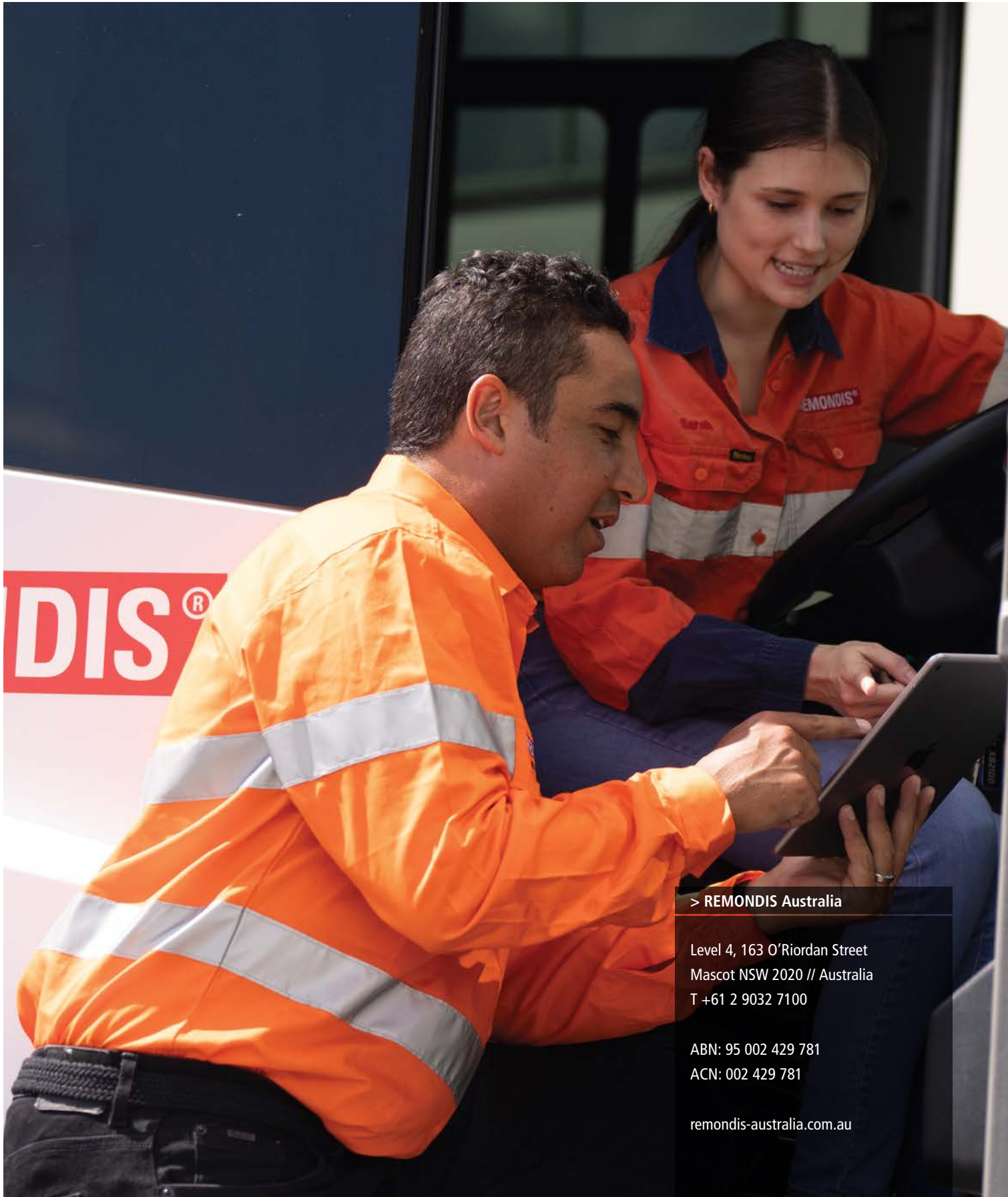


**REMONDIS®**

WORKING FOR THE FUTURE

# REMONDIS Australia Pty Limited Modern Slavery Statement 2022



> **REMONDIS Australia**

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**REMONDIS Australia's operations are conducted on and across the ancestral lands of Australia's First Nations Peoples.**

We acknowledge the traditional custodians of the lands on which our company is located and where we conduct our business. We pay our respects to ancestors and Elders, past and present. REMONDIS Australia is committed to honouring Australian Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual relationships to the land, waters and seas and their rich contribution to society.

