

REMONDIS®

WORKING FOR THE FUTURE

REMONDIS Australia Pty Limited Modern Slavery Statement 2021



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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

It is with great pleasure that I present REMONDIS' second Modern Slavery Statement in line with our reporting requirements under the Modern Slavery Act 2018 (Cth) (the Act).

REMONDIS Australia Pty Ltd and its related entities (REMONDIS), have continued to uphold a zero tolerance approach to any form of modern slavery in connection with our business. Having recently expanded our national footprint through the acquisition of new operations at Seven Hills (NSW), Wingfield (SA) and Jandakot (WA), we have achieved significant growth as a major industry participant in waste management, resource recovery, water and environmental services both in Australia and globally.

This second Modern Slavery Statement outlines the actions REMONDIS has taken since the last reporting period (ending 31 December 2020) to identify, assess, and address modern slavery risks across our operations and supply chains for the calendar year ending 2021, 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:

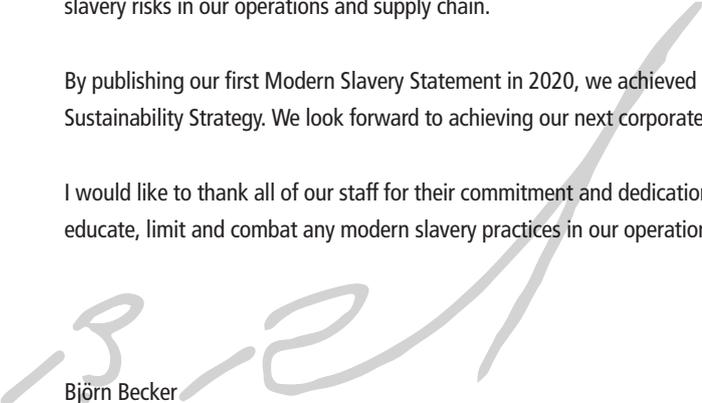
- Environmental Treatment Solutions Pty Ltd ACN 126 020 451;
- REMONDIS Aqua Operations Pty Ltd ACN 630 442 812; and
- REMONDIS Aqua Australia Pty Ltd ACN 626 109 313.

In preparing this second Modern Slavery Statement, our Modern Slavery Working Group evaluated and re-assessed our supply chain risk profile, implementing the Board approved modern slavery action plan.

In 2021, the COVID-19 pandemic continued to cause disruption in Australia and globally. However, REMONDIS as an essential service provider endured through local lockdowns while efficiently engaging with its related entities, workers, contractors, suppliers and customers about modern slavery. We are continuing to collaborate and raise awareness across our operations and supply chain with relevant stakeholders and to develop strategies and processes to better understand and mitigate modern slavery risks in our operations and supply chain.

By publishing our first Modern Slavery Statement in 2020, we achieved alignment with the relevant objectives with our 2021 Sustainability Strategy. We look forward to achieving our next corporate, social and governance targets for 2022.

I would like to thank all of our staff for their commitment and dedication to achieving progress in the global initiative to educate, limit and combat any modern slavery practices in our operations and in our industry.



Björn Becker
Chairman/Director
REMONDIS Australia Pty Ltd

This Modern Slavery Statement was approved by the Board of REMONDIS Australia Pty Ltd on 14 June 2022



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 and assessment of effectiveness (p14-15)
5. Describe how the reporting entity assesses the effectiveness of those actions	Actions taken and assessment of effectiveness (p14-15)
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) Plans for 2022 (p16)



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 72,000

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
-  1000 plants and facilities
-  40,000+ employees
-  11,000+ company-owned commercial vehicles
-  200,000+ industrial and commercial customers
-  30,000,000+ 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.

