

Modern Slavery Statement 2023

Waste Services Group Pty Ltd

ACN 655 019 408



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INTRODUCTION

This statement covers the activities of the Waste Services Group Pty Ltd, ABN 37 655 19 408 ('Waste Services Group' herein), and its controlled entities to understand and implement actions to minimise the risk of modern slavery in its operations and supply chain.

The purpose of this statement is to outline the Group's approach to ensuring that the Waste Services Group has a robust framework and processes in place to minimise the risk of modern slavery in its business operations and supply chains.

The Waste Services Group recognises that 'modern slavery' can occur in many forms, as defined in the Modern Slavery Act. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

The Waste Services Group is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across the Group. The Group does not tolerate any forms of slavery in any of its related business entities or supply chain.

OUR BUSINESS

The Waste Services Group was established in 2016 to provide total waste management solutions and services to all commercial and industrial industries Australia-wide.

The Waste Services Group key operating entities are identified in the 'Structure, Operations & Supply Chain' section of this Statement.

Through the acquisition of the different key operating entities, the Group has developed a structure and the expertise which enables the provision of waste collection functions spanning across total waste management solutions, encompassing collection and transportation of waste, consultancy, comprehensive waste account management and sustainability.

The Group also provides alternative solutions from traditional waste companies by acting on behalf of its customers in a management capacity by procuring (subcontracting) specialist waste providers to facilitate the most suitable waste management solutions whilst working closely with key stakeholders and suppliers and consolidating customer waste needs under a single umbrella.

STRUCTURE, OPERATIONS & SUPPLY CHAIN

For the purposes of this Statement, the Group's key operating entities and the associated supply chains are as follows:

RELATED COMPANIES	OPERATIONS	SUPPLY CHAIN
 <p>The Wasteflex Unit Trust (T/A Wasteflex Pty Ltd) ABN 60 489 235 807</p>	<ul style="list-style-type: none"> ✓ Provides national waste services and account management for all waste streams including General Waste, Recycled Waste, Prescribed Industrial Waste, Clinical and Other Specialised Waste, Bio-security Waste, etc. ✓ National account management services based out of Melbourne, Sydney, Perth and Brisbane. ✓ Call centre operations based out of Melbourne. ✓ Wasteflex does not own or operate waste collection vehicles, plant, equipment or disposal facilities. 	<ul style="list-style-type: none"> ✓ Australian based contracted waste collection entities who provide services to Wasteflex customers Australia-wide. ✓ Waste management consumables (e.g. clinical waste bin liners) sourced within Australia. ✓ Office consumables, uniform and PPE supplies and promotional merchandise sourced from Australian based suppliers, some may be manufactured overseas. ✓ Technology (hardware, software and cloud services), sourced locally, manufactured overseas. ✓ Cleaning services sourced locally.
 <p>Premier Waste Management Pty Ltd ABN 90 124 936 616</p>	<ul style="list-style-type: none"> ✓ Provides physical collection of customer waste streams throughout the Melbourne metropolitan region. ✓ Premier Waste owns and operates waste collection vehicles, plant and equipment. ✓ Workshop facilities for minor vehicle maintenance. ✓ Call centre operations based out of Melbourne. ✓ Waste bin prep workshop. 	<ul style="list-style-type: none"> ✓ Automotive requirements (vehicles, bodies, tyres, fuel, spare parts), sourced from Australian based tier 1 suppliers and distributors, and may be manufactured from various overseas locations. ✓ Automotive specialists including fitters and mechanics sourced locally. ✓ Bin and container manufacturers based in Australia. ✓ Office, Technology (hardware, software and cloud services), uniform and PPE supplies sourced locally, some manufactured overseas. ✓ Cleaning services sourced locally.
 <p>Superior Waste Management Unit Trust (T/A Superior Waste Management Pty Ltd) ABN 55 341 098 103</p>	<ul style="list-style-type: none"> ✓ Provides physical collection of customer waste streams throughout the Melbourne metropolitan region. ✓ Superior Waste owns and operates waste collection vehicles, plant and equipment. ✓ Workshop facilities for minor vehicle maintenance. ✓ Call centre operations based out of Melbourne. 	<ul style="list-style-type: none"> ✓ Automotive requirements (vehicles, bodies, tyres, fuel, spare parts), sourced from Australian based tier 1 suppliers and distributors, and may be manufactured from various overseas locations. ✓ Automotive specialists including fitters and mechanics sourced locally. ✓ Bin and container manufacturers based in Australia. ✓ Office, Technology (hardware, software and cloud services), uniform and PPE supplies sourced locally, some manufactured overseas. ✓ Cleaning services sourced locally.

