



MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2022-2023

WA RETURN RECYCLE RENEW LIMITED

Contents

| | |
|---|---|
| Reporting criteria | 3 |
| Introduction | 3 |
| Our operations | 4 |
| Our reach | 5 |
| Our risks..... | 5 |
| Review, reflection, and future commitments..... | 7 |
| Approval..... | 8 |

Reporting criteria

| Modern Slavery Act Reporting Criteria | Relevant Section |
|--|--|
| a) Identify the reporting entity. | Introduction, pg 3 |
| b) Describe the reporting entity's structure, operations and supply chains. | Our operations, pg 4 Our reach, pg 5 |
| c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls. | Our operations, pg 4 Our reach, pg 5 Our risks, pg 5 |
| d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes. | Our risks, pg 5 |
| e) Describe how the reporting entity assesses the effectiveness of these actions. | Review, reflection and future commitments, pg 7 & 8 |
| f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls | Do not own or control any other entities. |
| g) Any other information that the reporting entity, or the entity giving the statement, considers relevant | Nil |

Introduction

Western Australia Return Recycle Renew Limited (WARRRL) is a not-for-profit organisation appointed by the State Government of Western Australia to coordinate WA's container deposit scheme (CDS), Containers for Change.

In this FY22-23 Modern Slavery Statement:

The term 'modern slavery' is 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 dangerous or substandard working conditions which can be inclusive of underpayment of workers, working excessive hours and/or unsafe workplaces. However, it should be noted that these practices are also illegal and harmful and may be present in some situations of modern slavery. These practices may also escalate into modern slavery if not addressed. WARRRL condemns these practices, and also acknowledge that modern slavery does not occur in isolation. It forms part of other complex challenges such as forms of discrimination and low wages.

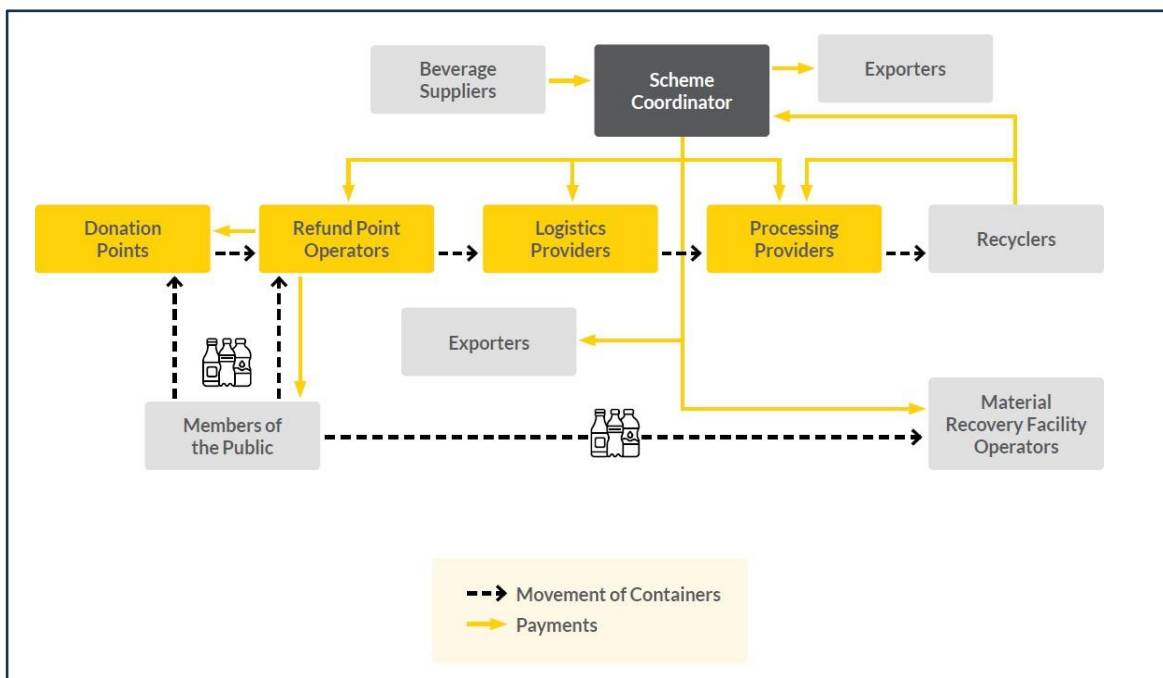
As such, WARRRL recognises that modern slavery is a worldwide issue, recognising that to address the challenges of modern slavery, collaboration with business partners is needed. WARRRL are committed to ensuring when developing policies, as far as reasonably practicable, risk mitigation and compliance with regulatory requirements around modern slavery is considered.