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Björn Becker  
Chairman / Director

## Message from our Chairman

REMONDIS Australia Pty Ltd and its related entities (REMONDIS), reaffirm our commitment to a zero tolerance approach to any form of modern slavery in connection with our business. As such, REMONDIS presents its third Modern Slavery Statement in line with our reporting requirements under the Modern Slavery Act 2018 (Cth) (the Act).

This third Modern Slavery Statement outlines the actions REMONDIS has taken since the last reporting period to identify, assess, and address modern slavery risks across our operations and supply chains for the calendar year ending 2022, being the reporting period of this statement (the Reporting Period).

This statement is issued on behalf of REMONDIS and the following non-reporting entities, pursuant to the Act:

- Environmental Treatment Solutions Pty Ltd ACN 126 020 451;
- REMONDIS Aqua Operations Pty Ltd ACN 630 442 812; and
- REMONDIS Aqua Australia Pty Ltd ACN 626 109 313.

In preparing this third Modern Slavery Statement, our Modern Slavery Working Group re-assessed our supply chain risk profile in line with our modern slavery action plan and taking into account that we expanded our national operations with the acquisition of sites at Seven Hills (NSW), Wingfield (SA) and Jandakot (WA).

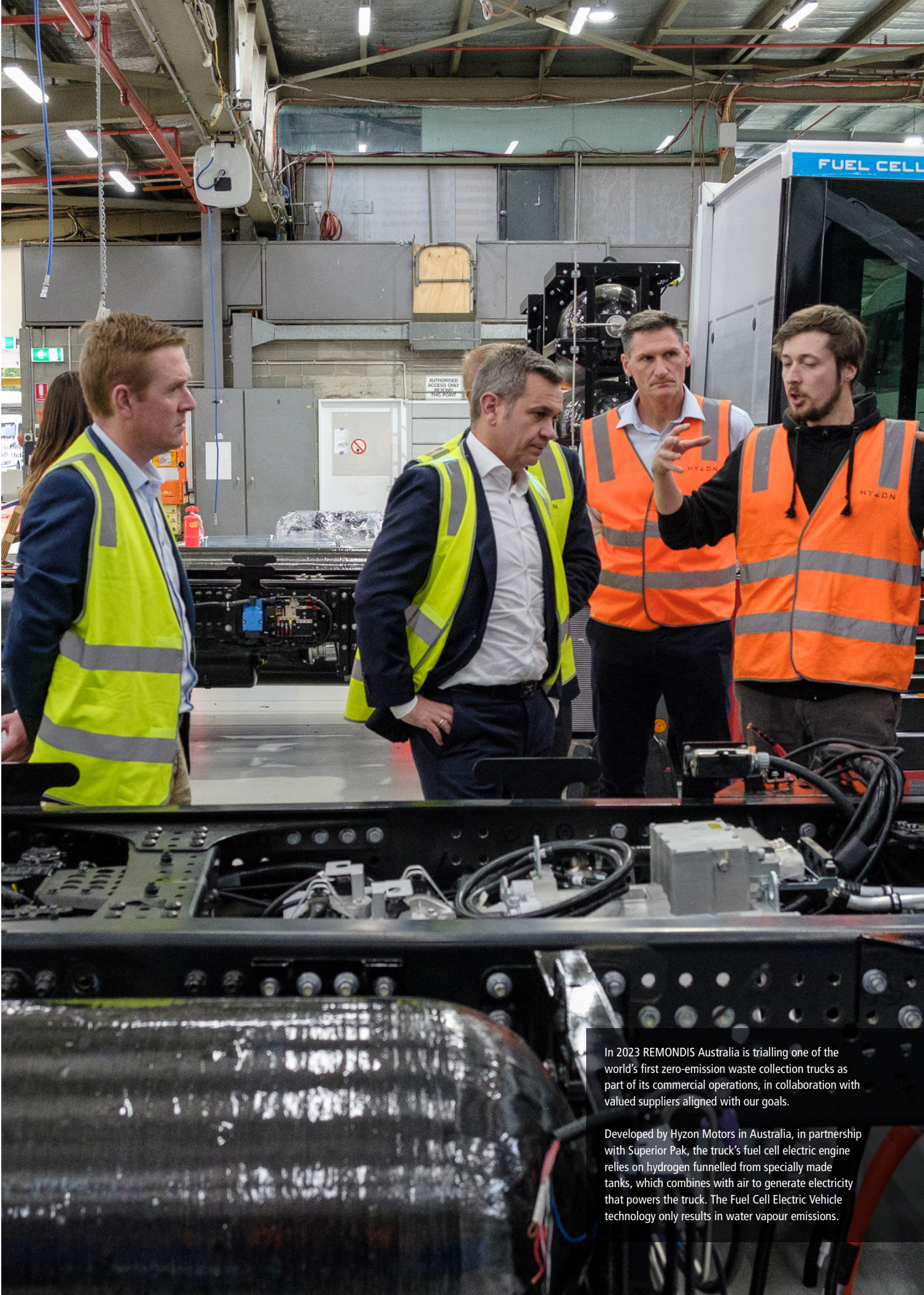
I am pleased to advise that we did not identify any instances of modern slavery in our business or across our supply chain during this Reporting Period.

