

MODERN SLAVERY STATEMENT 2025

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 are undertaking 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 nine 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

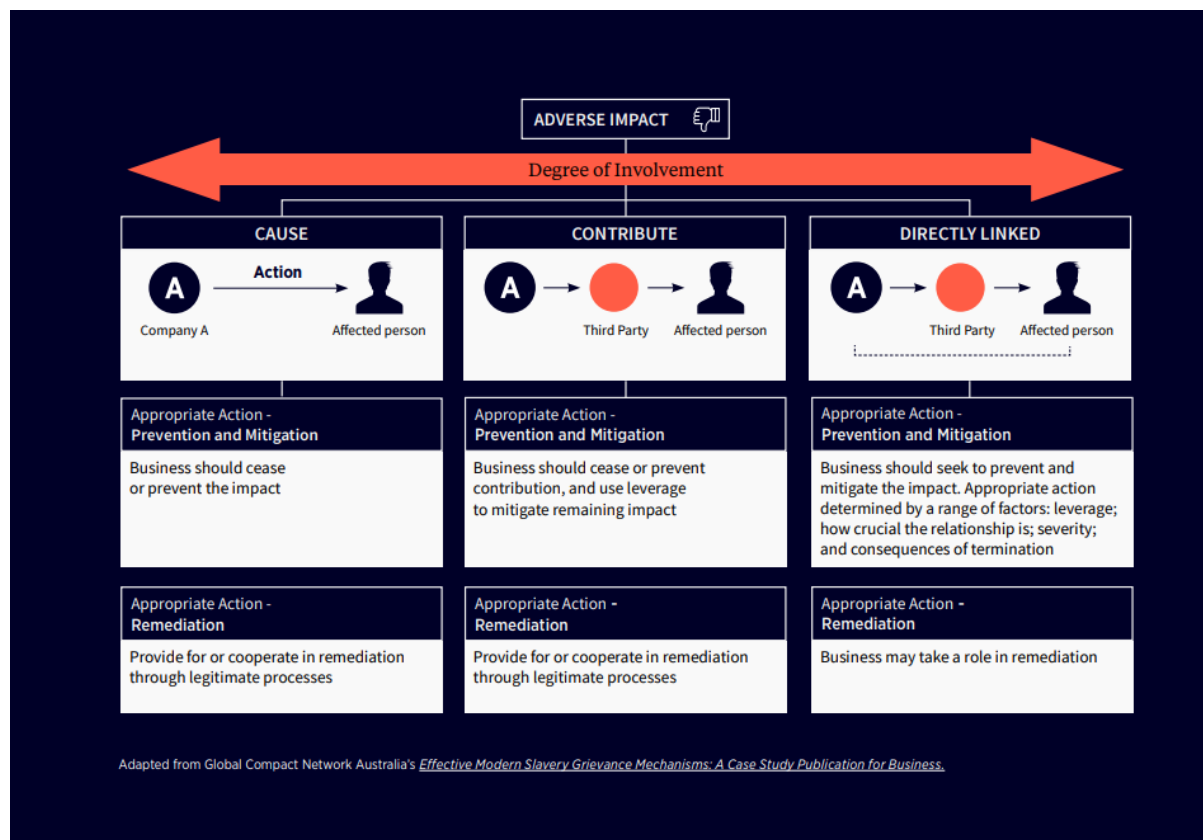
We comply with all applicable employment legislation relating to employee terms and conditions, including pay – which is in line with or above minimum requirements. All Cliftons employees are issued with employment contracts which outline their employment terms and employee rights. We ensure that all 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
- Direct recruitment methods for the majority of roles. When using labour hire or recruitment agencies to source and engage workers, Cliftons only partners with reputable agencies and pays all agency and administration fees.
- 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 report any concerns regarding modern slavery they may have within our business operations or supply chain, using the appropriate reporting channels as detailed within the Cliftons' Code of Business Conduct. All employees also have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through whistleblowing procedures. They are also provided with access to confidential reporting mechanisms.

Our approach follows the Minderoo Foundation's *Walk Free Response and Remedy Framework* to guide appropriate action based on the nature of our involvement.



Source: [Walk-Free-Response-and-Remedy-Framework-1.pdf](#)

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 suppliers include:

- facility management companies (eg. cleaning, fit outs, waste management);
- affiliate (or partner) venue facilities in Australia and overseas;
- outsourced labour supply companies based offshore (in Philippines and India)
These are reputable companies that have been carefully selected;
- companies that provide IT or technology hardware (eg. cameras, laptops), furniture, catering equipment, uniforms, merchandise and office supplies;
- companies that supply fresh or packed foods, ingredients, coffee, tea, and drinks for hospitality services across our venues; and
- companies who provide specialist services (eg audio visual equipment operators, public relations, , design and marketing agencies, IT and 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 seek to engage suppliers that 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 the standards expected in the suppliers' operations and supply chain and asks for information regarding the modern slavery measures they have implemented, including where applicable, 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 and waste management services)
- Procurement of IT equipment eg. laptops, computers, phones, (the production of which occurs offshore)
- Use of offshore service providers that may be sub-contracted by approved contractors 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 higher-risk companies overseas the production of which may involve modern slavery practices)
- 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 for 2025-27

Cliftons will continue to build on its modern slavery risk management framework. Our focus will be on strengthening processes across procurement, supplier engagement, governance, and employee awareness. We will undertake the following actions over the next 12 – 18 months:

1. Supplier Risk Assessment and Due Diligence

- assess areas of potential risk in our business and supply chains, with the continued focus on Tier 1 suppliers and partners;
- undertake a due diligence review of our current active suppliers, requesting that they acknowledge our Supplier Code of Conduct and seeking disclosure of their modern slavery risk mitigation strategies and processes
- review the effectiveness of our procurement process so that all new suppliers, are required to accept Cliftons Supplier Code of Conduct and formally disclose their modern slavery risks or risk mitigation strategies as part of the RFP process or contract negotiation stage
- Introduce a modern slavery questionnaire to be completed by suppliers prior to engagement. This will help us assess supplier practices and segment risk levels.
- Embed modern slavery risk assessments for contracts for the procurement of goods or services exceeding A\$50,000 p.a, or where goods and services are sourced from markets where there is higher risk

2. Employee Training

- Ensure that all leaders, managers and employees involved in management, purchasing or ordering on behalf of Cliftons are provided with training on ethical sourcing, identifying and preventing modern slavery on commencement and biannually

- Review our Modern Slavery Awareness program which includes guidance on identifying red flags and handling suspected cases of exploitation
- Refresh and relaunch organisation-wide procurement training to further raise awareness of our modern slavery related policies and procedures.

3. Direct Labour Controls

- Ensure agreements with recruitment agencies and labour hire firms include a clear “employer-pays” provision, confirming that workers are not charged recruitment, placement or administration fees.

4. Reporting

- Strengthen internal and external channels for reporting concerns related to modern slavery through a “Speak Up” program.
- Explore opportunities for supplier employees to confidentially report suspected unethical labour practices impacting their workplace.

5. Monitoring and Continuous Improvement

- Set up a centralised register to improve monitoring, record keeping and tracking in relation our to modern slavery policies, procedures and reporting
- Hold an annual review process with members of senior management to assess the effectiveness of our actions taken, update our approach and adapt to new risks as they emerge.

By focusing on these priority areas, we aim to proactively manage our modern slavery risk exposure and uphold our responsibility to protect human rights across our operations and supply networks.

Vanessa Green
Chief Executive Officer
Cliftons