Our operations

WARRRL is responsible for the governance and administration of the WA Container Deposit Scheme on a day-to-day basis. To support the delivery of this Scheme Coordinator function, WARRRL has engaged several third parties to leverage specialist expertise, external efficiencies and to support the Board and Executive management in meeting obligations.

To ensure optimal outcomes across the entire network there are several functions, including:

- overseeing the refund point collection network to ensure Scheme objectives are met consistent with their obligations under the refund point agreement;
- managing the transportation, processing, and recycling of Scheme materials post redemption at refund points as well as management of the material recycling facility stream for eligible containers consistent with Scheme objectives;
- overseeing and ensuring product stewardship for the Scheme, including risk management oversight and compliance; and
- auditing Scheme participants, beverage suppliers, RPOs, material recovery facilities, exporters and other contracted parties.



Our reach

Although WARRRL is a relatively small entity with only approximately 50 employees, WARRRL has a broad footprint throughout Western Australia with a diverse array of business partners. These partnerships range from large corporations to small sole proprietor businesses and not for profit entities.

WARRRL recognise the risk of modern slavery can be found in any size entity and have undertaken steps to understand high risk businesses within the first tier within their supply chain.

The composition of many businesses WARRRL conducts business with are WA sole owned and operated. This provides some mitigation against the presence of modern slavery as their footprint does not extend overseas into identified at risk countries and they do not have extensive supply chains, additionally these organisations are subject to Australian legislation. WARRRL are, however, committed to further understanding the risks of modern slavery within operations and tier two supply chains.

Our risks

WARRRL have an integrated and comprehensive approach to governance, risk, and compliance obligations, underpinned by a strong commitment to continuous improvement.

Utilising a dynamic online risk management software, WARRRL mitigates risks through a range of Policy levers, training and promotion of Whistleblowing services.

Throughout the financial year, WARRRL have continued the risk assessment and management journey with respect to modern slavery. When considering all forms of modern slavery, WARRRL understands that there is the potential for vulnerable populations to be taken advantage of due to the nature of the services provided within the Scheme, these populations include those from low socio-economic areas or geographical regions where Containers for Change has refund processing facilities located. WARRRL has identified the following categories of risk and have included the current control measures in place to lower the risk of exploitation regarding modern slavery.

| Type of Exploitation | Risk Area | Risk Level | Current Mitigation Measures |
|---|--|------------|--|
| Trafficking in persons Slavery Servitude Forced Labour | <ul style="list-style-type: none"> Poor unsafe working conditions Excessive hours of work Restricted movement Substandard accommodation Withholding identity and travel documents | Low | <ul style="list-style-type: none"> Modern Awards in place Individuals are free to apply for work, free to turn down work and offer to work and free to leave work at any time Sound WHS system and practices in place Identification papers not retained |

| Type of Exploitation | Risk Area | Risk Level | Current Mitigation Measures |
|--|--|------------|--|
| Debt Bondage | <ul style="list-style-type: none"> • Unauthorised payroll deductions, fees or debt recovery • Underpayment of wages | Low | <ul style="list-style-type: none"> • We will not charge any fees to individuals for the sourcing of their employment they are offered |
| The worst forms of child labour | <ul style="list-style-type: none"> • Underage employees | Low | <ul style="list-style-type: none"> • Age of employee is verified via photo ID prior to commencement of work |
| Deceptive recruiting for labour services | <ul style="list-style-type: none"> • Deceptive or coercive recruiting • High risk industry plus migrant or disadvantaged workers | Low | <ul style="list-style-type: none"> • Every worker is provided with a copy of the terms and conditions of employment, which is inclusive of rates of pay, hours worked and entitlements. |

Utilising resources such as ‘Tackling Modern Slavery in Supply Chains Guide 1.0’, WARRRL has designated the following risk profiles.