We have and will continue our efforts to collaborate and raise modern slavery awareness across all of our operations and supply chain and with relevant stakeholders. We will fine tune strategies and processes to better understand and mitigate modern slavery risks in our supply chains and operations in the years ahead. As an essential service provider, we will persist in efficiently engaging with our related entities, and adapt our ways of working with our workers, contractors, suppliers and customers to combat modern slavery and the effects of the post COVID-19 pandemic environment.

I would like to thank all our staff for their commitment and dedication to achieving positive progress in the global initiative to educate, limit and combat any modern slavery practices in our operations and in our industry, and we look forward to achieving our next corporate, social and governance targets for 2023.

Björn Becker  
Chairman / Director  
REMONDIS Australia Pty Ltd

This Modern Slavery Statement was approved by the Board of REMONDIS Australia Pty Ltd on 20 June 2023



In 2023 REMONDIS Australia is trialling one of the world's first zero-emission waste collection trucks as part of its commercial operations, in collaboration with valued suppliers aligned with our goals.

Developed by Hyzon Motors in Australia, in partnership with Superior Pak, the truck's fuel cell electric engine relies on hydrogen funnelled from specially made tanks, which combines with air to generate electricity that powers the truck. The Fuel Cell Electric Vehicle technology only results in water vapour emissions.

## Reporting criteria

This statement was prepared to meet the mandatory reporting criteria set out in the Act. The table below identifies where each criterion is disclosed within the various sections of this Statement and/or where more information can be found.

Modern Slavery Act Reporting Criteria	Relevant Section In Modern Slavery Statement
1. Identify the reporting entity	Message from our Chairman (p4) Our organisation structure, operations and supply chain (p8-9)
2. Describe the reporting entity's structure, operations and supply chains	Our organisation structure, operations and supply chain (p8-9)
3. Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls	Identified risks in our operations and supply chains (p13)
4. Describe any actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Actions taken, assessment of effectiveness and plans for 2023 (p14-16)
5. Describe how the reporting entity assesses the effectiveness of those actions	Actions taken, assessment of effectiveness and plans for 2023 (p14-16)
6. Describe how the process of consultation with any entities that the reporting entity owns or controls	Message from our Chairman (p4)
7. Provide any other relevant information	Our organisation structure, operations and supply chains (p8-9)



# Our organisation structure, operations and supply chains

## REMONDIS Group

The REMONDIS entities set out in the introduction of this statement, are part of the RETHMANN Group. The RETHMANN Group is a 100% family-owned German service and group comprising RETHMANN SE & Co. KG (RETHMANN Parent), (being a limited partnership under German law) and its subsidiaries.