RELATED COMPANIES	OPERATIONS	SUPPLY CHAIN
<p>MGPG Consulting Pty Ltd ABN 81 157 703 010</p>	<ul style="list-style-type: none"> ✓ Provides waste services and account management for all waste streams including General Waste, Recycled Waste, Prescribed Industrial Waste, Clinical and Other Specialised Waste, Bio-security Waste, etc throughout New South Wales. ✓ Account management services based out of Sydney. ✓ Call centre operations based out of Melbourne. ✓ MGPG Consulting Pty Ltd does not own or operate waste collection vehicles, plant, equipment or disposal facilities. 	<ul style="list-style-type: none"> ✓ Australian based contracted waste collection entities who provide services to Wasteflex customers Australia-wide. ✓ Waste management consumables (e.g. clinical waste bin liners) sourced within Australia. ✓ Office consumables, uniform and PPE supplies and promotional merchandise sourced from Australian based suppliers, some may be manufactured overseas. ✓ Technology (hardware, software and cloud services), sourced locally, manufactured overseas. ✓ Cleaning services sourced locally.
 <p>The Trustee for WASTEFREE UNIT TRUST T/A Wastefree Australia Pty Ltd ABN 80 275 210 542</p>	<ul style="list-style-type: none"> ✓ Provides physical collection of customer waste streams throughout the Sydney metropolitan region. ✓ Wastefree owns and operates waste collection vehicles, plant and equipment. ✓ Workshop facilities for vehicle maintenance. ✓ Call centre operations based out of Sydney. ✓ Waste bin prep workshop 	<ul style="list-style-type: none"> ✓ Automotive requirements (vehicles, bodies, tyres, fuel, spare parts), sourced from Australian based tier 1 suppliers and distributors, and may be manufactured from various overseas locations. ✓ Automotive specialists including fitters and mechanics sourced locally. ✓ Bin and container manufacturer's based in Australia. ✓ Office, Technology (hardware, software and cloud services), uniform and PPE supplies sourced locally, some manufactured overseas. ✓ Cleaning services sourced locally.
 <p>The Trustee for CSA Specialised Services UNIT TRUST T/A CSA Specialised Services Pty Ltd ABN 11 757 908 807</p>	<ul style="list-style-type: none"> ✓ Provides waste removal services of customer liquid waste, drain cleaning services, non-destructive digging and removal of waste by-product, emergency spill response and cleanup, CCTV services inspection and service location. ✓ CSA Specialised Services owns and operates specialised service and liquid collection vehicles including combination, eductor and hydro excavation vehicles. ✓ Workshop facilities for vehicle maintenance. ✓ Operational and call centre team operating out of Melbourne and Queensland depots. 	<ul style="list-style-type: none"> ✓ Automotive requirements (vehicles, bodies, tyres, fuel, spare parts), sourced from Australian based tier 1 suppliers and distributors, and may be manufactured from various overseas locations. ✓ Associated equipment, plant and machinery including technology, some sourced and manufactured overseas. ✓ Automotive specialists including fitters and mechanics sourced locally. ✓ Office, Technology (hardware, software and cloud services), uniform and PPE supplies sourced locally, some manufactured overseas. ✓ Cleaning services sourced locally.

RELATED COMPANIES	OPERATIONS	SUPPLY CHAIN
 <p>Argus Waste Recycling Pty Ltd T/A Augus Waste Recycling ABN 86 630 863 419</p>	<ul style="list-style-type: none"> ✓ Provides liquid waste processing and recycling plant that processes industrial liquid waste, recovering material for re-use and recycle, thereby diverting it from landfill or water treatment plants. ✓ Argus Recycling is operated by CSA Specialised Services. ✓ Plant facilities include holding tanks, solid recovery machinery, and associated pumps and pipework. ✓ Offices, workshop for facilities maintenance and associated machinery. 	<ul style="list-style-type: none"> ✓ Recycling plant equipment such as pipe work, pumps, machinery, filters, structural steel, chemicals, weighbridge equipment, and associated parts, which may be sourced from overseas via primary Australian based suppliers. ✓ Automotive requirements (vehicles, tyres, fuel, spare parts), sourced locally, some may be manufactured overseas. ✓ Maintenance specialists including fitters, mechanics, electricians and engineers sourced locally. ✓ Office, Technology (hardware, software and cloud services), uniform and PPE supplies sourced locally, some manufactured overseas. ✓ Cleaning services sourced locally.
 <p>APC Waste Consulting T/A A. Prince Consulting Pty Ltd ABN 96 077 504 226</p>	<ul style="list-style-type: none"> ✓ Provides waste management consultancy services to Government and non-Government entities. ✓ APC Waste Consulting provide waste auditing, waste stream mapping, strategy and plans, resource management strategies, compliance and training and education development and facilitation. ✓ NSW based, with nationwide services. ✓ APC Waste Consulting does not own or operate waste collection vehicles, plant, equipment or disposal facilities. 	<ul style="list-style-type: none"> ✓ Waste management consumables (e.g. waste bin liners, scales and associated auditing and sorting equipment) sourced within Australia. ✓ Office consumables, uniform and PPE supplies and promotional merchandise sourced from Australian based suppliers, some may be manufactured overseas. ✓ Technology (hardware, software and cloud services), sourced locally, some may be manufactured overseas. ✓ Cleaning services sourced locally.

