

**BUILDING STRONGER  
FOUNDATIONS**  
*together*



# Contents

## A message from our CEO

### Section 1 2

Overview

### Section 2 3

Our structure, operations and supply chain

### Section 3 9

Risk of modern slavery in operations and supply chain

### Section 4 10

Actions taken to assess and address modern slavery risks


### Section 5 18

Assessing the effectiveness of our actions

### Section 6 19

Priorities for FY25



This is an interactive PDF designed to enhance your experience. The best way to view this report is with Adobe Reader. Click the links on the pages or use the home button  in the header to navigate the report.



Cleanaway acknowledges the Traditional Owners of the lands on which we operate and in the communities in which we live and work. We pay our respect to all Aboriginal and Torres Strait Islander people and to their Elders past, present, and future, for they hold the traditions and the culture, and together, we hold the hopes of a truly reconciled Australia.



# Highlights from FY24

## Our work to eliminate modern slavery includes:

- Introducing our Respect@Cleanaway Program to build a safe, inclusive and respectful culture at Cleanaway.
- Desktop audits of over 100 suppliers assessed as a higher risk, via an independent third party.
- Two in-person independent audits of an international steel manufacturing company in China, assessed as a higher risk supplier.
- Two pay slip audits for a major customer to ensure workers were paid the correct wages for the hours they worked.
- Revising onboarding, induction and training to include our modern slavery and human rights policy and objectives.
- Adopting a new supplier platform, Informed 365, to manage our due diligence.
- New modern slavery clauses in Cleanaway's owner driver agreements, purchase order standard terms and conditions, and master services agreements.

## A message from our CEO

At Cleanaway, our purpose is to make a sustainable future possible together. Supporting the delivery of our purpose are our recently launched Guiding Principles, that serve as a roadmap for creating a workplace where everyone feels safe and respected. It is with this in mind that we are committed to addressing risks of modern slavery occurring within our business and our supply chain.

Over the last 12 months, we continued to investigate our supply chain for instances of modern slavery using desktop and in-person audits. It was encouraging to see one of our in-person, offshore audits resulting in improved conditions for workers at one of our offshore suppliers, as outlined on [page 15](#).

We transitioned to Informed 365 to manage our supplier due diligence and commenced working with other members using this platform to develop a cohesive approach to engaging suppliers. We strengthened our governance and risk management processes and practices by adding modern slavery compliance conditions in our new owner-driver agreements, purchase order standard terms and conditions, as well as our master services agreements with suppliers.

We have matured in our approach to managing modern slavery risk and are pleased with our progress over the past three years. We are now well positioned directionally and will continue to review and strengthen our modern slavery framework.

Modern slavery demands our vigilance and we remain committed to the goal of eliminating it from our operations and supply chains.

Stay safe out there.

**Mark Schubert**  
Chief Executive Officer and Managing Director

# Overview

## About this Statement

As an Australian business generating annual consolidated revenue in excess of AU\$100 million, 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 joint Modern Slavery Statement ('Statement') is made by Cleanaway Waste Management Limited on behalf of the 'reporting entities' within its corporate group (collectively referred to as 'Cleanaway'); details of which are set out in Section 1.1. This Statement sets out the actions Cleanaway has taken to identify, assess and mitigate any actual or potential modern slavery risks in Cleanaway's operations and supply chain in the year ended 30 June 2024 ('FY24').

## 1.1 Reporting entities

This Statement is made by Cleanaway Waste Management Limited on behalf of the following reporting entities ('the reporting entities'):

- Cleanaway Co Pty Ltd
- Cleanaway Operations Pty Ltd
- Cleanaway Pty Ltd
- Cleanaway Solid Waste Pty Ltd
- Cleanaway Industrial Solutions Pty Ltd
- Landfill Operations Pty Ltd
- Cleanaway Daniels Services Pty Ltd

This Statement does not apply to our joint ventures given that Cleanaway has no control over these entities from a shareholding or operational perspective.