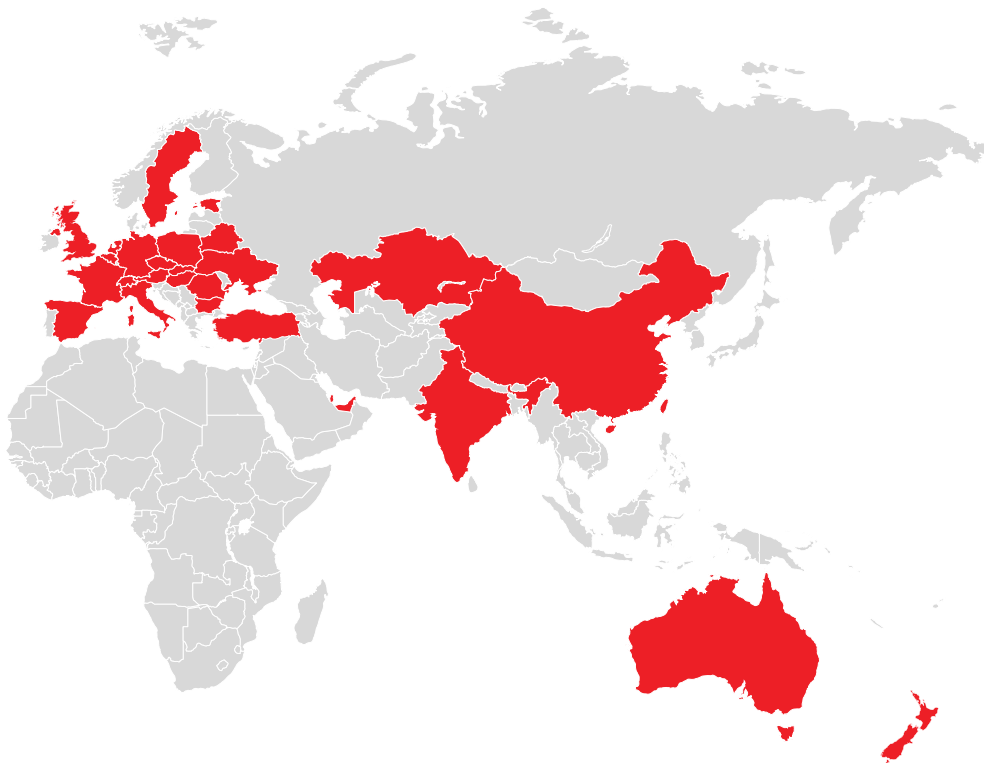
The RETHMANN Group internationally operates in three broad industries: (1) water and environmental services; (2) logistical services and public transport; and (3) biotechnologies. In Australia, many other subsidiaries of the RETHMANN Parent are involved in these industries.

RETHMANN Group is headquartered in Selm, Germany, where it was founded in 1934. It has approximately 98,000

employees and is present in several hundred cities over 4 continents and 50 countries, including Australia.

REMONDIS is a wholly owned subsidiary of REMONDIS SE & Co. KG (a company incorporated in Germany, refer to the REMONDIS International website), which itself is a wholly owned subsidiary of the RETHMANN Parent.

The REMONDIS Group is a leading international waste, recycling, water and environmental service company. Across the world, the REMONDIS Group provides professional services to more than 30 million individuals and thousands of companies, with over 1000 locations in over 30 countries in Europe, Asia and Australia.



> Global

-  1934 established in Germany
-  30+ countries, 4 continents
-  1,000 plants and facilities
-  47,000 employees
-  11,000+ company-owned commercial vehicles
-  200,000+ industrial and commercial customers
-  30 million people benefit worldwide



# REMONDIS in Australia

Operating locally in Sydney since 1982, REMONDIS has grown and diversified to become one of the largest waste and recycling companies in Australia. Acclaimed for our focus on customer support and service excellence, we work collaboratively with our customers and local authorities to deliver innovative, safe and reliable solutions across all industry sectors.

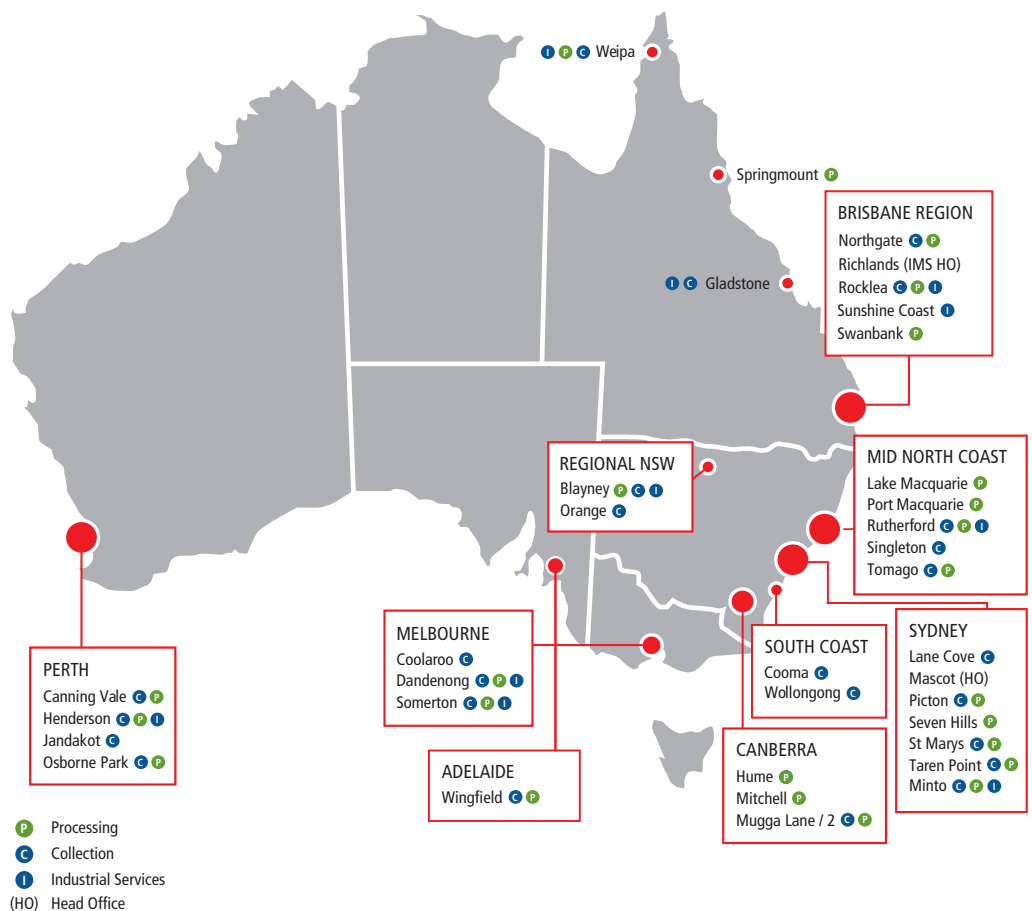
REMONDIS provides waste collection services to more than 24,000 commercial customers and, through partnerships with local authorities, approximately 2 million residential premises. REMONDIS is the proud employer of approximately 891 Australian employed personnel (excluding labour hires), as at the end of the Reporting Period.