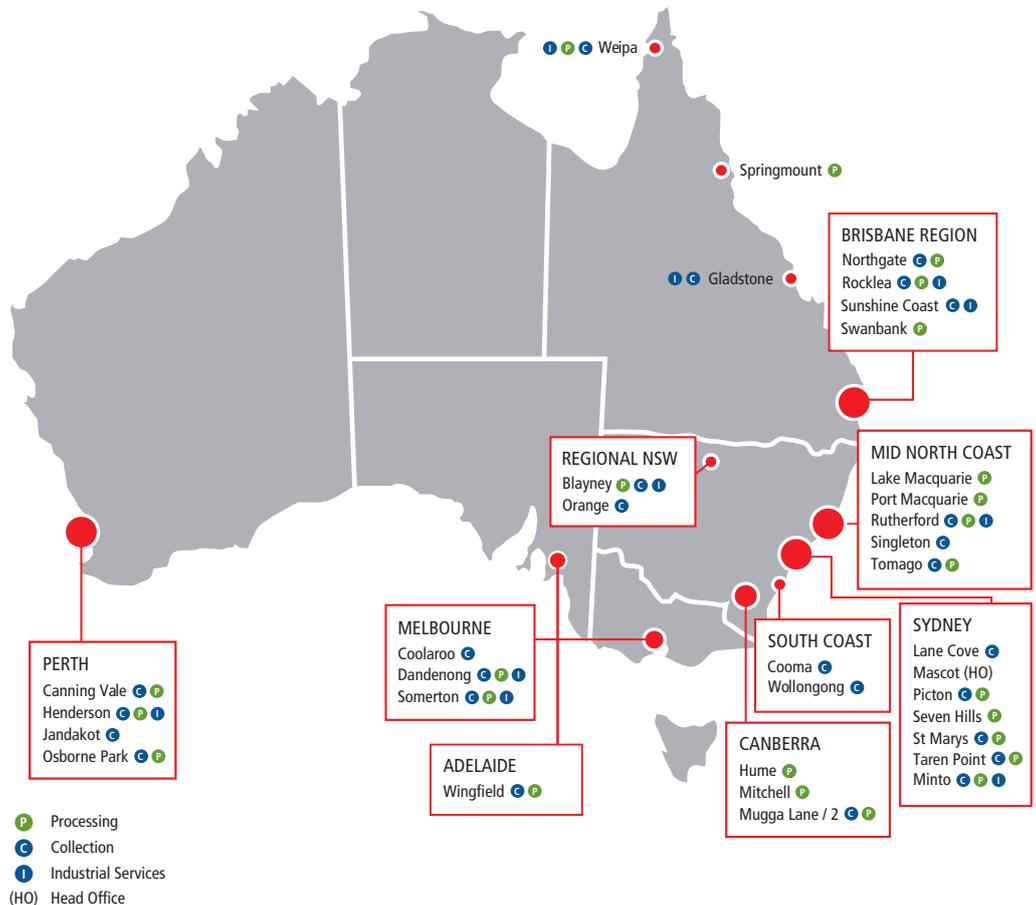
REMONDIS provides waste collection services for more than 24,000 commercial customers and, through partnerships with local authorities, approximately 2 million residential premises.

With over 35 business locations across cities and regional areas of Australia, REMONDIS continues to fulfil customer needs across a majority of locations nationwide, passing on

the benefits of operational efficiencies to both commercial and municipal customers. Our business locations map shows the newly acquired Jandakot, Wingfield and Seven Hills sites, which has significantly expanded our operations with additional property, equipment, vehicles, employees, customers, suppliers and contractors.

> Australia

-  1982 established in Australia
-  35+ depots
-  1100+ employees
-  600 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



COMMON RECYCLABLES

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



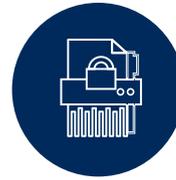
CLINICAL & RELATED WASTE

- 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 spent over \$300 million with over 2000 suppliers during the Reporting Period. We did not detect any instances of modern slavery practices, nor were any reports of modern slavery received via any reporting channels.

We seek to conduct business with suppliers and contractors that have similar values and ethical business practices to us in relation to modern slavery. We intend to continue to build meaningful relationships and mechanisms for support and awareness within our supply chain. The majority of our suppliers in our supply chain are either:

- larger scale Australian corporations (i.e. larger than REMONDIS) who have published a Modern Slavery Statement under the Act, being reporting entities themselves; or
- small to medium enterprises (SME's) being Australian based sites with direct on-site activities.

