



# MODERN SLAVERY STATEMENT

FY2023-24

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## REPORTING CRITERIA

MODERN SLAVERY ACT REPORTING CRITERIA	RELEVANT SECTION
a. Identify the reporting entity.	<ul style="list-style-type: none"> <li>• Introduction, pg 3</li> </ul>
b. Describe the reporting entity’s structure, operations and supply chains.	<ul style="list-style-type: none"> <li>• Our operations, pg 4</li> <li>• Our reach, pg 5</li> </ul>
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.	<ul style="list-style-type: none"> <li>• Our operations, pg 4</li> <li>• Our reach, pg 5</li> <li>• Our risks, pg 5</li> </ul>
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.	<ul style="list-style-type: none"> <li>• Our risks, pg 5 - 8</li> </ul>
e. Describe how the reporting entity assesses the effectiveness of these actions.	<ul style="list-style-type: none"> <li>• Review, reflection and future commitments, pg 7 -8</li> </ul>
f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	<ul style="list-style-type: none"> <li>• Do not own or control any other entities.</li> </ul>
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	<ul style="list-style-type: none"> <li>• Nil</li> </ul>



## 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 FY23-24 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.

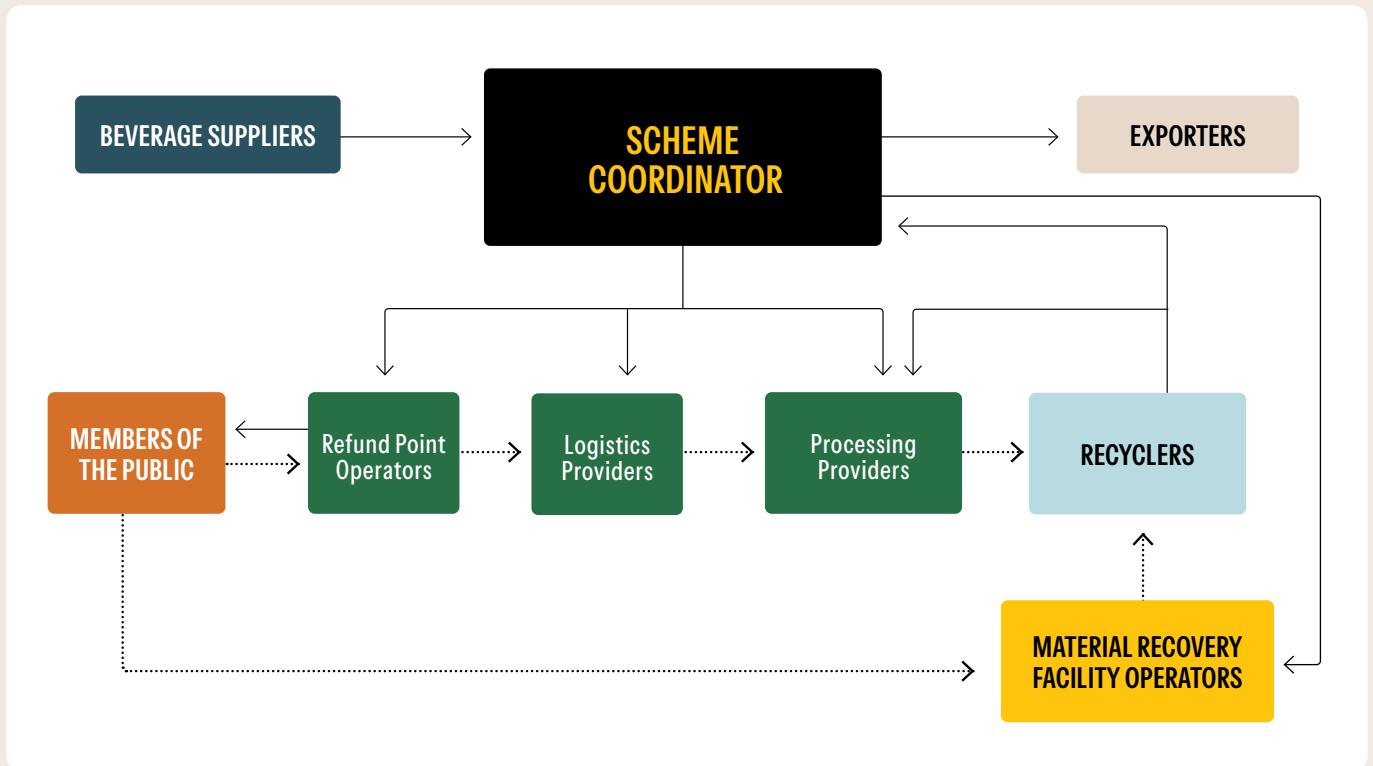
As such, WARRRL recognises that modern slavery is a worldwide issue, and collaboration with business partners is needed to address the challenges of modern slavery. WARRRL are committed to ensuring when developing policies, as far as reasonably practicable, risk mitigation and compliance with regulatory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