municipal customers. Our business locations map shows the newly acquired Jandakot, Wingfield and Seven Hills sites as a result of the Veolia/SUEZ acquisition in April 2022, which has significantly expanded our operations with additional property, equipment, vehicles, customers, suppliers and contractors.

With 39 business locations across cities and regional areas of Australia, REMONDIS continues to fulfil customer needs across a majority of locations nation-wide, passing on the benefits of operational efficiencies to both commercial and

**> Australia**

-  1982 established in Australia
-  39 business locations
-  Around 900 employees
-  550+ collection vehicles
-  24,000 commercial and industrial customers



# Our business and operations

Our business operates under an Integrated Business Management System, which encompasses internationally accredited Quality, WHS, Environmental Management Systems, as well as supporting Human Resources and Operational Management to deliver service excellence to all our customers.

## Our stakeholders

REMONDIS prides itself on developing long-term relationships with its customers, contractors and suppliers.

### People

Competent, experienced and multi-disciplinary site representatives and drivers

### Systems

- Quality management
- Environmental management
- Health & Safety management



### Facility

- Management
- Landfills
- Materials Recovery Facilities
- Resource Recovery Facilities
- Organics Recycling Facilities
- Transfer Stations
- Energy from Waste
- Water Treatment Plant

### Equipment

- 550+ collection vehicles
- Heavy plant equipment
- Mobile garbage bins
- Hook lift bins
- Compactors & balers
- Shredders
- De-packaging plant
- Refuse Derived Fuel plant
- Centrifuges

# Waste streams

We provide waste management services to our customers based on the following waste streams:



## COMMON RECYCLABLES

- Co-mingled
- Glass
- Paper & cardboard
- Plastic containers
- Steel containers
- Aluminium containers



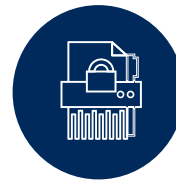
## CLINICAL & RELATED WASTE

- Anatomical
- Clinical
- Cytotoxic
- GMO
- Medical
- Pharmaceutical
- Sharps



## OTHER RECYCLABLES

- Bulk bags
- Paint
- Polystyrene
- Soft plastics



## SECURE WASTE

- Confidential paper
- Product destruction



## LIQUID WASTE

- Grease trap
- Drill mud
- Effluent
- Oily water
- Septic & sullage
- Storm water
- Waste oil
- Ship bilge wash water
- Sludge



## HAZARDOUS & REGULATED WASTE

- Acids & alkalines
- Asbestos
- Chemicals
- Contaminated soil
- Detergents & solvents
- Drums, bags & IBCs
- E-waste
- Oily rags & filters
- Paints, inks & dyes
- Quarantine waste
- Resins & latex



## ORGANIC WASTE

- Biosolids
- Food
- Garden organics



## GENERAL WASTE

- Any residual material that is not technically or financially viable to recycle



## CONSTRUCTION & DEMOLITION WASTE

- Brick
- Concrete
- Metal
- Timber

## Our supply chains

**REMONDIS did not detect any instances of modern slavery practices, nor were any reports of modern slavery received via any reporting channels.**

Although REMONDIS' supplier spend during the Reporting Period increased as a result of the 2022 acquisition of the Seven Hills (NSW), Wingfield (SA) and Jandakot (WA) sites from approximately \$300 million to \$350 million, we are pleased to advise that we did not detect any instances of modern slavery practices during this Reporting Period, nor did we receive any reports of concerns in relation to modern slavery practices in our business or across our supply chain via our reporting channels.

