

Modern Slavery Statement 2025

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. Oversight and management of risks associated with modern slavery is managed at the Group level, by various members of the Executive Team, including the Chief Executive Officer, Group HSQ Manager, and Group ESG Manager and the Executive General Managers of the various operations, with ultimate oversight by the Group Board; this incorporates all owned and controlled entities.

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 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 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.

More recently, the Group has embraced the importance of sustainability and have a clear commitment to being an ESG leader in the Australian waste industry. The Group is well placed to do this through its unique combination of sustainability-focused services.

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 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 supply companies. ✓ 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>  <p>AWR (T/A Australian Waste Recovery)</p>	<ul style="list-style-type: none"> ✓ Provides physical collection of customer waste streams throughout the Melbourne and Brisbane metropolitan region. ✓ Premier Waste owns and operates waste collection vehicles, plant, and equipment, and provides waste recycling and resource separation and recovery services located in Dandenong Sth transfer station. ✓ Workshop facilities for minor vehicle maintenance and waste bin prep workshop / yard. ✓ Call centre operations based out of Melbourne & Brisbane. ✓ The transfer station site accepts, sorts and then transfers via road, the sorted waste to various recycling and landfill sites. It operates material handling equipment including frontend loaders, excavators, semi-trailer and rigid fleet of trucks, a timber shredder unit etc. 	<ul style="list-style-type: none"> ✓ Automotive requirements (vehicles, material handling equipment, 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>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.
 <p>Paper Resource (T/A Paper Resource Pty Ltd) ABN 78 624 297 534</p>	<ul style="list-style-type: none"> ✓ Provides physical plant and equipment to sort and bale paper and cardboard for on selling and distribution to recycling facilities. ✓ Paper Resource is part of the NSW Solids Collections business that includes Wastefree. ✓ The facility includes warehousing, 2 x bailing machines and associated shredders, conveyor and sorting lines. ✓ Material handling equipment includes forklifts and frontend loaders. ✓ Maintenance workshop, offices and its associated equipment are included onsite. 	<ul style="list-style-type: none"> ✓ Bailing machinery and equipment including electronics are sourced from European based manufacturers and suppliers. ✓ Other plant equipment such as filters, structural steel, chemicals, weighbridge equipment, and associated parts, which may be sourced from overseas via primary Australian based suppliers. ✓ 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>Lombos Exports (T/A Lombos Pty Ltd) ABN 15 166 771 197</p>	<ul style="list-style-type: none"> ✓ Provides supply chain management for the on selling of paper and cardboard into the recycling market both domestically and internationally. ✓ The business is the selling arm of PR and provides purely administrative services. ✓ Office based management and call centre. ✓ Lombos Exports does not own or operate any plant, equipment or vehicles. 	<ul style="list-style-type: none"> ✓ 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.

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 based companies. ✓ 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 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>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 services to construction, heavy industry, water authorities and municipal and government organisations, of liquid waste removal, drain cleaning, non-destructive digging and removal of waste by-product, emergency spill response and cleanup, High Pressure Water Jetting, demolition, general civil works, CCTV services inspection and service location, through Melbourne and Brisbane. ✓ CSA Specialised Services owns and operates specialised service and liquid collection vehicles including eductor and hydro excavation vehicles, HPW jetting, Industrial services. ✓ Workshop or 3rd party facilities for vehicle maintenance. ✓ Operational and call centre team operating out of Melbourne and Brisbane 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. ✓ Specialised and associated equipment, plant and machinery including technology, are 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 recycling, thereby diverting it from landfill or water based liquid disposal to the environment. ✓ Argus Recycling is operated by CSA Specialised Services. ✓ Plant facilities include holding tanks, solid recovery machinery, associated pumps and pipework, civil material handling machinery, ✓ 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. ✓ Specialised and associated equipment, plant and machinery including technology, are sourced and 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>T/A Beralon Pty Ltd Chemical Cleaning Services ABN 31 619 185 429</p>	<ul style="list-style-type: none"> ✓ Provides chemical cleaning & descaling of industrial equipment drain cleaning services, non-destructive digging and removal of waste by-product, emergency spill response and cleanup, Industrial services including HP water jetting and washdown. ✓ Beralon Pty Ltd is operated by CSA Specialised Services. ✓ Owns and operates specialised service and liquid collection vehicles including combination, educting, vacuum loading and HPW vehicles and units. ✓ Workshop facilities for vehicle maintenance are conducted by 3rd parties ✓ Based in Sydney and supplying chemical cleaning and industrial services to clients in the Sydney, Newcastle and Wollongong areas. 	<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. ✓ Specialised and associated equipment, plant and machinery including technology, are 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, with many 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.