The products and services we procure continue to have an inherent risk of modern slavery, and we acknowledge that there is more work to be done to better understand the following:

- geographical risks such as commodity trading site and products (or their parts) manufactured in overseas locations;
- sector and industry risks, such as construction, building, waste industry (including third party recycling centres & landfills);
- product and services type risks, such as cleaning, security, labour hire and recruitment services; and
- small business entity risks (with respect to any of the above).

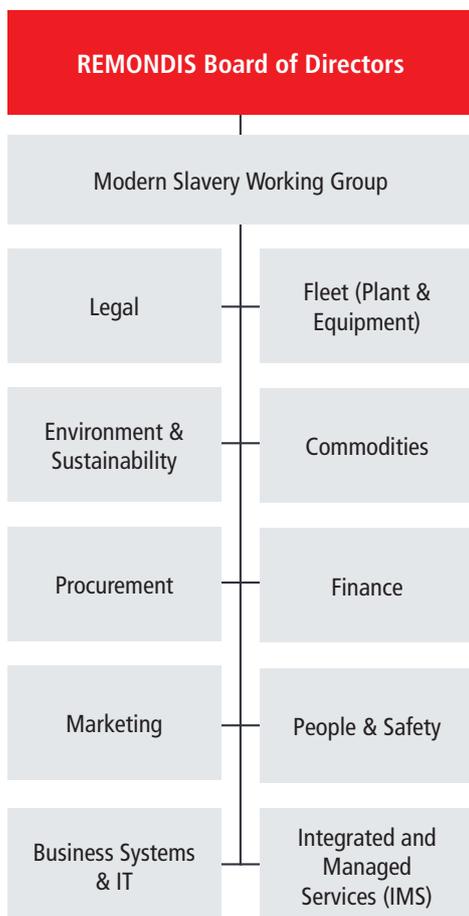


Identified risks in our operations and supply chains

Our higher risk categories continued to be in the area of IT, construction services, PPE gear, vehicle/equipment procurement and small operators of 'business as usual' services such as cleaning and recycling facilities (as set out in our first Modern Slavery Statement).

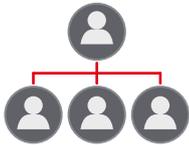
These higher risk categories include labour rights and working conditions of overseas manufacturers and work sites to which we have limited visibility. Given that some of these products (or otherwise their parts) are sourced and manufactured offshore, as per the REMONDIS International supply model, REMONDIS'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

During the Reporting Period, REMONDIS assessed the effectiveness of different actions taken to address modern slavery risks as follows:

Actions	Effectiveness of actions
<p>Working Group</p> 	<p>Our dedicated Modern Slavery Working Group has designed and implemented a modern slavery management framework. The Working Group report to the REMONDIS Board and consists of the business unit stakeholders shown in the chart on page 13. The Working Group met regularly during this Reporting Period in order to address and implement our modern slavery action plan and will continue to meet on a quarterly basis. The Working Group will also continue to monitor media and news from our sector and relevant industry groups to identify emerging human rights risks in various geographic locations, particularly in locations where we source products or services, so that REMONDIS can inform our workers and suppliers about current and emerging trends on modern slavery risks.</p>
<p>Due Diligence & Questionnaires</p> 	<p>We conducted due diligence with our top 300 suppliers (by spend and in the relevant categories of identified risk), and sought for them to complete our supplier questionnaire and adopt our Supplier Code of Conduct in their own supply chain. Many of these selected suppliers were the higher risk SME's who are not reporting entities under the Act. Our response rate was approximately 25% and new questionnaires will be issued to other existing suppliers when their contracts come up for renewal and to any new suppliers we on-board. No questionnaire responses raised any concerns about actual or potential modern slavery practices. 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>Training and Education</p> 	<p>REMONDIS has embedded within our business internal modern slavery awareness and training during the Reporting Period. We prepared and ran multiple comprehensive and interactive training sessions to all senior management and separately to relevant workers in relation to mitigating modern slavery risks and informing them about reporting processes. REMONDIS will continue to develop and provide training and education to management and relevant teams, including through employee newsletters, induction training, and refresher training. 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>Reporting Processes</p> 	<p>During the Reporting Period, REMONDIS received no reports of modern slavery practices or instances under any of our reporting methods. 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 & Safety team, a REMONDIS manager, or general manager, a REMONDIS director or report in accordance with our Whistleblower Protection Policy (also set out in the Supplier Code of Conduct), which provides details for both internal and external reporting mechanisms.</p>

