



# 2023 MODERN SLAVERY STATEMENT



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# REPORTING ENTITIES

This is Access Group Solutions inaugural Modern Slavery Statement has been prepared to meet the mandatory reporting criteria set out under the Australian Modern Slavery Act 2018 for the financial year ended 30 June 2023. It outlines the actions taken by the Access Group Solutions group of companies to mitigate modern slavery in our business operations and supply chains.

This statement has been produced on behalf of Access Group Solutions, for financial year ending June 2023, and includes wholly owned subsidiaries:

30 614 526 288	Access Group Solutions (MGT) Pty Ltd
93 613 334 160	Access Group Solutions (NSW) Pty Ltd
24 613 909 489	Access Group Solutions (MEL) Pty Ltd
17 146 311 319	Access Security Protection Services Pty Ltd
15 164 079 556	Access Group Solutions 1 Pty Ltd
65 622 293 967	Access Group Solutions 2 Pty Ltd
17 622 294 526	Access Group Solutions 3 Pty Ltd
52 622 294 660	Access Group Solutions 5 Pty Ltd
82 617 179 709	Access Engineering Systems (NSW) Pty Ltd
71 620 019 865	Access Group Solutions 6 Pty Ltd
49 620 020 064	Access Group Solutions 7 Pty Ltd
14 164 079 109	Access Group Solutions 8 Pty Ltd
19 636 671 602	Access Group Solutions 9 Pty Ltd
14 636 672 896	Access Group Solutions 10 Pty Ltd



## Acknowledgement of Country

Access Group Solutions acknowledges the traditional owners of this land throughout Australia, and we pay our respects to Elders past, present and emerging.

*All Access Group Solutions' personnel engage in diverse NAIDOC events to enhance their understanding and respect for Australia's original inhabitants.*

# AGS DIRECTOR'S MESSAGE

**At Access Group Solutions (AGS), we firmly believe that 'people are our greatest asset' and the heart of everything we do. That's why we're dedicated to ensuring that our operations are free from any form of exploitation or forced labour.**



Fred Khoury - Founder and Managing Director

The harsh reality of modern slavery affects over 50 million individuals worldwide, with a staggering 26.5% increase since 2016, including a surge in Australia to at least 41,000 affected individuals in 2023.

This report will explore the factors that contribute to modern slavery, focusing on the operational risks within our industries and exposure within the supply chains providing products and services. It is imperative that the emphasis remains on the collaborative effort that will be required for all businesses to work towards the eradication of any violation of human rights.

Our collective responsibility is clear: to identify, educate, confront, and act against any instances of modern slavery. It is crucial to raise awareness of its various forms, such as coercion, threats, or deception, which are used to exploit victims, depriving them of their freedom and subjecting them to severe exploitation. These include human trafficking, slavery, forced labour, debt bondage, forced marriage, and child exploitation.

In the past year, AGS has made significant strides in addressing and minimising the risks associated with modern slavery in our operations. Moving forward, we remain dedicated to continually evaluating, reviewing, and improving our practices. We're committed to playing our role in supporting efforts to eliminate modern slavery within our industry and those that service it.

AGS recognises that collaboration and vigilance are indispensable for making a significant impact on modern slavery, and we express our gratitude for joining us on this journey.

**FRED KHOURY**

Managing Director  
Access Group Solutions

**50**MILLION  
PEOPLE IN MODERN  
SLAVERY

**1** IN **4**  
ARE CHILDREN

**27.6**MILLION  
ARE IN FORCED LABOUR

**41** THOUSAND  
AUSTRALIAN VICTIMS  
1 IN 5 REPORTED

Source: UN Report & Walk Free - Global Slavery Index

# OUR PROGRESS HIGHLIGHTS



As we reflect on the past year, we are proud to share the measures we have taken in combatting modern slavery within our business. Through dedicated efforts, we've undertaken self- assessment questionnaires, reviewed our processes and implemented initiatives aimed at eradicating this injustice.

We are committed to our ongoing journey toward ethical business practices and human rights advocacy.



## AGS PROGRESS

- External auditors reviewed payroll entitlements, workplace conditions ensuring fairness, compliance and transparency.
- We collaborated with independent providers for workshops on Modern Award conditions and conducted Respectful Workplace training to foster inclusivity and mutual respect.
- Introduced an Independent and ASIC compliant external Whistleblower Program to enable our people to confidently speak up about any dishonesty, fraud, unsafe environments, unethical and other inappropriate behaviour or misconduct - anonymously if necessary.
- Actively participating in client-initiated audits; we consistently meet and exceed industry standards. This continuous scrutiny ensures that our practices align with the highest ethical benchmarks.
- Our strict adherence to the Cleaning Accountability Framework Principles underscores our commitment to responsible practices.
- Collaborating with suppliers to track their Modern Slavery progress. We identified that there is further work needed due to complexity of some supply chain sources.
- We continue to directly employ permanent and casual staff for service delivery of contracts, ensuring closer monitoring and reducing exposure.