# OUR OPERATIONS

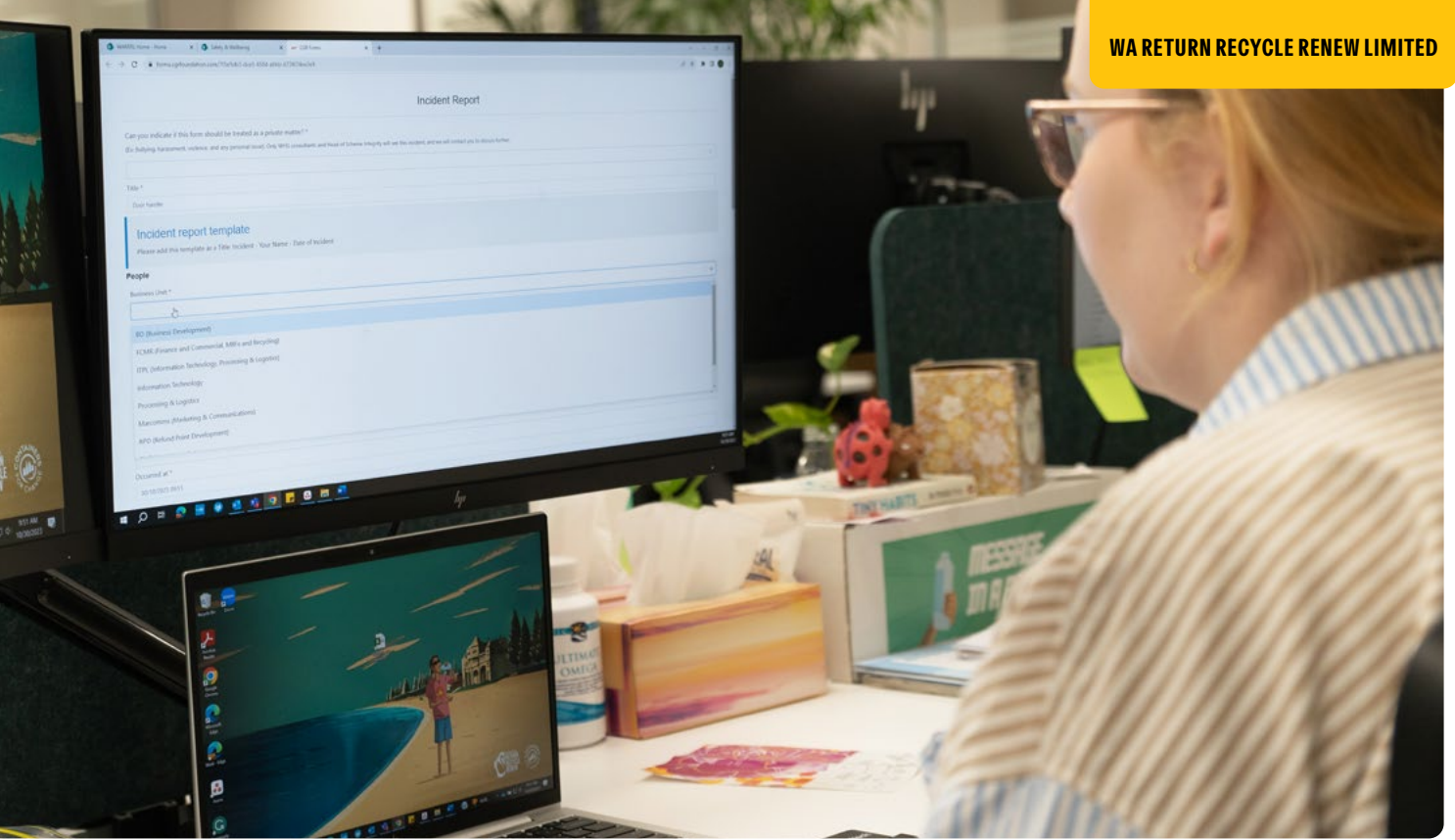
WARRRL is responsible for the governance and administration of the WA Container Deposit Scheme on a day-to-day basis. To support the delivery of this Scheme Coordinator function, WARRRL has engaged several third parties to leverage specialist expertise, external efficiencies and to support the Board 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 approximately 60 employees, it has a broad footprint throughout Western Australia with a diverse array of business partners. These partnerships include both large corporations and small sole proprietorships, as well as not-for-profit entities, many of which now have stabilised and long-term relationships with WARRRL.

