

*This Modern Slavery Statement covers the activities of TOMRA Cleanaway Pty Ltd (“**TOMRA Cleanaway**”), during our financial year ended 30 June 2024 (“**FY24**”). It sets out the actions TOMRA Cleanaway has taken to identify and mitigate any potential **modern slavery risks** in TOMRA Cleanaway’s operations and supply chain in the twelve months ended on 30 June 2024.*

## 1 – Introduction

TOMRA Cleanaway is a joint venture between Cleanaway Pty Ltd (**Cleanaway**) and TOMRA Europe AS (**TOMRA**). Cleanaway is a leading waste management provider in Australia and listed on the ASX. TOMRA is a Norwegian listed company which invented the Reverse-vending machine. TOMRA Cleanaway operates as the Network Operator for Return and Earn, the NSW Container Deposit Scheme.

The joint venture manages a network of approximately 650 collection points across NSW incorporating reverse-vending machines, automated depots and over-the-counter operators (including small businesses, community groups and charities).

As an Australian business generating annual revenue in excess of AU\$100 million, we acknowledge that TOMRA Cleanaway is required to publish annual Modern Slavery Statements, in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) (“**Modern Slavery Act**”).

This is TOMRA Cleanaway’s fifth Modern Slavery Statement, which we have prepared in relation to FY24 (“**FY24 Modern Slavery Statement**”).

TOMRA Cleanaway is aware of the consultation requirements of the Modern Slavery Act. However, TOMRA Cleanaway does not control or own any other entities, nor does it form part of any other corporate group and therefore this Modern Slavery Statement relates solely to the operations of TOMRA Cleanaway.

A related entity, TOMRA Cleanaway (Victoria) Pty Limited, commenced operations in FY24 delivering the CDS across the Western Zone of Victoria and shares a common set of Directors and Management. The Victorian joint venture manages a network of approximately 200 collection points across the CDS Vic West Zone incorporating reverse-vending machines, automated depots and over-the-counter operators (including small businesses, community groups and charities). TOMRA Cleanaway (Victoria) Pty Limited does not meet the revenue threshold and is not required to publish a Modern Slavery Statement.

Another related entity, TOMRA Cleanaway (Tasmania) Pty Limited, will commence operations in FY25 delivering the CRS ‘Recycle Rewards’ across Tasmania and shares a common set of Directors and Management. The Company was not active, and as a result, this report does not reflect any Risk Assessment or actions relating to TOMRA Cleanaway (Tasmania).

Both related entities have similar modern slavery risks, controls and mitigating actions, and like TOMRA Cleanaway Pty Limited, are required to comply with all laws.

## 2 – What is modern slavery?

In this FY24 Modern Slavery Statement, the following terms have the following meanings:

- **modern slavery** refers to situations of serious exploitation, in which coercion, threats or deception are used to exploit victims and deprive them of their freedoms (including, amongst others, exploitative practices such as human trafficking, slavery, forced labour and child labour); and
- **modern slavery risk** refers to the prospect of a practice involving **modern slavery** occurring in a business’ operations and/or supply chain.

### 3 – Position statement

TOMRA Cleanaway will not accept the existence of any form of **modern slavery** in connection with our business. We recognise our responsibility to work with our shareholders, customers, employees, suppliers, contractors, buyers of our recyclable commodities and all other relevant stakeholders, to identify and mitigate any **modern slavery risks** in our operations and supply chain.

### 4 – Our organisational structure

TOMRA Cleanaway Pty Ltd is an Australian private company. TOMRA Cleanaway has two shareholders, being Cleanaway Pty Ltd and TOMRA Europe AS. TOMRA Cleanaway has its registered office located at 1A Raffles Glade Eastern Creek NSW 2766 Australia.

TOMRA Cleanaway (Victoria) Pty Ltd is an Australian private company. It shares the same shareholders and directors as TOMRA Cleanaway. TOMRA Cleanaway Victoria has its registered office located at Level 4 441 St Kilda Road Melbourne VIC 3004.

TOMRA Cleanaway (Tasmania) Pty Ltd is an Australian private company. It shares the same shareholders and directors as TOMRA Cleanaway. TOMRA Cleanaway Tasmania has its registered office located at 37 Birch Avenue Newstead TAS 7250.