## 1.2 Consultation

Cleanaway adopts a unified and comprehensive approach to managing all modern slavery risks amongst our reporting entities. Our Shared Governance Framework ensures a consistent methodology, guides our overall strategy for managing modern slavery risks and informs our reporting practices.

For instance, our Cleanaway's centralised Legal, Sustainability, Procurement, Human Resources and Finance functions play a vital role in providing guidance and support to our reporting entities, to ensure compliance with our approach to assessing and addressing modern slavery risks, utilising all relevant legislation, adoption of procurement-related standards and providing training.

## 1.3 Key concepts

This Statement:

Addresses the criteria of the Modern Slavery Act as set out in the Appendix to this Statement. Unless otherwise stated, the information provided in each Section of this Statement applies to all reporting entities.

- Uses the Modern Slavery Act's definition of modern slavery, which includes the following criteria: situations of serious exploitation, where coercion, threats or deception are used to exploit victims, including, amongst others, human trafficking, debt bondage, slavery, forced labour, deceptive recruiting for labour or services, and the worst forms of child labour. Modern slavery risk refers to the prospect of a practice involving modern slavery occurring in a business' operations and/or supply chain.
- Uses the terms 'we', 'us', 'our', 'ourselves' and 'Cleanaway' to refer to Cleanaway Waste Management Limited and its controlled entities, including the reporting entities. These terms are used for convenience. They are not intended to convey how Cleanaway is structured, managed, or controlled from a legal perspective.

This Statement was approved on 23 September 2024 by the Cleanaway Board and signed by the CEO, of Cleanaway Waste Management Limited on behalf of all reporting entities in accordance with section 14(2)(d)(ii) and (e)(ii) of the Modern Slavery Act.

We welcome your feedback at: [ModernSlavery@cleanaway.com.au](mailto:ModernSlavery@cleanaway.com.au)



# Our structure, operations and supply chain

## 2.1 Organisational structure

Cleanaway Waste Management Limited is a publicly listed company on the Australian Securities Exchange (ASX:CWY).

Cleanaway, including its reporting entities, is centrally managed from our Corporate Head Office, located at Level 4, 441 St Kilda Road, Melbourne. Activities undertaken by Cleanaway are outlined in Section 2.3 of this Statement.



<sup>1</sup> Not a reporting entity.

## 2.2 Joint ventures

Cleanaway is party to a number of joint ventures that operate as separate entities. Unless otherwise stated, Cleanaway does not control any of the entities from a shareholding or operational perspective. Accordingly, this Statement does not cover the activities of any of these joint ventures, nor were they assessed as part of Cleanaway's operations or supply chain.

The trading joint ventures to which Cleanaway was a party during FY24 were as follows:

- TOMRA Cleanaway joint venture** is a 50/50 joint venture with TOMRA Systems ASA, a Norwegian reverse vending manufacturer and supplier, to operate the container deposit schemes in Victoria and New South Wales. These joint ventures have their own Modern Slavery Statements.
- Cleanaway ResourceCo RRF Pty Ltd** is a joint venture with ResourceCo that operates a resource recovery facility at Wetherill Park in New South Wales. We hold a minority interest in this joint venture. This is discussed further in ResourceCo's Modern Slavery Statement.
- Circular Plastics Australia (PET) Holdings Pty Ltd** is a joint venture between Cleanaway (who holds a minority interest), Pact Group, Asahi Beverages and Coca-Cola Europacific Partners with facilities in Albury, New South Wales and Altona North, Victoria. These facilities recycle used PET bottles and containers into food grade recycled PET material, used to produce new beverage bottles and food grade packaging. This entity has its own Modern Slavery Statement.
- Circular Plastics Australia (PE) Pty Ltd** is a 50/50 joint venture between Cleanaway and Pact Group that is operating a state-of-the-art recycling facility in Laverton North, Victoria processing HDPE and PP plastic milk bottles, containers and food tubs into food grade and non-food grade recycled HDPE and PP resin. This facility opened in FY24. This entity has its own Modern Slavery Statement.
- Pilbara Environmental Services Pty Ltd** is a 50/50 joint venture between Cleanaway and Kingkira Group delivering regional and remote heavy industrial cleaning, waste management and environmental support services. While Cleanaway controls this entity for accounting purposes, it does not meet the statutory definition of a 'reporting entity' for the purposes of the Act.