REMONDIS evaluates every division our supply chain and continues to place a high level of importance on conducting our business with suppliers or contractors that have similar values and ethical business practices to us in relation to modern slavery. A core focus of managing the relationships with our suppliers is ensuring that they share our commitment to social and environmental responsibilities. We intend to continue to build meaningful relationships and mechanisms for support and awareness within our supply chain. As such, the majority of our suppliers who are preferred by REMONDIS are either:

- large scale Australian corporations who have published a modern slavery statement under the Act, being reporting entities themselves (eg entities in the petroleum, vehicle/equipment, construction, building and waste industry); or
- small to medium Australian enterprises (SME's) with whom we work closely with including subcontractors, cleaning, security, labour hire & recruitment services, insurance/accounting, IT and other professional service providers, (being Australian based sites with direct onsite activities).

An example of how these principles have been applied by us in practice this Reporting Period is the decision to purchase trailers and skip loader bodies from two local Australian manufacturers (MaxiTRANS and West-Trans Equipment) instead of contracting with overseas suppliers with a potentially higher modern slavery risk profile. REMONDIS commends our Fleet team for its modern slavery focused procurement initiative.

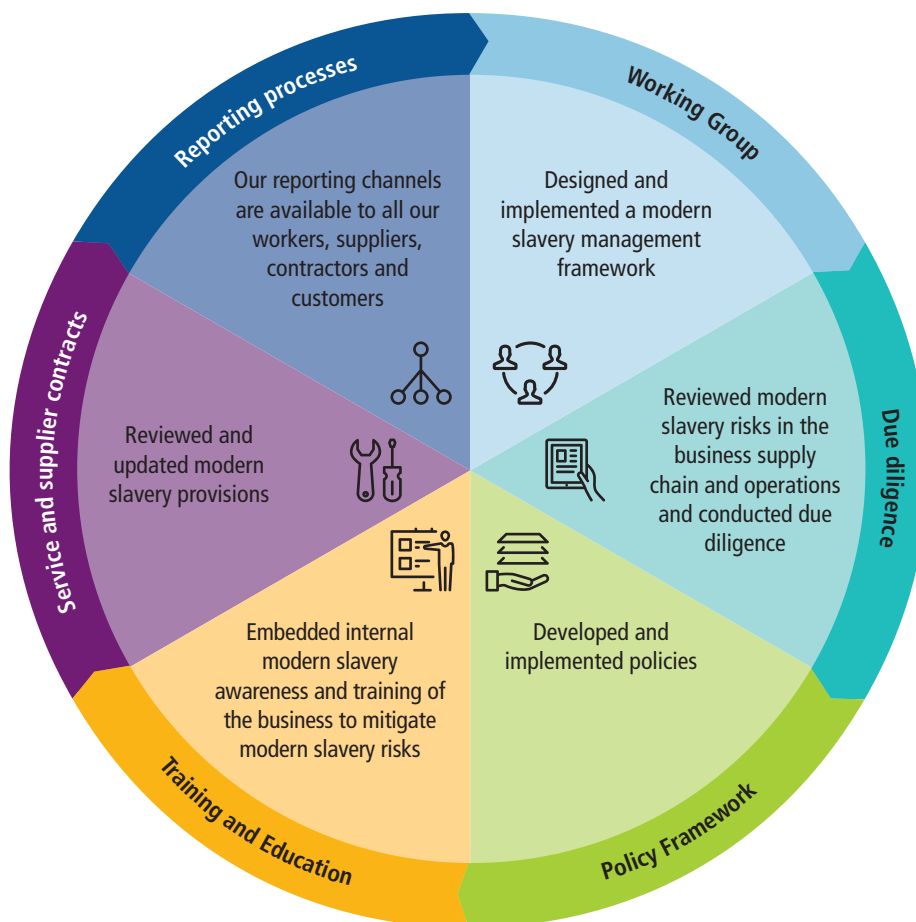
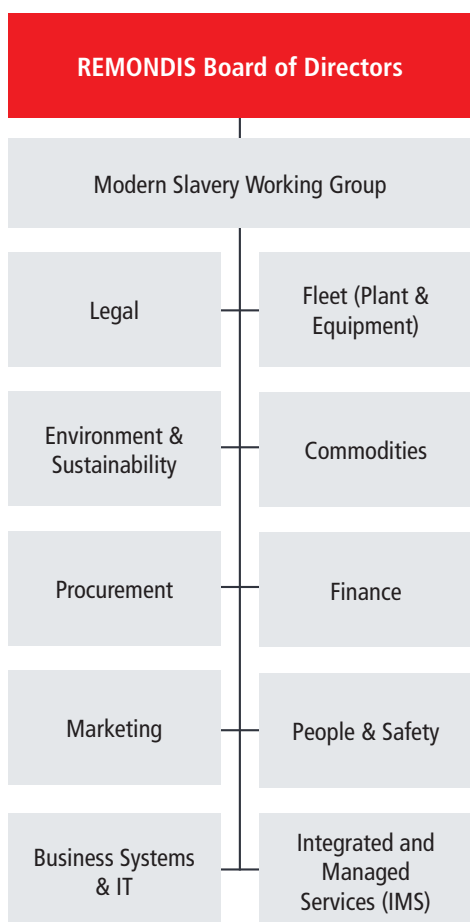