Actions	Effectiveness of actions
<p>Policy Framework</p> 	<p>REMONDIS developed and implemented the following policies:</p> <ul style="list-style-type: none"> ■ Anti-Slavery Policy – provides the policy framework for identifying, assessing, addressing, minimising and mitigating modern slavery risks; ■ 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; and ■ Sustainability Strategy 2021 – sets out our objectives and targets for 2021 across the environment, social and governance aspects of our business including SGD 5.1 and 8.7 alignment with the release of our first Modern Slavery Statement 2020. <p>Other supplemental policies that preceded the Reporting Period include:</p> <ul style="list-style-type: none"> ■ Whistleblower Protection Policy – outlining the internal and external reporting processes for any unacceptable conduct, including modern slavery practices; and ■ REMONDIS Australia Code of Conduct & 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.
<p>Service and Supplier Contracts</p> 	<p>REMONDIS reviewed and updated its standard contracts (including all service, supplier and consultancy agreements) to include a modern slavery provision and a contractual obligation to comply with our Supplier Code of Conduct. This was an important step to embed our contractual right to take corrective actions (or worse case terminate agreements) with service providers or suppliers who are found to be engaging (directly or indirectly) in modern slavery practices. 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 met our expectations as a condition of conducting business with us.</p>

Plans for 2022

Area	Plans
Website Update	Our remondis-australia.com.au website has recently been redeveloped and now includes a public link to our modern slavery and corporate & social responsibility initiatives for 2022. REMONDIS continues to respond to modern slavery enquiries from our contractual counterparties, customers or media on our various platforms (including social media).
Due Diligence	REMONDIS will be undergoing continuous improvement of our due diligence analysis and monitoring processes for existing and new suppliers. We will also evaluate and implement an action plan for reviewing the onboarded suppliers and contractors arising from our 2022 acquisitions across three sites nationally.
Policies	We are updating our procurement policy which will aid in the selection process for new suppliers and raise the bar in aligning our suppliers and contractors with our modern slavery commitments. As part of the positive feedback received from our customers, we are updating our existing Supplier of Code of Conduct to ensure that the same internal and external reporting channels available to our workers, are also available to our suppliers.
Training and Education	Ongoing training and internal awareness for our business will continue to be embedded, especially for new workers. We will also be requiring our business partners to provide training to their workers, suppliers and providers, or otherwise consider rolling out tailored modern slavery training to our interested suppliers.
Alignment with Sustainability Reporting	In 2022, REMONDIS published its first Sustainability Report 2021, setting out our objectives/performance in 2021 and targets for 2022 across the environment, social and governance aspects of our business. REMONDIS' approach to its sustainability goals remain linked to the United Nations' Sustainability Development Goals (SDGs) specifically SDG 5.1, 5.2 and 8.7 as relevant to modern slavery practices.
Modern Slavery Working Group	Our Modern Slavery Working Group will continue to meet to ensure our action plan milestones are achieved. We will continue working with our relevant business units, procurement specialists and suppliers in order to assess the effective of our procurement processes, and will work with each of them to develop new ways to address our modern slavery risks. We will also be considering suitable opportunities to work with our overseas suppliers and community organisations given that restrictions for travel have now eased.
Contracts	We will continue to update and revise our contractual provisions, as required from time to time in order to tighten expectations and obligations on our suppliers.





WORKING FOR THE FUTURE

REMONDIS is one of the world's largest recycling, service and water companies. The group has branches and associated businesses in more than 30 countries across Europe, Africa, Asia and Australia. With over 40,000 employees, the group serves around 30 million people as well as many thousands of companies. The highest levels of quality. Working for the future.