



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 (56 years). Wholly Australian owned and operated, the Bayton Group provide services nationally with office locations in NSW, QLD 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 200 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 Procedures Manual
- Employee Code of Conduct via Bayton Employee Handbook
- Fraud and Corruption Policy
- Whistle-blower Policy
- Grievance Policy
- Subcontractor Contract Agreement for all suppliers
- Scheduled Supplier Audits conducted by Bayton QEHS Manager
- Bi-Annually subcontractor toolbox talks
- Annual Employee satisfaction survey
- Annual Financial Audit conducted by external auditor
- Annual external accreditation against ISO Standards AS/NZS 4801:2018 Health and Safety, AS/NZS ISO9001:2015 Quality and AS/NZS ISO 14001:2015 Environment
- Supplier Audit conducted by external auditor on demand.

Actions taken in 2019-2021

- Reviewed and updated the Bayton policies on discrimination and harassment, grievance and fraud and corruption.
- Created and issued the Bayton policies on Conflict of Interest and Whistle-blower.
- Reviewed and updated the Bayton Procedures Manual 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 introduced in Queensland in 2019.
- Supplier audits scheduled each trimester in Victoria in 2021.
- Quarterly supplier audits conducted in NSW
- Internal Audit of all Bayton direct hire employees conducted by Bayton QEHS Officer in 2019 and scheduled in 2021.
- 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.
- ISO surveillance and re-certification audit conducted by SAI Global.
- Subcontractor and employee toolbox talks held on modern slavery.

- Enhanced Bayton employee induction to include modern slavery awareness.
- Mandatory training for all senior leaders, those in procurement and account managers in modern slavery.
- Bayton Modern Slavery Compliance form introduced and deemed mandatory for all Bayton Suppliers.
- Updated Subcontractor Contract Agreements particularly the Compliance to Workplace Laws Questionnaire
- Subcontractor Toolbox Talks on Supplier Audit Requirements and Compliance to Workplace Laws issued in 2021.
- Enhance Supplier Audit criteria to include verification of Compliance to Workplace Laws.

The effectiveness of the above actions will be analysed at different stages throughout the year by the QEHS Manager. A review of the actions and the effectiveness of each will be 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:



Con Katsinas, Bayton Group CEO

Dated: 22/09/2021

Appendix 1

Company	ABN	Company	ABN
Bayton Cleaning Co. Pty Ltd	13 000 586 247	Health Support Services (No. 1) P/L	75 083 052 626
Bayton (No.3) Pty Ltd	85 083 052 671	Health Support Services (No. 2) P/L	79 083 052 644
Bayton (No.4) Pty Ltd	72 056 534 028	Bayton Property Services (VIC) Pty Ltd	87 079 412 114
Bayton (No.10) Pty Ltd	74 056 536 979	Bayton Superannuation Fund	34 249 651 304
Bayton Group Unit Trust	99 697 152 997	International Hotel Services (No.2) Pty Ltd	62 135 036 305
Bayton Group Holdings P/L	42 000 769 880	International Hotel Services Pty Ltd	53 080 511 557
Bayton Property Services P/L	58 010 647 006	International Hotel Services (No.3) Pty Ltd	61 151 515 383
Bayton Property Services (No.2) P/L	56 000 699 025	Broderick Trust	99 420 136 156

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