including child labour, and are committed to implemented and enforcing effective systems and controls to ensure these practices do not take place in our own operations or that of our supply chains.
- 4.2 Modern slavery can take many forms; it is a complex and multi-faceted problem and includes:
- Slavery: where ownership is exercised over an individual
 - Servitude: involves the obligation to provide service imposed by coercion
 - Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
 - Human trafficking: involves arranging or facilitating the travel of another view to exploiting them

- Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.
- 4.3 ServiceFM shall aim to identify and manage any risks identified relating to modern slavery across our own company and through our supply chain.

Respecting human rights

- 4.4 ServiceFM will respect the human rights of our employees, workers, clients, communities, and those of our suppliers and business relationships.
- 4.5 Employee related policies and procedures will reflect internationally recognised human rights, tailored appropriately to meet local legislation, regulations and working practices, including legislative standards and employee and union negotiated conditions, where applicable.
- 4.6 We are dedicated to, and promote adherence to, internationally recognised human rights standards and guiding principles, including:
- International Bill of Human Rights
 - International Labour Organisation's eight fundamental Conventions
 - United Nations Guiding Principles on Business and Human Rights

Our supply chain

- 4.7 ServiceFM recognises and acknowledges the potential for modern slavery to occur within our supply chains, regardless of location. ServiceFM expects our suppliers to manage their business and supply chain in a manner that respects human rights.
- 4.8 ServiceFM has a relatively simple supply chain that includes the purchase of products and services needed to the day-to-day operations of the company, through to the purchase specialised services.
- 4.9 ServiceFM shall reinforce this expectation with contractual obligations. We expect all existing and new suppliers to comply with the Supplier Code of Conduct.

Risk management and due diligence

- 4.10 The risk management framework and approach of ServiceFM is to be used when assessing the potential modern slavery or human rights risks in our operations and supply chains with emphasis on high-risk geographical locations and company transactions.
- 4.11 Issues that are identified or arise are to be reported and to escalated as appropriate.
- 4.12 Relevant monitoring, oversight and review processes will be undertaken to assess the effectiveness of ServiceFM human right commitments and modern slavery requirements.
- 4.13 Any external and public reporting requirements will be completed to meet all relevant legal, regulatory, and voluntary commitments relating to human rights and modern slavery

Our ongoing activities

- 4.14 ServiceFM is dedicated to continuous improvement and acknowledge that we are ensuring that adequate policies, processes, systems, and controls are in place to identify and mitigate modern slavery and human rights risk.

- 4.15 ServiceFM will embed employee training and awareness of modern slavery and human rights issues to help identify and report such issues when identified.
- 4.16 We acknowledge that these matters continue to evolve, and we endeavour to adapt and remain vigilant and versatile.

5. Feedback

Feedback about this document can be emailed to compliance@servicefm.com.au

6. Endorsement

- 6.1 This policy is authorised, supported, and approved by:



James Pollock – Chief Executive Officer

Date: 01/04/2021