

Modern Slavery Policy

1. Policy Application

- 1.1 This Policy applies to all subsidiaries of the Waste Services Group (the Company herein) including Premier Waste, Superior Waste, Wastefree, Wasteflex and APC Consulting.
- 1.2 This Policy applies to all persons working for or on behalf of, or providing services in any capacity including Suppliers, Contractors, Employers, Directors, Officers, Consultants and any other third-party representatives.
- 1.3 The Company is committed to limiting the risk of modern slavery within its own business, within its supply chains or through any other business relationship.
- 1.4 The Company shall ensure that all who have, or seek, a relationship with the Company will be made aware of this Policy and their obligation to act in a way that is consistent with its values.
- 1.5 The Company will only do business with Suppliers, Contractors, Consultants and any other third-party representatives who fully comply with this Policy, or those who are taking verifiable steps towards compliance.

2. The Company's Response to Modern Slavery

- 2.1 The Company operates with integrity and conducts business in a way which promotes and supports Human Rights obligations within the Company and its supply chain.
- 2.2 The Company abides by the requirement of the Commonwealth Modern Slavery Act 2018.
- 2.3 All employment with the Company is voluntary.
- 2.4 The Company does not use or condone, child or forced labour in any of its operations or premises and works to ensure these practices are not present in its workforce or supply chain.
- 2.5 The Company does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse or involuntary servitude.
- 2.6 The Company abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- 2.7 Investigating all valid claims of modern slavery in the business or within the Company's supply chains and resolving issues in-line with the values expressed in this Policy.
- 2.8 Providing information with the aim of creating awareness for all employees, suppliers and contractors regarding this Policy and what actions an employee or supplier can take if they have a concern in relation to modern slavery, and conducting due diligence practices for new and existing contractors and suppliers;

- 2.9 The Company conducts risk assessments to determine which parts of the business and supply chains are most at risk from modern slavery to ensure focus on those areas as required.

3. The Company's Supply Chain

- 3.1 The Company requires its Suppliers and Contractors to abide by the requirements of the Modern Slavery Act 2018.
- 3.2 The Company engages with Suppliers and Contractors to promote and support anti-slavery practices throughout the Company's supply chain and other contracted entities.
- 3.3 The Company is committed to introducing anti-slavery obligations in all Supplier and other Contracted Entity contracts.
- 3.4 As part of the contractual obligations, Suppliers and Contractors will agree to provide information (as required) so the Company can gauge the Suppliers and Contractor's ongoing commitment to eradicating modern slavery within their own business and those of their suppliers and contractors.

4. Non-Compliance with this Policy

- 4.1 Any breach of this Policy will be taken seriously and dealt with on a case-by-case basis.
- 4.2 A breach of this policy by an Employee may lead to disciplinary action being taken in accordance with the Company's disciplinary process.
- 4.3 Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to the Company's disciplinary procedure.
- 4.4 A breach of this Policy by Supplier or Contractor will also be dealt with on a case-by-case basis.
- 4.5 Depending on the behaviour, the Company may choose to adopt a zero-tolerance stance towards the Supplier or Contractors behaviour and look at methods of preventing further engagement with the Supplier or Contractor or may decide to work with the Supplier or Contractor, so they become compliant with this policy.

The Modern Slavery Act (Comm) 2018

- 5.1 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 or services and the worst forms of child labour. The worst forms of child labour mean situations where children are subject to slavery or similar practices or engage in hazardous work.

Matt Tamplin

Chief Executive Officer

Waste Services Group

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