# Identified risks in our operations and supply chains

We have identified our higher risk category suppliers to be mainly in the areas of IT, construction services, PPE gear, vehicle/equipment procurement and small operators such as cleaning and recycling facilities (as set out in our previous Modern Slavery Statements).

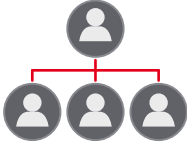


These higher risk categories include labour rights and working conditions of overseas manufacturers and work sites to which we have limited visibility. Given that some of these products (or otherwise their parts) are sourced and manufactured offshore, as per the REMONDIS International supply model, REMONDIS' visibility and control over the working conditions of overseas manufacturers of these products, services, equipment and materials remains limited.



We continue to monitor, review and work on our ability to assess the geographical risks in our extended supply chain overseas. Although no instances of modern slavery have been identified in this Reporting Period, we will continue to explore appropriate remediation alternatives to combat modern slavery risks, should any be identified in the future.





# Actions taken, assessment of effectiveness and plans for 2023

During the Reporting Period, REMONDIS assessed the effectiveness of actions taken to address modern slavery risks and plans for its 2023 reporting period as follows:

Actions	Assessment of effectiveness	Plan for 2023
<p>Working Group</p> 	<p>Our Modern Slavery Working Group continues to monitor and look for ways to support and adhere to our modern slavery management framework. The Working Group has continued to monitor media and news from our sector and relevant industry groups to identify emerging human rights risks in various geographic locations, particularly those locations where we source products or services, so that REMONDIS can inform our workers and suppliers about current and emerging trends and modern slavery risks.</p>	<p>Our Modern Slavery Working Group will continue its efforts to ensure our action plan milestones are achieved.</p> <p>We will continue working with our relevant business units, procurement specialists and suppliers in order to assess the effectiveness of our procurement processes and will work with each of them to develop new ways to address modern slavery risks, including overseas assessments and local audit programs.</p>
<p>Websites</p> 	<p>Our remondis-australia.com.au website includes a public link to our Modern Slavery Statements over the last few years and contains our current and past corporate and social responsibility targets and objectives, documented in our Sustainability Reports.</p>	<p>REMONDIS is always looking for better ways to be equipped to respond to modern slavery enquiries from our contractual counterparties, customers or media on our various platforms (including social media).</p> <p>Our Redooo business is re-launching its website in 2023.</p>
<p>Due Diligence &amp; Questionnaires</p> 	<p>We maintained our existing due diligence check on top suppliers (by spend and in the relevant categories of identified risk).</p> <p>Any new suppliers onboarded through our Integrated Managed Services division (REMONDIS IMS), had questionnaires issued as part of their onboarding assessment criteria, and performed an assessment in relation to existing suppliers when their contracts came up for renewal. No questionnaire responses raised any concerns about actual or potential modern slavery practices (noting we focused our evaluation and assessed the onboarded Veolia /SUEZ suppliers and contractors as a result of the acquisition across three sites nationally).</p> <p>While we mainly dedicated our resources to reviewing and assessing the targeted SME suppliers, we also researched policies and ethical sourcing initiatives of our larger suppliers during this Reporting Period.</p>	<p>REMONDIS will be undergoing continuous improvement of our due diligence analysis and monitoring processes of existing and new suppliers.</p>