# AGS STRUCTURE

## About Access Group Solutions

Proudly Australian, Access Group Solutions (AGS) was founded in 1991 and delivers integrated property services seamlessly nationwide.

Our core business is in the provision of services in the areas of cleaning, maintenance, concierge, security, and HVAC professionals. We tailor our services to support clients in Retail, Commercial, Industrial, Education and Government sectors.

At AGS, we take a proactive approach to identifying individual client requirements and customising our services to support their operations, success and growth.

We recognise our main offering is our people, and we prioritise their happiness and motivation by creating a positive work environment and fostering a sense of fulfilment is key to retaining our talented team members.

AGS is proud to directly employ 800 dedicated individuals who are committed to delivering service excellence and creating positive impact on the communities where they work, serving client locations across Victoria, NSW, and the Northern Territory.

Our teams consist of permanent full-time or part-time members, supplemented by casual staff. We recruit team members locally, often through referrals from existing staff or Australian-based online recruitment websites. Occasionally, we engage specialist service providers and special events staff to meet specific needs.

We foster an environment where everyone feels respected, valued, and treated equally. Ensuring fair pay is a priority for us, we adhere to both Modern Awards and National Employment Standards.

Upon successful recruitment, personnel receive comprehensive documentation, including;

- Employment contracts,
- Fair Work Information Statements
- Role definitions,
- AGS Employee Manuals and Codes of Conduct,
- Modern Slavery training via The Supply Chain Sustainability School.
- Access to Employee Assistance Programs, Grievance and Whistleblower programs.



CELEBRATING INCLUSION & DIVERSITY

1991

Business Founded

800

Direct Employees

66+

Locations serviced  
across Australia

18

Suppliers &  
Professional Services

86%

Labour Cost of  
Annual Expenditure

# AGS OPERATIONS & SUPPLY CHAIN

## Recognising the Risks

While Australia is perceived as less susceptible to modern slavery in the Asia Pacific region, we acknowledge potential risks within our industry, including outsourced labour, and the sourcing locations of materials and production of products used.

**Sector/Industry:** The Australian Human Rights Commission highlights labour exploitation in the cleaning and security industries, where workers often face unpaid wages, excessive overtime, threats, and abuse.

**Product/Services:** Acknowledging high risk in labour services, especially with outsourced labour, due to transparency and underpayment concerns. This risk also extends to necessary products that may be imported like uniforms and equipment.

**Geographical Location:** Our exposure to the risk of modern slavery aligns with that of many businesses in Australia, stemming from Australia's reliance on imported products - notably in the electronics and apparel supply.



AGS staff represent a diverse array of cultures, languages and backgrounds.

All AGS personnel are engaged on a permanent or casual basis, ensuring compliance with residency status and visa holder work rights.

Direct employment maintains strong control, preventing involvement in modern slavery practices



## Managing The Risks

At Access Group Solutions, we're taking proactive steps to tackle the risks associated with modern slavery. Our permanent team members are directly engaged.

To address this, we are focused on ethical recruitment practices, ensuring thorough checks on identities and work permits. By directly employing individuals, we can closely monitor payments and entitlements, reducing the risk of exploitation.

Frontline staff who are Australian citizens are working on full or part time employment contracts. The remainder are those who are foreign residents and visa holders. Access Group Solutions requires prospective staff to provide identification copies centrally through the support office for verification of visa work rights, and to ensure the individual's suitability to hold employment. Original documents are not collected or held by the organisation. The high degree of control that direct employment allows, ensures that there is no engagement with modern slavery principles.

Most of our employees work under the Cleaning Services Industry Award 2020 and the Security Services Industry Award 2020 as well as other awards. All employees have access to these Awards, and the pay guides as set out by Fair Work. They are publicly listed documents and are also displayed in staff tea rooms for easy access, along with the Fair Work Information statement.

# AGS OPERATIONS

## Managing the risks in AGS Operations

Access Group Solutions is committed to ensuring compliance with modern slavery requirements through consistent monitoring across recruitment, onboarding, and training processes.

Regular reviews will assess staff understanding of key policies and completion of modern slavery training modules and workshop/toolbox training.

The Whistleblower Committee oversees the monitoring of disclosures lodged with the independent whistleblower, taking responsibility for addressing complaints and implementing necessary remedies throughout the organisation.

External Engagement surveys will provide anonymous feedback channels, fostering open communication for reporting concerns and queries.

Furthermore, senior management will conduct yearly supply chain reviews to validate contractor compliance and ensure the adherence of suppliers to their reporting responsibilities while confirming the necessity of suppliers.

We keep our guard up by regularly reviewing our Modern Slavery Policy, staying up-to-date with the latest regulations. We ensure all our team members understand their rights and responsibilities through comprehensive training sessions. It is all part of our commitment to creating a fair and transparent workplace.

### AWARENESS TRAINING - ONLINE, POSTERS & TOOLBOX



- All personnel must undertake online Supply Chain School course.
- Explanation of labour exploitation and an explanation of how it could present in their environment.
- The spectrum of exploitation from fair work conditions to modern slavery practices.
- How to identify labour exploitation – recognizing signs and knowing who is at greatest risk.
- Channels available for further information and reporting concerns.
- Lunchroom Posters with information and reporting channels.