These entities have similar modern slavery risks, controls and mitigating actions available to them and, like Cleanaway, are required to comply with all applicable laws.

## 2.3 Our operations

Cleanaway is Australia's leading waste management, industrial and environmental services company, providing over 300 products and services across ~330 branches nationwide. Our dedicated team of over 7,900 workers is supported by Australia's largest fleet of more than 6,300+ waste, recycling and liquids collection vehicles.<sup>1</sup>



**300**

Products



**~330**

Branches nationwide



**7,900+**

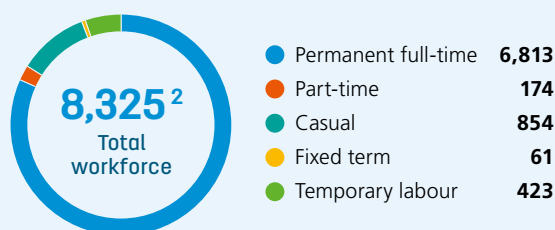
Workers



**6,350+<sup>1</sup>**

Collection vehicles

### Our workforce



### Our net revenue

**\$3,194.5m**

For the year ended  
30 June 2024

<sup>1</sup> Includes heavy and light road vehicles, site-based industrial vehicles and trailers.

<sup>2</sup> Total workforce includes temporary workforce.



Our operations are divided nationally into the following three operating segments:



## Solid Waste Services

Cleanaway collects solid waste from approximately 140 municipal councils and 100,000 Commercial and Industrial customers across Australia. The services consist of both collection and post-collection services (i.e. disposal and resource recovery).

### Reporting entities:

Cleanaway Pty Ltd  
Cleanaway Co Pty Ltd  
Cleanaway Operations Pty Ltd  
Cleanaway Solid Waste Pty Ltd  
Landfill Operations Pty Ltd

### Modern slavery risk:

Direct labour  
Temporary labour  
Overseas recruitment  
Waste collections  
Construction  
Logistics  
Facilities management  
Security services



## Liquid Waste and Health Services

The Liquid Waste and Health Services businesses generate revenue from collection, treatment, processing, refining, recycling and destruction of hazardous and non-hazardous liquids, hydrocarbons (i.e. used oil recycling), chemical waste and hazardous waste.

Cleanaway's Health Services business provides services for the safe treatment and disposal of health-related waste which includes sharps management, medical waste, pharmaceutical waste, healthcare hazardous waste and quarantine waste.

### Reporting entities:

Cleanaway Pty Ltd  
Cleanaway Co Pty Ltd  
Cleanaway Operations Pty Ltd  
Cleanaway Daniels Services Pty Ltd

### Modern slavery risk:

Direct labour  
Temporary labour  
Waste collections  
Construction  
Logistics  
Facilities management



## Industrial and Waste Services

Cleanaway's Industrial and Waste Services business provides a wide range of services including drain cleaning, non-destructive digging, vacuum loading, high pressure cleaning, pipeline maintenance, hydro-excavation, site remediation, CCTV and other technical services. These specialised services are supplied to customers in the Oil and Gas, Resources and Infrastructure sectors.

