

POLICY

Anti-Slavery Policy

Aim of this Policy

REMONDIS Australia Pty Ltd and its related entities (REMONDIS, we, our, us), are committed to conducting its business to limit the risk of modern slavery occurring internally or being infiltrated through our supply chain or other business relationship.

We expect all who have or seek to have a business relationship with REMONDIS to familiarise themselves with and act at all times in a manner consistent with the values set out in this policy.

We will only do business with organisations who fully comply with this policy (or supplier code of conduct reflecting this policy) or those who take verifiable steps towards compliance.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspects of our business and business relationships.

This policy applies to all persons working for or on our behalf in any capacity including employees, directors, officers, contractors, consultants and volunteers (collectively ‘workers’).

For the purposes of this policy “anti-slavery” is referenced as “modern slavery”, as this policy also supports the intent of international conventions, treaties and protocols relevant to combatting modern slavery, the requirements under the Modern Slavery Act 2018 (Cth), and the policies of REMONDIS internationally.

This policy will be used to underpin and inform our first statement on modern slavery which we are required to provide as a reporting entity by 30 June 2021, and each subsequent year.

Our Commitment

We are committed to:

- taking necessary action, where appropriate, to address, mitigate and prevent any modern slavery in the operations of REMONDIS and our broader supply chain;
- implementing systems to ensure that modern slavery is not occurring within REMONDIS, or our supply chain; and
- encouraging all individuals and organisations involved with, or employed by REMONDIS, to understand the severe consequences that modern slavery poses to people and potential victims.

What do we mean by Modern Slavery?

Modern slavery is a serious crime and major violation of fundamental human rights. While there is no specific legal definition of modern slavery it is used to describe serious exploitation which can take many forms and includes: (a) trafficking in persons; (b) slavery; (c) servitude; (d) forced marriage; (e) forced labour; (f) debt bondage; (g) forms of child labour; and (h) deceptive recruiting for labour or services. What is common to victims of modern slavery is that they are in situations where coercion, threats or deception are used to exploit, undermine or deprive them of their freedom.

How we seek to embed our Anti-Slavery Policy in practice:

Our Supply Chain

We recognise that as a global market leader REMONDIS’ response to modern slavery helps mitigate instances of modern slavery in the multi-national business environment in which we operate. We seek to be involved with suppliers that have similar values and ethical business practices to us in relation to modern slavery.

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At REMONDIS our supply chain extends to labour engaged to undertake any waste management, recycling and environmental services within Australia and the provision of products and services sourced within, and outside of Australia for the effective operation of our company and our businesses nationally. The majority of REMONDIS' waste management, recycling and environmental services operate within Australia, with some products, parts and services being sourced from overseas.

It is important to REMONDIS to build meaningful relationships and mechanisms for support and awareness within our supply chain. Clear and honest channels of communication with our supply chain ensure that our expectations in relation to modern slavery are understood and any suitable remedial action can be taken in a timely manner. We understand that the circumstances of each individual supplier can mean that risks of modern slavery and any required remedial action may differ.

We are committed to conducting periodic risk assessments to determine which parts of our business and which of our supply chains are most at risk from modern slavery. When undertaking and reviewing risk assessments regard will be had to:

- geographical risks of modern slavery;
- sector and industry risks of modern slavery;
- product and services risks; and
- entity risks.

We will be rolling out a modern slavery due diligence questionnaire to target suppliers or classes of suppliers. Answers to this questionnaire will provide us with a greater understanding of the risk of modern slavery within our supplier's chain or operations and enable us to work effectively with a supplier to reduce any modern slavery risks identified.

REMONDIS is also working on implementing a supplier code of conduct so that, at a minimum, our expectations are met as a condition of doing business.

Our Contracts

Our contractual documentation incorporates specific prohibitions against modern slavery in line with this policy. We will also make provision for our contracted suppliers to hold their own suppliers to the same standards as contained in this policy and in the supplier code of conduct.

Our Wider Community

It is also important to REMONDIS to foster relationships with reputable civil society organisations to ensure we strengthen our response to modern slavery. REMONDIS encourages all workers and suppliers to engage with civil society organisations that have expertise in understanding modern slavery. Our workers and suppliers can help make a difference by being appropriately equipped to identify suspected situations of modern slavery and by understanding that the interests of the victim are always paramount.