### DETAILED WORKSHOP TRAINING AND TOOLBOX TRAINING - SNR MGRS & EMPLOYEES



- Understanding what unfair treatment of workers by employers is, including low wages, unsafe conditions, and coercion or threats to freedom.
- Knowing correct Fair work conditions: Fair wages, safe environment, and protected rights.
- Defining what Modern slavery looks like in our industry: Extreme exploitation, including forced labour and human trafficking.
- Identifying Signs: Fearful or anxious workers, high turnover, poor living conditions, and abuse.
- Highlighting At-risk groups: Migrants, undocumented workers, and those in low-skilled industries.
- Reporting Channels: Internal HR, Whistleblower hotline, Red Cross Work Right Hub
- Providing Online resource for managers and workers to report exploitation, seek legal advice, and multilingual support eg. Whistleblower, Red Cross Work Right Hub

### AUDITING - ANNUAL AUDITS



- Anonymous staff surveys that measure experience, satisfaction and other concerns.
- External audits - random sample audits to analyse payroll information, time-sheets and workplace conditions in line with National Standards.
- Participation in external audits initiated by clients' auditors to ensure our operations are in line with Cleaning Accountability Framework.

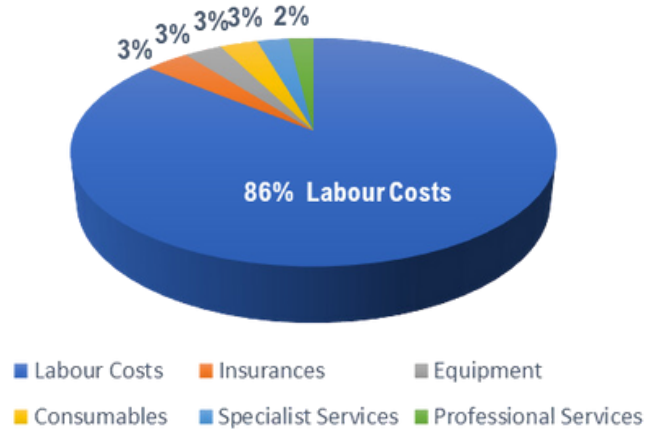


# AGS SUPPLY CHAIN

Access Group Solutions has a short list of preferred suppliers for a wide range of activities undertaken by the business. We source a limited variety of products utilised to support our teams in the provision of services to our Clients.

Working predominantly with local Australian suppliers, the network has been built on transparent relationships with key suppliers, many spanning a number of years.

**AGS ANNUAL EXPENDITURE BY CATEGORY**



Access Group Solutions has a limited number of suppliers who are all locally based and account for approximately 14% of our annual expenditure. These suppliers directly provide resources to our staff and our business operation and can be broadly categorised into two sectors :

## PRODUCTS

- Consumables : *Cleaning supplies, consumables, chemicals.*
- Cleaning machinery & Equipment
- Security Equipment: *Radios, alarms, software programs.*
- Uniforms

## LABOUR

- Outsourced labour hire: *Special events & office temp staff.*
- Specialist Services: *Sanitary, Specialist Clean & Maintenance.*
- Call Center Services: *Whistleblower & alarm monitoring.*
- Professional Services: *Legal and financial services.*

## Managing The Risks In Supply Chain

For our inaugural report, Access Group Solutions has examined Tier 1 suppliers who provide services or products directly to support our business activities.



# ACCESSING OUR ACTIONS

## Collaborative Approach

Access Group Solutions is dedicated to tackling modern slavery through a collaborative approach.

We prioritise building strong relationships and fostering open dialogue to address this critical issue. By making modern slavery a regular conversation topic, we raise awareness about its harmful impacts globally.

Transparency is key as we analyse the findings of our initial modern slavery report and engage in open discussions with clients and suppliers.

We are committed to continuous education to ensure that all stakeholders understand and adhere to the requirements of the Modern Slavery Act.

## Our Commitment

Access Group Solutions is committed to continually improving our efforts to combat modern slavery. We conduct regular reviews of our business practices to ensure compliance with legislative requirements, with updates communicated through appropriate channels. We undergo periodic audits to ensure adherence to required action items.

Disclosures submitted to the Independent Whistleblower Hotline are diligently monitored, with Whistleblower Committee overseeing the resolution of disclosures and the implementation of necessary remedies throughout the organisation.

Furthermore, senior management conducts yearly supply chain reviews to ensure contractor compliance and verify the necessity and adherence of suppliers to their reporting responsibilities, aligning with modern slavery reporting criteria.



## People Evaluation



To assess the effectiveness of our actions, we implement consistent monitoring across recruitment, onboarding, and training processes.

We regularly evaluate staff comprehension of key policies and completion of modern slavery training modules.

Engagement surveys provide an anonymous avenue for feedback, encouraging open communication to report concerns and queries.



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