### Reporting entities:

Cleanaway Pty Ltd  
Cleanaway Co Pty Ltd  
Cleanaway Operations Pty Ltd  
Cleanaway Industrial Solutions Pty Ltd

### Modern slavery risk:

Direct labour  
Casual labour  
Waste collections  
Temporary labour



## FY24 spend and suppliers:

**\$2.9B<sup>1</sup>**

Total spend

**\$1.9B<sup>2</sup>**

Addressable spend

**7,482**

Total suppliers

**7,127**

Centralised suppliers

**7,066**

Number of suppliers in  
the centralised spend  
category with operations  
based in Australia

**99%**

of spend was with  
Australian businesses  
based in Australia

**1%**

of spend was with  
foreign suppliers

# 2.4 Our supply chain

The risk levels were informed by the Global Slavery Index 2018 and reports of modern slavery activity based on geographical region and industry sector. Our reputation depends on the actions of our suppliers as well as our own. However, we understand that many more indirect suppliers are part of our extended supply chain by providing goods or services to our direct suppliers.

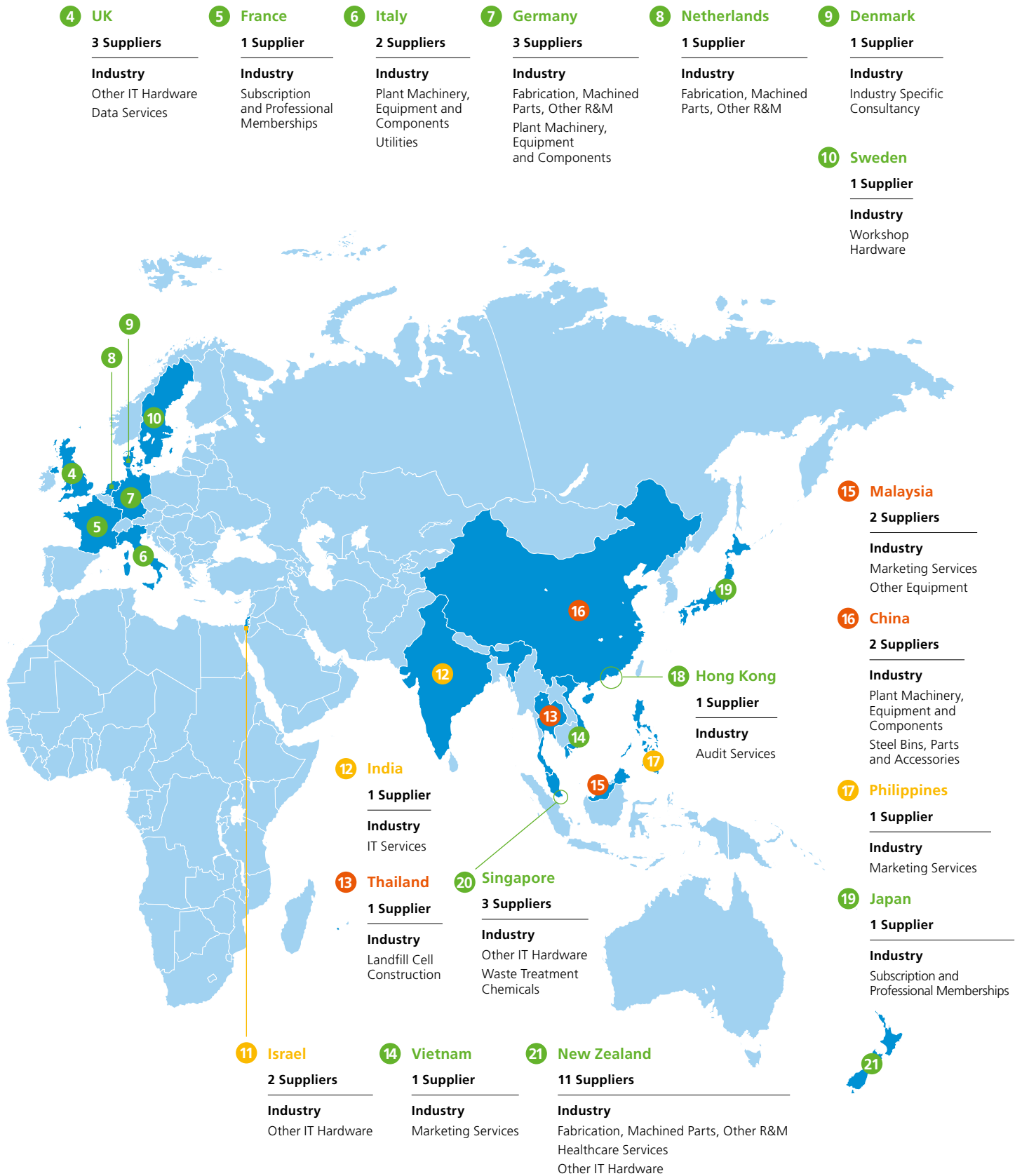
We remain focused on addressing the risks of modern slavery in our direct supply chain, but we also recognise that this risk can often sit within our indirect supply chains and we have a lot more work to do to have a better understanding of this risk.



