

Modern Slavery Statement

This voluntary statement, pursuant to the Australian Commonwealth Modern Slavery Act 2018 outlines the risks of modern slavery in the Bayton Group operations and supply chains and actions adopted to address those risks. The Bayton Group refers to all entities highlighted in Appendix 1.

The Bayton Group have been developing and improving cleaning solutions to help their clients succeed since 1965. Wholly Australian owned and operated, the Bayton Group provide services nationally with office locations in NSW, Queensland, and Victoria. The portfolio of clients includes over 550 sites Australia wide, covering a variety of industries including Health and Age Care, Retail, Commercial, Hospitality and Industrial. Bayton have approximately 150 directly employed employees and utilise the services of labour hire providers and suppliers to fulfil our service obligations.

From small to large business, multi-story office complexes to age care facilities, Bayton Group offer services which include:

- General Cleaning,
- Public Area Cleaning,
- Tenancy Cleaning,
- Home care services,
- Outbreak management,
- Pressure washing,
- Strip and seal,
- Kitchen deep cleans,
- Carpet steam cleaning,
- Waste management,
- Garden Maintenance
- Street and Car Park Sweeping,
- Testing and Tagging
- Graffiti removal and more.

Our mission is to establish long term partnerships built on solid foundations of superior service, expertise, communication, and continuous improvement.

Bayton is committed to attracting, retaining, and growing a diverse and inclusive workforce. We are proud to be an equal opportunity (EEO) employer. Our core values are excellence, transparency, teamwork, continuous improvement, and fun.

Bayton is committed to maintaining and continually improving our systems and processes to avoid any involuntary involvement in any human rights violations pertaining to our operations, our supply chain, or services. The use of externally produced cleaning products, equipment or services provided by external parties, including but not limited to labour hire providers and/or subcontractors as part of our business operations, poses a risk. In addition, as in any service delivery operations, there is always the risk of bribery and corruption.

In the instance that a suspected breach occurs, employees can report as per the Bayton's Grievance Policy for personal work-related complaints and / or the Whistle-blower Policy for observed or potential misconduct by individuals who are or have been in relation to Bayton. Both policies can be accessed at myBayton and in the Employee Handbook.

Bayton currently have several documents and processes which supports our efforts to ensure *Modern Slavery* does not exist within our supply-chain including:

- Supplier code of conduct via Bayton QEHS Procedures Manual
- Employee Code of Conduct via Bayton Handbook
- Anti-Fraud and Corruption Policy
- Conflict of Interest Policy
- Whistle-blower Policy
- Workplace Discrimination and Harassment Policy
- Equal Employment Opportunity Policy
- Gender Equality Policy
- Grievance Policy
- Corporate Social Responsibility Policy
- Sustainable Procurement Policy
- Information Security Policy
- Bayton Subcontract and Labour Hire Agreement for all Subcontractors/Labour Hire Providers
- Modern Slavery Compliance signed by all suppliers
- Scheduled Supplier Audits conducted by Bayton QEHS Manager
- Annual National Subcontractor Toolbox Talk facilitated by the QEHS Manager
- Annual Employee satisfaction survey
- Annual Financial Audit conducted by external auditor
- Annual external accreditation against ISO Standards ISO 45001:2018 Occupational Health and Safety, ISO 9001:2015 Quality and ISO 14001:2015 Environment
- Supplier Audit conducted by external auditor on demand.

Actions and Progress between 2019-2023

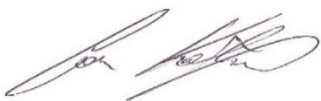
- Reviewed and updated the Bayton policies on discrimination and harassment, grievance and anti-fraud and corruption.
- Created and issued the Bayton policies on Conflict of Interest, Whistle-blower, Corporate Social Responsibility, Sustainable Procurement, and Information Security policies.
- Reviewed and updated the Bayton QEHS Procedures Manual and the Bayton Subcontract Agreement to include supplier code of conduct.
- Introduce Statutory Declarations for Queensland and Victorian labour hire suppliers and subcontractors.
- Renew Statutory Declarations annually for all labour hire suppliers and subcontractors nationally.
- Bi-annual supplier audits in Queensland and Victoria.
- Quarterly supplier audits conducted in NSW
- Annual audit of Bayton employees conducted by Bayton QEHS Manager or external auditor alternatively.

- Supplier and Bayton Employee Audit conducted by ISO Safe Australia.
- Compliance Agreement executed with HSU NSW Branch.
- Financial Audit conducted by an external auditor annually.
- Maintained certification to ISO 9001, 14001 and 45001.
- ISO surveillance and re-certification audit conducted by SAI Global.
- Enhanced Bayton employee induction to include modern slavery awareness.
- Employee toolbox talks held on modern slavery, racism, workplace violence and aggression, Bayton Code of Conduct, R U Ok? Day and Safety.
- Mandatory training for all senior leaders, those in procurement and account managers in modern slavery, sustainability, sustainable procurement, cybersecurity and bribery and corruption.
- Bayton Modern Slavery Compliance form introduced and deemed mandatory for all Bayton Suppliers.
- Updated Bayton Subcontract and Labour Hire Agreement for Subcontractor/Labour Hire Providers including Compliance to Workplace Laws Questionnaire
- Subcontractor Toolbox Talks on Modern Slavery, Service Requirements, Supplier Audit Requirements and Compliance to Workplace Laws.
- Annual National Subcontractor Toolbox Talk facilitated by QEHS Manager done online.
- Enhanced Supplier Audit criteria to include verification of Compliance to Workplace Laws.
- Undergo Annual Sustainability Assessment which includes social compliance via EcoVadis platform.
- Australian Human Rights Commissions e-learning on Anti Racism participated by members of Bayton Senior Management

The effectiveness of the above actions is analysed at different stages throughout the year by the QEHS Manager. A review of the actions and the effectiveness of each is completed at the Bayton Management Review Meeting.

The Bayton Executive Leadership Team lead by CEO Con Katsinas will consult with the Bayton Board of Directors who oversee all Bayton Group entities at the scheduled Bayton Group board meeting.

Signed by:

A handwritten signature in blue ink, appearing to read "Con Katsinas", written over a light blue horizontal line.

Con Katsinas, Bayton Group CEO

Dated: 01/11/2023

Appendix 1

Company	ABN	Company	ABN
Bayton Group Holdings Pty Ltd	42 000 769 880	Bayton Property Services Pty Ltd	58 010 647 006
Bayton Cleaning Co. Pty Ltd	13 000 586 247	Bayton Property Services (VIC) Pty Ltd	87 079 412 114
Bayton Cleaning Employment Co Pty Ltd	79 083 052 644	International Hotel Services Pty Ltd	53 080 511 557

Review History

Revision No.	Details	Revision Date
00	Document creation	19/07/2019
01	Grammatical and 2020 actions updates and additions	23/07/2020
02	2020 actions updates and additions	12/08/2020
03	2021 actions additions	22/09/2021
04	Updates on related documents and additional actions	04/01/2022
05	2022 actions updates and additions	04/10/2022
06	2023 actions updates and additions	10/10/2023
07	Additional 2023 actions and change in Bayton entities in Appendix 1	01/11/2023