### 5 – Our business

#### 5.1 – Operations

TOMRA Cleanaway provides container handling, transport, processing and recycling as well as data services as part of Return and Earn in NSW. A network of more than 650 collection points has been established across the state incorporating reverse-vending machines, automated depots and over-the-counter operators (small businesses). Each of these collection points enables citizens to redeem eligible beverage containers and receive a 10 cents per container refund.

TOMRA operates the reverse vending network, provides technology to third party operators and provides software and data services. Cleanaway provides logistics services, post collection services by sorting collected material and facilitates the sale of the recyclable commodities.

For further information about TOMRA Cleanaway's NSW operations, please refer to TOMRA Cleanaway's website (<https://TOMRAcleanaway.com.au/corporate/>).

Information on TOMRA Cleanaway's Victorian operations can be found at <https://tomracleanaway.com.au/victoria/>.

Information on TOMRA Cleanaway's Tasmanian operations can be found at <https://tomracleanaway.com.au/tas/>.

#### 5.2 – Supply chain

TOMRA Cleanaway's Management focussed on the following key categories of third-party expenditure as part of the Risk Assessment (defined in Section 6.1 of this FY24 Modern Slavery Statement below) conducted during FY24:

Category	Details
<b>Technology and assets acquired for use in the scheme</b>	Consistent with standard commercial practice, TOMRA Cleanaway facilitates the procurement of technology and assets for use in its operations.
<b>Outsourced specialist services</b>	As a joint venture formed to deliver a specific contract, TOMRA Cleanaway makes use of services provided by both of its shareholders. In addition, TOMRA Cleanaway receives corporate services and support from Cleanaway.
<b>Collection point partners</b>	There are a large number of small businesses and charities which participate in the network of collection points.

## 6 – Our approach: risk assessment and mitigation

### 6.1 – Overview

In preparation for compliance with the Modern Slavery Act (including publication of this FY24 Modern Slavery Statement), during FY24, TOMRA Cleanaway's Management:

1. conducted an assessment of the **modern slavery risks** which are presented by TOMRA Cleanaway's unique operations and supply chain ("**Risk Assessment**"); and
2. took various actions to mitigate the potential **modern slavery risks** which we identified as part of the Risk Assessment ("**Actions**").

Further details of the potential **modern slavery risks** which we identified as part of the Risk Assessment and the Actions which we took to mitigate those **modern slavery risks** are outlined in Sections 6.2 (Risk Assessment) and 6.3 (Actions) of this FY24 Modern Slavery Statement below.

### 6.2 – Risk Assessment: potential modern slavery risks

The Risk Assessment identified the following potential **modern slavery risks** in relation to TOMRA Cleanaway's operations and supply chain:

Area of business	Modern slavery risk	Description of modern slavery risk
<b>Operations &amp; Supply chain</b>	<b>Workforce risks</b>	That any person in TOMRA Cleanaway's workforce, is subject to any conditions which might be considered to constitute <b>modern slavery</b> . The Risk Assessment concluded that these procurement activities presented a low overall <b>modern slavery risk</b> , due to the robust human resources controls in place for employee onboarding and regular reviews of wages and salary agreements which assist in ensuring compliance with applicable legislation.
<b>Supply chain</b>	<b>Supply chain risks</b>	<p>That there are <b>modern slavery risks</b> in the operations and/or supply chains of TOMRA Cleanaway's various contractors and suppliers:</p> <ul style="list-style-type: none"> <li>• <b>supply of technology</b> – the Risk Assessment concluded that these procurement activities presented a relatively low <b>modern slavery risk</b>, due to the technical nature of these goods and the strong reputation and policies of the supplier (TOMRA);</li> <li>• <b>specialist logistics service providers</b> – the Risk Assessment concluded that these procurement activities presented a relatively low <b>modern slavery risk</b>, given that TOMRA Cleanaway's various service providers are well-reputed professionals in their respective fields and are physically located in Australia;</li> <li>• <b>collection point partners</b> – the Risk Assessment concluded that these procurement activities presented a low overall <b>modern slavery risk</b>, given that TOMRA Cleanaway's various partners comprise a significant number of small businesses and community organisations which are physically located in NSW and Victoria, Australia and, as a result, operator staff have access to various agencies dealing with employment conditions.</li> </ul>