### Key

● Low risk    ● Medium risk    ● High risk





1 The spend excludes the following Cleanaway subsidiaries: Cleanaway Daniels, Global Renewables Holdings, Grasshopper, Vins Bins and ASP Plastics since these are not reporting entities.  
 2 Spend level comprises addressable spend (i.e. the spend that Cleanaway can influence and excludes expenses such as taxes and inter-company expenses).  
 3 The data displayed represents spend with our direct suppliers.

## Procurement category spend

Our suppliers provide diverse goods and services to help us deliver waste management, industrial, environmental and health services.

Our central procurement team manages Cleanaway's material and high risk expenditure. Any spending that this team doesn't oversee is generally transactional, such as facilities maintenance, equipment, and other site needs. The spending of Cleanaway's reporting entities with direct suppliers in each category is set out below.

These supply categories have a higher risk of modern slavery as they are associated with employing a higher percentage of workers from potentially more vulnerable populations. Complexities within our labour supply chain, including where subcontracting arrangements are in place, limit Cleanaway's visibility over pay and working conditions of persons involved.



**\$100m+**

### Waste collection

Examples: Owner Drivers  
Subcontractor Collection



**\$100m+**

### Construction

Examples: Civil Construction Materials, Landfill Construction Soils and Clays, Synthetic Liners, Membranes and Consumables, Building Construction, Civil Construction (Non-Cell/Capping), Landfill Cell Construction, Landfill Gas Infrastructure Construction



**\$50–\$100m**

### Logistics

Examples: Ground Freight



**\$50–\$100m**

### Temporary labour

Examples: Temporary Labour



**\$100m+**

### Facilities management and utilities

Examples: Facilities Management Services, Fire Services, General Site Services, Office Furniture, Electricity, Natural Gas, Utilities, Water



**>\$10m**

### IT hardware

Examples: Computers, Other IT Hardware, Printers



**>\$10m**

### Uniforms and workwear

Examples: Laundry Services, PPE, Workwear



**>\$10m**

### Security

Examples: Security Services



# Risk of modern slavery in operations and supply chain

**Modern slavery is an inherent risk in our operations and supply chain, but we remain committed to human rights of all people we work with and for, as set out in the United Nations Declaration on Human Rights, the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.**

**We have identified risks in the following areas in our operations and supply chain:**

## Facilities management

Facilities management involves a variety of activities, including cleaning, and may carry a higher risk due to factors such as the industry's reliance on subcontracting arrangements, workers from vulnerable populations, and after-hours work with little supervision.

## Uniforms and personal protective equipment (PPE)

The textile industry has a range of risk factors, such as linkages between the various inputs into the supply chain. For example, the workwear supply chain might include Xinjiang cotton, Uyghur labour use, and high-risk business models and production regions.

## IT goods and services

We purchase finished goods from reputable suppliers, but know that raw materials and components of the finished goods may be sourced and manufactured in jurisdictions with higher risks of modern slavery.