From this profiling there are minimal high-risk business that WARRRL engage with. Those that are in this category already complete mandatory modern slavery reporting in line with the legislative requirements set out by the Australian Government. WARRRL is committed to continuous improvement and to learn from the assessments that these organisations already conducted.

WARRRL has conducted a risk review of contracts and ensured that all commercial agreements have a clause to mitigate modern slavery and place obligations upon those businesses to act ethically and responsibly. Below is a summary of the agreements that exist with WARRRL, of which all are standard template agreements that include a clause relating to the mitigation, identification, and reporting of modern slavery. A copy of these standard agreements can be found on WARRRL’s website at <https://warrl.com.au/reporting-agreements/> and a breakdown of those agreement and risk ratings has been provided below.

| WARRRL | Agreement Type | Number of Agreements | Section of Agreement | Risk of Modern Slavery |
|--------|------------------------------|----------------------|----------------------|------------------------|
| | First Responsible Suppliers | 643 agreements | Section 8 | Medium |
| | Refund Point Operators | 74 Agreements | Section 14.4 | Medium / Low risk |
| | Logistics Providers | 7 Agreements | Section 13 | Low Risk |
| | Processors | 4 agreements | Section 16 | Low Risk |
| | Material Recovery Facilities | 7 Agreements | Section 15 | Low Risk |
| | Recyclers | 31 Agreements | Section 9 | Medium Risk |
| | Exporters | 14 agreements | Section 15 | Medium Risk |

Review, reflection, and future commitments

It is noted that at the time of this submission, WARRRL has not identified any instance of Modern Slavery in connection to the organisation or with respect to the Scheme, however are committed to continuing to refine the way in which risks of modern slavery are assessed.

From the learnings to date, it is understood that WARRRL can still do more to assist with ensuring that modern slavery is not occurring within supply chains.

Since the last report, WARRRL has completed the following:

- **Risk Review:** WARRRL have undertaken a comprehensive risk review of Tier 1 suppliers to assess modern slavery exposure and determine the efficacy of the controls that are in place, this was conducted by an independent third party - iPro.

Key outcomes of this included:

- This work informed decision making to review the risk profile of first responsible suppliers, adjusting them from medium / high rated to medium rated
- This work informed decision making to review the risk profile of refund point operators, adjusting them from low / medium rated to low rated.
- Recognition that customised Modern Slavery Training would go far in mitigating potential exposures, along with the creation of standardised policies to supplement this training for suppliers.

- **Refinement of existing audit tools:** WARRRL have a deep reach with a vast majority of Tier 1 suppliers based on the nature of the container deposit scheme and the contractual compliance monitoring regime that has been developed and executed.

The compliance monitoring regime that WARRRL implements for contracted entities includes several types of activities such as site inspections and audits, requests for information and documentary evidence, and enforcement of annual reporting requirements.

WARRRL have improved inspection and auditing tools to enable a deeper dive into modern slavery risks with suppliers on a periodic basis as part of this assurance work. These tools have been expanded with prompt questions and 'flags' for auditors and inspectors to look for.

WARRRL commits to the following actions for FY24:

- Commission the development of accessible training for the Refund Point network on modern slavery, ensuring the Refund Point network are aware of and able to identify, prevent and report occurrences of Modern Slavery;
- Review WARRRL's business continuity plans to ensure suitable measures are in place if modern slavery is detected within WARRRL's supply chain.
- Commission the development of a suite of customised templates for key suppliers to access for download which provides guidance on preventing, detecting and responding to instances of modern slavery within their business.
- Provide a customised template for key suppliers to access for download to enable them to self-assess their modern slavery risks.

Approval

This statement was approved by the Board of Directors for WA Return Recycle Renew Limited on 27 November 2023.



Tim Cusack, Chief Executive Officer: WA Return Recycle Renew Limited