POLICIES & PROCEDURES

Waste Services Group have formal policies in place that are intended to promote ethical and legally compliant business conduct.

All teams that procure for the Waste Services Group have a number of risk mitigation and procurement processes in place including:

- ✓ Code of Conduct Policy;
- ✓ Whistle Blower Policy;
- ✓ Social Responsibility Policy;
- ✓ Supplier Code of Conduct Policy (draft);
- ✓ Sustainable Procurement Policy;
- ✓ Contractor and Supplier management procedures;
- ✓ Contractor Management compliance portal;
- ✓ Delegation of Authority;
- ✓ Remuneration compliance audit;
- ✓ Enterprise Risk Register;

All the above policies and associated procedural controls will be reviewed to ensure that the Group have robust processes in place to minimise the risk of modern slavery in its operations and supply chain.

POTENTIAL RISKS OF MODERN SLAVERY

The Waste Services Group has been able to identify areas with 'NO' or 'LOW' risk in its operational activities that are directly undertaken by employees and covered by the internal processes of the various operational entities (refer to the Structure, Operations and Supply Chain above).

The Group will implement future processes to identify potential risks associated with supply chains including a supply chain risk assessment, modern slavery due diligence questionnaires and other contractual requirements.

ADDRESSING MODERN SLAVERY RISKS

The Group requires its suppliers and contractors to abide by the requirements of the Modern Slavery Act 2018 in accordance with the Waste Services Group Terms and Conditions.

The Group engages with suppliers and contractors to promote and support anti-slavery

practices throughout the individual operating entities' supply chains and other contracted entities.

The Group is committed to introducing anti-slavery obligations in all supplier and other contracted entity contracts.

As part of their contractual obligations, Suppliers and Contractors will agree to provide information (as required) so the Group can gauge the supplier's and contractor's ongoing commitment to eradicating modern slavery within their own business and those of their own suppliers and contractors.

Waste Services Group Terms and Conditions are required to be agreed upon in the initial contractor and supplier pre-qualification process that is submitted via the Group's online contractor management portal, Rapid Global.

All suppliers and contractors are required to comply with the Waste Services Group Terms and Conditions of engagement and other policies and standards on human rights, ethical business practices, safety and environment.

The Group Health, Safety, Environment and Quality (HSEQ) departments review all submissions for compliance and liaise with key team members to be able to verify documents submitted. All contractor companies must be compliant prior to being utilised by the Group.

In 2020, the Waste Services Group held its initial Modern Slavery awareness and risk mitigation session with key stakeholders. The session reviewed the reporting obligations and mapped modern slavery risks to its operation including the following key actions:

- ✓ Developing Modern Slavery Policies relevant to the key operating entities;
- ✓ Modifying contractor and supplier pre-qualification processes;
- ✓ Updating the Waste Services Group Terms and Conditions to include compliance requirements under the Modern Slavery Act 2018; and
- ✓ Identifying and rolling out Modern Slavery compliance training to the executive team in the first instance.

Further work has been conducted in reviewing and updating policies and processes to mitigate risk within the business, referred above.

FUTURE COMMITMENT

The Group is implementing the following to further improve its knowledge of any modern slavery risk across its business and supply chains, including;

- ✓ Conducting a risk assessment of its supply chain to identify higher risk supply categories, based on geography and industry sector;
- ✓ Undertaking a Modern Slavery survey of those higher risk category suppliers to understand their control measures in place to minimise this risk;
- ✓ Updating the Group's contractor compliance audit template to include assessment of control performance and risk factors;

- ✓ Update the Group's contractor management compliance portal questionnaire to include aspects of risk mitigation of modern slavery;
- ✓ Measure and monitor Contractor management portal compliance;
- ✓ Launch the Group's Supplier Code of Conduct Policy, and
- ✓ Undertake the above on a regular basis (at a minimum 3 yearly).

APPENDIX 1: COMPANY DIRECTORY & SIGNATORY

Registered Office

10-12 Graham Daff Boulevard
BRAESIDE
VICTORIA 3195

Waste Services Group Pty Ltd

Matt Tamplin
Chief Executive Officer (CEO)

Sean Hepburn
Group HSQ Manager

Nadine Ponomarenko
Group ESG Manager

This Statement was approved by the Board of Waste Services Group Pty Ltd

Matt Tamplin
Chief Executive Officer (CEO)

Waste Services Group Pty Ltd

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