## Logistics and transport

Cleanaway directly manages a large portfolio of logistics suppliers who transport waste and other essential business commodities. Logistics and transport are also important elements of our indirect supply chain. There is a relatively high likelihood of adverse business practices such as forcing contracts by threat or duress, imposing an unsafe number of working hours, employing vulnerable populations, and non-payment for non-driving work such as loading or waiting.

## Indirect labour

Indirect labour is often characterised by a higher number of workers from vulnerable populations who may be less aware of their workplace rights and more susceptible to unauthorised subcontracting and independent contracting. For these reasons, our waste collection, construction and security services are all assessed as being a higher risk.

Cleanaway also engages a small number of contractors for skilled white-collar labour in higher-risk countries, which carries different risks: workers tend to be highly educated and day-to-day work has fewer inherent health and safety risks. Working overseas may limit Cleanaway's visibility over their working conditions.

## Direct labour

Cleanaway directly employs over 7,900 workers, and has direct control and visibility over the pay and working conditions for those it directly employs. In addition, Cleanaway requires that a person holds Australian working rights to be employed.

# Actions taken to assess and address modern slavery risks

## 4.1 Governance and oversight structure

We have established a governance structure for managing modern slavery risks across our operations and supply chain. Human rights risks, including modern slavery, are considered within Cleanaway's broader governance framework.



### Cleanaway Board

Responsible for the overall leadership, stewardship, strategic direction, governance, and performance. The Board has ultimate oversight of Cleanaway's compliance with modern slavery laws.



### Sustainability Committee

A subcommittee established by the Board, the Sustainability Committee provides oversight of Cleanaway's modern slavery program and ensures that Cleanaway meets its legal and regulatory environmental obligations. The committee consists of three Non-Executive Directors.



### Executive Team

The Executive Team comprises the Managing Director and Chief Executive Officer, Chief Financial Officer, General Counsel and Company Secretary, Chief People Officer, Executive General Manager of Solid Waste Services, Executive General Manager of Liquid Waste and Health Services, Industrial and Waste Services, Executive General Manager of Customer and Growth, Executive General Manager of Health, Safety and Environment, Executive General Manager of Strategy, Mergers and Acquisitions, Executive General Manager of Energy from Waste and Executive General Manager of Commercial.

Members provide strategic leadership on operational and functional activities, including our actions to assess and manage our modern slavery risks. The executive team also approves our human rights policy.



### Modern Slavery Working Group

The working group comprises the Chief People Officer, General Counsel and Company Secretary, and Chief Financial Officer, plus representatives from functions across the organisation, including human resources, employee relations, procurement, legal, sustainability, investor relations and finance.

Formed in 2020, the group meets bi-monthly to oversee day-to-day implementation and monitor Cleanaway's compliance with Modern Slavery Act requirements. The working group presents its assessment of modern slavery risks, mitigation efforts and management strategies to our executive team for discussion and endorsement.

This governance framework is also supported by our policy framework, set out in [Section 4.2](#).

- ▶ [Click here for more information on Cleanaway governance structure.](#)
- ▶ [Visit our website for more information on Cleanaway's corporate governance.](#)

## 4.2 Our policy framework

**Our policies and procedures establish clear expectations for how we work and what we expect from those who work with or work for Cleanaway.**

**Policies on human rights and assessing and preventing modern slavery risks within our operations and supply chain include:**

### Code of conduct

The code defines how we do business and the standards of behaviour expected from those who work in or for our business. It emphasises our commitment to operating honestly, ethically, responsibly and with integrity.

### Supplier code of conduct

This code defines minimum requirements from our suppliers, including compliance with the Act. Specifically, we communicate that all suppliers, not just those subject to the Act, must comply with Cleanaway's compliance standards.

### Social procurement statement

The statement sets out our vision for positive environmental, social and governance outcomes for our community through our supply chain, by focusing on modern slavery, social enterprises, First Nations businesses and environmentally sustainable initiatives.