Communication and Awareness Training

REMONDIS will ensure that all workers receive adequate training on this policy and any supporting processes applicable to their role. Such training will form part of our on-boarding and induction processes.

In addition, our workers will receive regular legal compliance training on the broader issues of modern slavery to assist them in: (a) appreciating the extent of the problem of modern slavery; (b) identifying individuals/business segments which may be at risk from practices of modern slavery; and (c) knowing how to respond or report it.

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Reporting channels and remedial action

It is important to us that our workers and our suppliers are aware of the risks of modern slavery and this policy, and how to escalate any concerns. Whilst we have a zero-tolerance approach, we understand that terminating a business relationship has the potential to be more damaging to a victim of modern slavery. As such, it is important to us that our workers (at all levels) take action if they suspect or become aware of any modern slavery practices occurring so that we can respond appropriately.

Any worker or supplier who suspect or become aware of modern slavery practices at REMONDIS or an organisation that is a part of the REMONDIS' supply chain should raise those concerns with a member of the Legal or People & Safety team, their immediate manager, general manager, a REMONDIS director or report under our Whistleblower Protection Policy. Alternatively, workers and suppliers can report directly to the Australian Federal or State Police.

If modern slavery practices are identified internally or within our supply chain, necessary remedial steps will be taken to prevent, mitigate and cease the practices or any contribution by REMONDIS to those practices. Where appropriate, we will seek advice and assistance from external agents or expert providers to ensure that we are responding in the most effective manner.

Breach of this Policy

Any breaches of this policy will be treated seriously and will be investigated and dealt with on a case by case basis.

A breach of this policy by a worker may lead to disciplinary action in accordance with any relevant disciplinary policy or procedure, taking into account no detrimental harm to any victim of modern slavery.

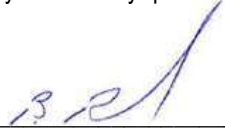
Everyone to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy, or any related processes or procedures.

Review

This policy will be reviewed annually by the General Counsel and may be amended from time to time.

Further Information

If you have any questions or queries in relation to this policy, please contact the Legal or People & Safety team.



Date: 16/02/2021

Björn Becker
Managing Director / Chief Executive Officer

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Glossary

Term	Explanation
Child labour	<p>Child labour, in accordance with the definition used by the International Labour Organisation, is work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. A child is defined as a person below the age of 18.</p> <p>Child labour refers to work that:</p> <ol style="list-style-type: none"> 1. is mentally, physically, socially or morally dangerous and harmful to children; and/or 2. interferes with their schooling by: <ol style="list-style-type: none"> a) depriving them of the opportunity to attend school; b) obliging them to leave school prematurely; or c) requiring them to attempt to combine school attendance with excessively long and heavy work. <p>Child labour has three categories:</p> <ol style="list-style-type: none"> (1) The unconditional worst forms of child labour, which are internationally defined as slavery, trafficking, debt bondage and other forms of forced labour, forced recruitment of children for use in armed conflict, prostitution or pornography, and illicit activities. (2) Labour performed by a child who is under the minimum age specified for that kind of work (as defined by national legislation, in accordance with accepted international standards), and that is this likely to impede the child's education and full development. (3) Labour that jeopardises the physical, mental or moral well-being of a child, either because of its nature or because of its nature or because of the conditions in which it is carried out, known as "hazardous work".
Debt bondage	Debt bondage describes situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
Deceptive recruiting for labour services	Deceptive recruiting for labour services describes the situations where the victim is deceived about whether they will be exploited through a type of modern slavery.
Forced labour	Forced labour describes situations where the victim is either not free to stop working or not free to leave their place of work.
Forced marriage	Forced marriage describes situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
Modern slavery	The <i>Modern Slavery Act 2018 (Cth)</i> (the "Act") defines modern slavery a term used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services; and the worst forms of child labour.
Policy	A policy refers to documented guidelines or rules of conduct within an organisation. Human rights-related policies generally fall into two categories: stand-alone statements and policies that are integrated within an organisation's wider standards literature (eg. codes of conduct and ethical sourcing standards).
Servitude	Describes situations where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work.
Slavery	Describes situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
Trafficking in persons	Trafficking in persons describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.