Waste Services Group have a number of risk mitigation and procurement processes in place including:

- ✓ Employee Code of Conduct Policy;
- ✓ Whistle Blower Policy;
- ✓ Social Responsibility Policy;
- ✓ Supplier Code of Conduct Policy;
- ✓ Sustainable Procurement Policy;
- ✓ Contractor and Supplier management procedures;
- ✓ Contractor Management compliance portal;
- ✓ Delegation of Authority;
- ✓ Remuneration compliance audit;
- ✓ Enterprise Risk Register;
- ✓ Modern Slavery supplier self-assessment questionnaire; and
- ✓ Desk top supply chain risk assessment.

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. The above policies and procedures are set at the Group level and apply to owned and controlled entities.

A number of policies are available publicly via the WSG website; [Waste Services Group \(WSG\) – Making every day more sustainable](#)

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).

At the Group level, processes to identify potential risks associated with supply chains including a supply chain risk assessment, modern slavery due diligence questionnaires and other contractual requirements are performed, which are reviewed periodically; this incorporates all owned and controlled entities.

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 sub-contractor and other contracted entity contracts. This is detailed in WSG's supplier Code of Conduct, published on WSG website.

Management of the risks of modern slavery are performed at the Group level, including contractor compliance management, review of suppliers across the Group to determine supplier risk profiles, and requesting suppliers identified with a higher risk profile to complete a Modern Slavery self-assessment questionnaire. The nature of the owned and controlled entities are sufficiently similar that they have common modern slavery risks and suppliers, such that management at the Group level is appropriate, while accommodating any various factors at an entity level.

As part of their contractual obligations, 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 within controlled entities to verify documents submitted. All contractor companies must be compliant prior to being utilised by the Group.

Since 2020, the Waste Services Group has continued to grow and refine its Modern Slavery awareness and risk mitigation processes, and its internal and external stakeholder engagement, including the following key actions:

- ✓ Reviewing 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;

- ✓ Identifying and rolling out Modern Slavery compliance training to the executive team in the first instance;
- ✓ Revising WSG operational modern slavery risk profile; and
- ✓ Continuing to support our suppliers and customers in Modern Slavery reporting obligations.

Further work has been conducted in 2025 that included the following;

- ✓ Further extending the risk assessment of the supply chain to identify higher risk supply categories, based on geography and industry sector across newly acquired entities;
- ✓ Undertaking a Modern Slavery survey of those higher risk category suppliers to understand their control measures in place to minimise this risk, including new suppliers;
- ✓ Conducting site and face to face auditing of sub-contractor and post collection service providers based on a standard audit template which includes HSE and modern slavery compliance criteria;
- ✓ Update the Group's contractor management compliance portal questionnaire to include aspects of risk mitigation of modern slavery;
- ✓ Continually monitor Contractor management portal compliance;
- ✓ Attain various certifications and accreditations via WSG's business units such as CM3, Avetta, EcoVadis and GECA that promote sustainable and ethical business practices; and
- ✓ Partner with charities that promote ethical and sustainability practices such as Pancare Foundation cancer research.

FUTURE COMMITMENTS

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

- ✓ Undertake the above on a regular basis (at a minimum 3 yearly).
- ✓ Engage with suppliers and review any information or reports of supplier non-compliance.
- ✓ Continue to promote ethical business practices via supplier questionnaires and the Group's website.
- ✓ Participate in supplier and customer forums to continually improve the Group's capability.
- ✓ Centralisation of the management of key procurement processes.
- ✓ Enter into over-arching supply contracts with our largest sub-contractors and suppliers.
- ✓ Further attain where practicable partnerships with ethical and sustainability industry bodies standards and certifications.

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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