### Human rights policy

Our Human Rights Policy sets out our commitment to respect and support the human rights of all people, whether they are our employees, in the communities where we operate, within our supply chain, or those who may be impacted by our activities.

### Anti-bribery and corruption policy

This policy strictly prohibits those who work at or with Cleanaway from engaging in conduct that constitutes bribery or corruption, which may facilitate modern slavery.

### Whistleblower policy

This policy outlines how those working at or with Cleanaway, their associates or dependants, can raise concerns anonymously about any actual or suspected contravention of policies or applicable laws, including modern slavery. It sets out the mechanism to report to the independent third-party service, FairCall.

### Purchase order terms and conditions

Each supplier contracted by our purchase order terms and conditions must comply with all modern slavery legislation, ensure that their representatives and suppliers also avoid engaging in modern slavery, promptly provide requested information to Cleanaway for compliance verification, and notify Cleanaway immediately in writing if they become aware of any breaches or instances of modern slavery related to their supply chain or operations.

➤ [Visit our website more information on Cleanaway's policies and procedures.](#)



### 4.3 Assessing and addressing risk in our operations

**Cleanaway's direct labour force is considered lower risk of modern slavery due to robust human resource controls for employee onboarding and regular reviews of wages and salary agreements, which assist in ensuring compliance with legislation.**

The compensation, benefits and entitlements Cleanaway's employees receive meet or exceed Australian legislative requirements. We currently have more than 100 Enterprise Agreements covering 55% of our employees. Our policies to address modern slavery and safeguard human rights, set out in **Section 4.2**, protect our workers further by fostering safe and equitable working environments.

Internal programs, including Respect@Cleanaway and Speak Up also support employees alongside whistleblower and grievance mechanisms, as set out in **Section 4.5**.

Cleanaway's indirect labour force is considered to be higher risk, based on modern slavery risk factors. While no accusations have been made or cases of modern slavery uncovered, Cleanaway recognises our indirect labour force is potentially vulnerable.

The size and nature of our business means our workforce composition can vary over time as contract and labour hire workers are engaged. We are just as committed to protecting our contractors and honouring our agreements with them as we are with our direct employees.



**In FY24, we identified the following risks in our operations that are consistent with previous years:**

### ➤ Temporary labour

Cleanaway sources temporary labour during service demand peaks. This brings with it a higher risk of modern slavery as:

- Roles typically have a lower barrier to entry, attracting lower-skilled workers, migrants and other vulnerable populations.
- The seasonal nature of the work means limited job security.
- There is less visibility over what workers are paid.

### ➤ Owner drivers and subcontractors

Cleanaway engages subcontractors and owner drivers for its collection services, primarily in our Solid Waste Services division. These workers enter a standard contractual agreement with Cleanaway to perform these services. Owner drivers and collection subcontractors are at a higher risk of modern slavery as they:

- May employ lower-skilled workers from vulnerable populations.
- May provide a service at a fixed price rather than according to the hours they work.
- May engage in subcontracting or unauthorised subcontracting of services which gives Cleanaway less visibility over what workers are paid.

### ➤ International recruitment

Cleanaway employs a limited number of overseas contractors to provide specialised services. This includes IT personnel in India and communication and design specialists in Malaysia, Vietnam and the Philippines. These professionals have high levels of expertise, which brings lower risk. However, the Global Slavery Index identifies these countries as having heightened risks of modern slavery as:

- There may be varying degrees of employment protection for workers.
- There may be a relatively higher incidence of modern slavery.
- There may be a large number of migrants and other vulnerable populations.

**In FY24, we undertook the following actions to address modern slavery risks in our operations:**

### ➤ Indirect labour

- Further strengthened our governance and risk management by inserting clauses relating to modern slavery in owner driver agreements, purchase order standard terms and conditions, and master services agreements. These clauses require certain standards be met, including adherence to Cleanaway's Codes of Conduct and the right of audit.
- Attached the revised Supplier Code of Conduct to our onboarding system requiring all new suppliers to acknowledge that they have read and understood their obligations, and our expectations regarding modern slavery compliance.