### 6.3– Actions: mitigation of potential modern slavery risks

During FY24, TOMRA Cleanaway took the following Actions to mitigate the potential **modern slavery risks** which we identified as part of the Risk Assessment (see Section 6.2 above):

Area of business	Modern slavery risk	Action(s) taken to mitigate modern slavery risk
<b>Human resources</b>	<b>Lack of awareness</b>	<p>In FY24, TOMRA Cleanaway participated in initiatives for raising awareness of modern slavery, including mandatory online training of all white-collar employees. In addition, all new staff are required to complete modern slavery training as part of their onboarding process</p> <p>In FY24, TOMRA Cleanaway employees participated in the Respect@Cleanaway programme to build a safe, inclusive and respectful culture.</p> <p>The TOMRA Cleanaway Finance Director participated in the Cleanaway Group Modern Slavery Committee which meets to oversee and monitor day-to-day implementation of Cleanaway’s compliance with Modern Slavery Act requirements.</p>
<b>Operations &amp; Supply chain</b>	<b>Workforce risks</b>	<p>During FY24, TOMRA Cleanaway’s Management took the following Actions to mitigate the “Workforce risks” referred to in Section 6.2 above:</p> <ul style="list-style-type: none"> <li>• <b>Employees (i.e. Operations)</b> – TOMRA Cleanaway’s direct labour force has been assessed as low risk. This classification is due to the robust human resources controls in place for employee onboarding and regular reviews of wages and salary agreements which assist in ensuring compliance with applicable legislation. The compensation, benefits and entitlements received by TOMRA Cleanaway employees meet or exceed Australian legislative requirements. Moreover, the policies and procedures in place to address modern slavery and human rights offer additional protections to our staff; and</li> <li>• <b>Collection Point Operators</b> - TOMRA Cleanaway issued information to collection point operators to address the identification and mitigation of modern slavery risks which arise in small businesses.</li> </ul>
<b>Supply chain</b>	<b>Supply chain risks</b>	<p>During FY24, TOMRA Cleanaway’s management took the following Actions to mitigate the “Supply chain risks” referred to in Section 6.2 above:</p> <ul style="list-style-type: none"> <li>• <b>Supply of technology</b> – refer to TOMRA Systems Business Principles for Suppliers &amp; Partners attached. This is further supported by TOMRA’s Code of Conduct (Section 3.3) dealing with Human Rights. TOMRA’s local subsidiary, TOMRA Collections Solutions, does not currently meet the reporting threshold however is subject to this group document; and</li> <li>• <b>Specialist logistics service providers</b> – refer to Cleanaway’s Modern Slavery Statement (FY24) attached.</li> </ul>

### 6.4 – Effectiveness of Actions

As at the date of this FY24 Modern Slavery Statement, we have not yet identified any material incidents of **modern slavery** occurring in our operations and/or supply chain and are therefore satisfied with the adequacy of the Actions which we took during FY24 to mitigate the potential **modern slavery risks** which were identified as part of the Risk Assessment.

## 7 – Our plans for FY25

During FY25, we plan to:

1. Continue mandatory modern slavery training for new employees and all white-collar employees.
2. Implement appropriate modern slavery risk assessments in respect of the TOMRA Cleanaway (Tasmania) business in line with established processes.
3. Promote access to third party FairCall in terms of TOMRA Cleanaway's Whistleblower Policy for all employees to encourage the reporting of modern slavery risks.
4. Monitor and review to identify and mitigate potential **modern slavery risks**, prioritising our activities based on:
  - i. the identification (and mitigation) of any new **modern slavery risks** which arise in our operations and/or supply chain; and
  - ii. any inadequacies which we identify in relation to the ability for our existing actions to appropriately mitigate the potential **modern slavery risks** which we have identified (and will, in the future, identify) in relation to our operations and/or supply chain.
5. Continue to strengthen awareness of **modern slavery risks** in our network of Collection Points to address the identification and mitigation of new **modern slavery risks** which arise.



**Tracey Boyes**

**Director**

**29 January 2025**

***This FY24 Modern Slavery Statement has been approved by the Board of Directors of TOMRA Cleanaway Pty Ltd.***

Annexure A: Cleanaway FY24 Modern Slavery Statement

Annexure B: TOMRA Corporate Responsibility Statement

Annexure C: TOMRA Systems Business Principles for Suppliers & Partners