WARRRL recognises that the risk of modern slavery can be present in any size entity and has proactively undertaken steps to understand high-risk businesses within the first tier of its supply chain. The majority of the businesses WARRRL engages with are Western Australian-owned and operated.

This stability and localised focus offer some mitigation against the presence of modern slavery, as these businesses' operations do not typically extend into high-risk countries, and they have relatively straightforward supply chains. Additionally, these organisations are subject to Australian legislation, which further supports the mitigation of modern slavery risks.

## OUR RISKS

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

Utilising dynamic online risk management software, WARRRL mitigates risks through a range of policy levers, training and promotion of Speak Up 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 has 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
<b>Trafficking in persons Slavery Servitude Forced Labour</b>	<ul style="list-style-type: none"> <li>• Poor unsafe working conditions</li> <li>• Excessive hours of work</li> <li>• Restricted movement</li> <li>• Substandard accommodation</li> <li>• Withholding identity and travel documents</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Modern Awards in place</li> <li>• Individuals are free to apply for work, free to turn down work and offer to work and free to leave work at any time</li> <li>• Sound WHS system and practices in place</li> <li>• Identification papers not retained</li> </ul>
<b>Debt Bondage</b>	<ul style="list-style-type: none"> <li>• Unauthorised payroll deductions, fees or debt recovery</li> <li>• Underpayment of wages</li> </ul>	Low	<ul style="list-style-type: none"> <li>• We will not charge any fees to individuals for the sourcing of their employment they are offered</li> </ul>
<b>The worst forms of child labour</b>	<ul style="list-style-type: none"> <li>• Underage employees</li> </ul>	Low	<ul style="list-style-type: none"> <li>• Age of employee is verified via photo ID prior to commencement of work</li> </ul>
<b>Deceptive recruiting for labour services</b>	<ul style="list-style-type: none"> <li>• Deceptive or coercive recruiting</li> <li>• High risk industry plus migrant or disadvantaged workers</li> </ul>	Low	<ul style="list-style-type: none"> <li>• 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.</li> </ul>

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

**Low Risk**

- WA Based Operations
- Revenue below \$50M
- Public policy on Modern Slavery

**Medium Risk**

- Australian Based Operations
- Revenue of over \$50M

**High Risk**

- Multi National Operations
- Revenue of over \$100M
- No policy on Modern Slavery
- Negative media relations in regards to previous accusations of Modern Slavery
- Trade products such as IT, garments, fish, cocoa and sugarcane

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 learning from the assessments that these organisations have 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 [warrri.com.au/reporting-agreements](http://warrri.com.au/reporting-agreements) and a breakdown of those agreements and risk ratings has been provided on the following page.

	AGREEMENT TYPE	NUMBER OF AGREEMENTS	SECTION OF AGREEMENT	RISK OF MODERN SLAVERY
<b>WARRRL</b>	First Responsible Suppliers	758 agreements	Section 8	Medium
	Refund Point Operators	76 Agreements	Section 14.4	Medium / Low risk
	Logistics Providers	8 Agreements	Section 13	Low Risk
	Processors	4 agreements	Section 16	Low Risk
	Material Recovery Facilities	7 Agreements	Section 15	Low Risk
	Recyclers	33 Agreements	Section 9	Medium Risk
	Exporters	16 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 with the organisation or with respect to the Scheme. WARRRL 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:

- Commissioned the development of accessible training for the Refund Point network on modern slavery, along with the creation of standardised policies to supplement this training for suppliers, ensuring the Refund Point network are aware of and able to identify, prevent and report occurrences of Modern Slavery;
- Commissioned 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;
- 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. These tools have prompt questions and 'flags' for auditors and inspectors to look for. WARRRL have used these auditing tools to review modern slavery risks with suppliers on a periodic basis as part of this assurance work.
- Review of WARRRL's business continuity plans to ensure suitable measures are in place if modern slavery is detected within WARRRL's supply chain.
- Review of consumer understanding of accessibility to the WARRRL Whistleblower service which resulted in a change of terminology to Speak Up. This is to ensure the understanding of the reporting process matched consumer views on what to report.

### WARRRL commits to the following actions for FY25:

- Develop an implementation strategy to distribute the commissioned training materials to stakeholders and internally across WARRRL.
- Subscribe to various resource channels to observe any changes to Modern Slavery legislation.

### Approval

This statement was approved by the Board of Directors for WA Return Recycle Renew Limited on 26 August 2024.



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