

MODERN SLAVERY STATEMENT 2022 – 2023

Introduction

Cliftons recognises that every person has the right to live a life that is free from fear, harassment and discrimination, and that everyone is entitled to a universal set of human rights. While we are not required to report by law, Cliftons supports the aims of the *Modern Slavery Act 2018* (Cwlth).

Our Modern Slavery Statement outlines the steps and actions we will undertake to ensure there is no slavery or human trafficking within our organisation or our major supply chains.

Our Business

Cliftons is a trusted partner to corporate and government clients in Australia, New Zealand and across Asia-Pacific and globally for their conference, training and event management solutions. We operate ten multi-purpose, flexible venue facilities in capital cities across Australia, New Zealand and Singapore and organise events globally through affiliate partners. For more information about our business and services visit: www.cliftons.com

Risks of modern slavery and the risk assessment process

Our direct operations

We comply with all applicable employment legislation relating to employee terms and conditions, including pay – which is in line with or above minimum requirements. All Cliftons employees are issued with employment contracts which outline their employment terms and employee rights. We ensure that all direct employees have the appropriate rights to work in the location they are employed in and undergo an identity and visa check as part of our recruitment process.

We maintain high standards for human rights in our workplace to ensure we minimise the likelihood of modern slavery. Some of the activities to uphold human rights in our workplace include:

- Fostering a diverse and inclusive work environment that is free from discrimination, bullying and harassment
- A focus on employee health, safety and wellbeing through risk management and wellbeing initiatives
- Providing flexible work options, rostering and leave benefits allowing permanent employees the right to enjoy recreation, family and a work life balance
- Casual employees are free to decline work shifts
- Our Code of Business Conduct, acknowledged by each employee, sets out policies and guidelines to help employees ensure their conduct and decision-making meets Cliftons standards of integrity – one of our company values

Our employees are encouraged to highlight any concerns regarding modern slavery they may have within our business operations or supply chain, using the appropriate reporting channels as detailed within the Code of Business Conduct, which is provided to and acknowledged by all employees of Cliftons.

We consider our risks of modern slavery in our direct operations to be low.

Our suppliers and their supply chain

We contract with third parties who provide services or goods to assist with the everyday running of Cliftons business operations. These include:

- facility management companies (eg. cleaning, fit outs, waste management);

- affiliate (or partner) venue facilities in Australia or overseas;
- companies who provide IT or technology hardware (eg. cameras, laptops), furniture, catering equipment, uniforms, merchandise or office supplies;
- companies who supply fresh or packed foods, ingredients, coffee, tea, and drinks for hospitality services across our venues;
- companies who provide specialist services (eg audio visual equipment operators, PR, design and marketing agencies, IT & software application support, exam invigilators, presenters and event facilitators)

We recognise that by virtue of contracting with other parties, whether as a client, a supplier, or outsourced contractor, there is some risk that Cliftons may contribute to modern slavery practices. As part of our commitment to combating modern slavery and human trafficking, we will seek out and engage suppliers who aim for high ethical standards and who operate in an ethical, legally compliant and professional manner.

We have developed a Cliftons Supplier Code of Conduct which we require our suppliers to acknowledge and implement. The Supplier Code of Conduct outlines standards required in their operations and supply chain and will ask for information regarding the modern slavery measures they have implemented, including providing a copy of their Modern Slavery statement.

We consider people in our supply chain may be at higher risk of modern slavery practices than our direct employees, and have identified the following potential risk factors:

- Use of low-skilled, casual, and/or migrant labour (eg. in cleaning & waste management services)
- Procurement of IT equipment eg. laptops, computers, phones, (the production of which occurs offshore)
- Use of offshore service providers which are sub-contracted by an approved contractor to high-risk source countries (with low labour costs and limited employee rights).
- Procurement of materials, corporate merchandise, garments (the production of which may occur offshore)
- Procurement of specific foods – fish, rice, coffee, cocoa (which may be sourced from high-risk companies overseas the production of which may involve modern slavery)
- Supplier operations in countries with weak or opaque commitments to human rights

To combat these risk areas, suppliers are required to acknowledge and implement Cliftons Supplier Code of Conduct.

Key areas of focus of our modern slavery management

In 2022-23 we will undertake the following actions:

- establish and assess areas of potential risk in our business and supply chains in a staged approach, with the initial focus on Tier 1 suppliers and partners;
- undertake a due diligence exercise of our current active suppliers, provide them with our Supplier Code of Conduct and request them to comply with the code of conduct and disclose their modern slavery risk mitigation strategies and processes
- update our procurement process so that any new suppliers, are required to accept Cliftons Supplier Code of Conduct and formally disclose their modern slavery risk mitigation strategies as part of the RFP process

- ensure that all leaders, managers and employees involved in management, purchasing or ordering on behalf of Cliftons are provided with training on identifying and preventing modern slavery
- set up a centralised repository for reporting and provide adequate protection for whistle-blowers
- Review our standard contracts and update when and if required
- Hold an annual review process with members of senior management to assess the effectiveness of our actions taken.

Vanessa Green
Chief Executive Officer
Cliftons