Actions	Assessment of effectiveness	Plan for 2023
<p>Training and Education</p> 	<p>REMONDIS has embedded within our business internal modern slavery awareness and training during the Reporting Period.</p> <p>REMONDIS will continue to develop and provide training and education to management and relevant teams, including through employee newsletters, induction training, and refresher training.</p> <p>We believe we have made considerable progress in improving our workers awareness of how to identify risks (including individuals/business sectors which may be at higher risk), how to respond, report and effectively remediate.</p>	<p>We are in discussions with our parent compliance team in Germany in relation to producing a global online modern slavery learning module which can be locally rolled out in our existing Donesafe platform. Such training can be easily accessible by our workers, and can be made available to our suppliers, and with consistent messaging in relation to these mandatory modern slavery principles across the REMONDIS Group globally.</p> <p>Ongoing training and internal awareness for our business will continue to be adapted, especially for new workers being onboarded.</p>
<p>Reporting Processes</p> 	<p>REMONDIS received no reports of modern slavery practices or instances under any of our reporting methods.</p> <p>While we always strive to remain vigilant, our reporting channels are available to all our workers, suppliers, contractors and customers who are able to raise any concerns with a member of REMONDIS' Legal or People &amp; Safety team, a REMONDIS manager, or general manager, a REMONDIS director or report in accordance with our Whistleblower Protection Policy, which provides details for both internal and external reporting mechanisms (also set out in the Supplier Code of Conduct).</p>	<p>REMONDIS will continue promoting its reporting methods to be easily accessible to all workers, suppliers, contractors and customers so that any instance of modern slavery practices can be addressed in our supply chain.</p> <p>REMONDIS will also continue working with BDO (its external reporting channel) to ensure that any potential anonymously reported practices of modern slavery are swiftly dealt with should any be identified.</p>

Actions	Assessment of effectiveness	Plan for 2023
<p>Policy Framework</p> 	<p>The following supplemental policies have been operating concurrently at REMONDIS during the Reporting Period:</p> <ul style="list-style-type: none"> <li>■ Whistleblower Protection Policy – outlining the reporting processes for any unacceptable conduct, including modern slavery practices.</li> <li>■ REMONDIS Australia Code of Conduct &amp; Corporate Compliance Code of Conduct – since 2016, the 5th business principle ‘Respect for human rights and fair working conditions – no compromises’, has been instilled globally across the REMONDIS Group.</li> <li>■ Anti-Slavery Policy – provides the policy framework for identifying, assessing, addressing, minimising and mitigating modern slavery risks.</li> <li>■ Supplier Code of Conduct – all REMONDIS suppliers are expected to not only comply with our Supplier Code of Conduct but also implement it in their own supply chain. We can provide guidance to suppliers on this Code when requested so that we can collaboratively strive for continual improvement in achieving our ethical procurement goals.</li> <li>■ Sustainability Objectives &amp; Targets 2023 – sets out our objectives and targets for 2023 across the environment, social and governance aspects of our business including SGD 5.1 and 8.7 alignment with modern slavery initiatives.</li> </ul>	<p>As REMONDIS reviews, updates, and introduces new policies throughout its business, we will ensure that each policy aligns with or is consistent with our modern slavery commitments.</p>
<p>Contracts</p> 	<p>REMONDIS inserted prescriptive modern slavery provisions in its standard construction contracts and works order arrangements to be consistent with the contractual improvements made to our other contracts in the previous Reporting Period.</p> <p>Our supplier onboarding process is ensuring that any new supplier arrangements and contracts will include our standardised and prescriptive modern slavery provisions (together with completing our due diligence supplier questionnaire) so that, at a minimum, these suppliers meet our expectations as a condition of conducting business with us.</p>	<p>We will continue to update and revise standard contractual provisions, as required from time to time in order to tighten expectations and obligations on our suppliers, including our upcoming ‘preferred service provider agreement’ as a REMONDIS IMS subcontracting template.</p>







WORKING FOR THE FUTURE

Established locally in 1982, REMONDIS Australia is part of one of the largest recycling, service and water companies in the world.

As a family-run company and a leader in the delivery of environmental solutions, REMONDIS Australia has approximately 900 employees and 550 vehicles operating from our advanced facilities across Australia.

As one of Australia's leading recycling and waste management companies, we leverage our local knowledge and global expertise to serve more than 24,000 industrial and commercial customers throughout the country.

By sharing our knowledge and expertise, diverting waste from landfills and supporting responsible waste management practices, we believe we can work together to bring our vision of a sustainable Australia closer to reality.

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