### ➤ Direct labour

- Revised onboarding and induction processes to include critical elements of our Human Rights policy and objectives.
- Launched our new Guiding Principles which will be the foundation of culture that fosters growth, innovation and inclusivity and encourages safety, internal collaboration and proactive, customer-focused approaches.
- Introduced Respect@Cleanaway and the Speak Up Program to build a safe, inclusive, respectful culture at Cleanaway and support our adherence with legislation. The program draws a clear line against abuse, harassment, discrimination and disrespectful conduct.



## 4.4 Assessing and addressing risk in our supply chain

**Our FY24 procurement spend and risk profile remained consistent with previous years. Approximately 99% of our direct spend is with Australian-based businesses, as set out in Section 2. We continue enhancing our risk management approach, utilising technology, and working with our customers and suppliers.**

**In FY24, we took the following action to assess modern slavery risk in our supply chain:**



### Supplier risk management

Following an investment in new supplier information management software last year, in FY24 all new suppliers onboarded now provide Cleanaway with their modern slavery compliance information.

This information categorises suppliers as high, medium or low risk by industry, geography and spend. We prioritise audits for suppliers where we have high procurement spend. For suppliers rated as low and medium risk, we issue a due diligence survey to request data on the company's approach to managing labour and human rights. Survey responses are assessed, and suppliers who do not meet our standards are assessed further to determine what action, if any, should be taken.

As part of our Supplier due diligence program we also completed desktop audits of over 100 suppliers considered higher-risk and undertook two in-person independent audits of an international steel manufacturing company in China, considered a higher-risk supplier.

**In FY24, we took the following action to address modern slavery risk in our supply chain:**



### Transitioned to a new supplier due diligence platform – Informed 365

Cleanaway collaborated with technology provider Informed 365 and the Property Council of Australia to assess and manage modern slavery risks in its supply chains.

Using Informed 365's platform to collect information on suppliers, members of the council are now able to assess, compare, track year-on-year progress and report on their supply chain networks more easily. The platform ensures consistency across the industry, streamlines reporting, and reduces administration. It also makes it easier for suppliers to share information with organisations they choose.

Informed 365 also holds monthly meetings where members can discuss opportunities, risks and emerging trends, receive updates on educational resources, reports and toolkits, events and briefings, and hear from guest speakers about sustainable procurement, supply chains, human rights and modern slavery.

This collaboration supports continuous improvement, sharing skills and knowledge, and increasing leverage and access to best practice examples.



### Invoice review

For the first time, Cleanaway collaborated with a major customer to review the subcontractors we use. The customer requested payslips for four Cleanaway drivers, including two employees and two owner drivers from two different pay periods, to check wages, overtime, superannuation and taxes. We received positive feedback from the customer on completing the audit, which demonstrated how a coordinated approach can strengthen supplier relationships as well as manage risks.





## Working with our suppliers to achieve positive outcomes

As part of our commitment to safe and ethical supply chains, Cleanaway engaged a third-party auditor to carry out an in-person SMETA audit of a new steel supplier in Yangzhou, China, in 2024.

The audit identified that there were issues with worker health and safety, treatment, and payment.

Cleanaway's head of procurement sought strategic guidance from the senior leadership team, while the procurement team called the auditor for guidance on the next steps. Business stakeholders were also contacted to ensure effective communication of buying instructions.

After weighing up the situation, we informed the supplier that our continued business was contingent on improving conditions in each area of non-compliance.

Cleanaway and the auditor worked closely with the supplier – who was eager to

implement changes – to put in place best practices. When Cleanaway conducted the audit again, non-compliance dropped from 31 to two. We confirmed with the auditor that the improvement was genuine and sustainable.

The contract was amended so we could continue to audit our supplier in the future, and we resumed purchases.

Cleanaway has not typically sought supply from overseas, so this was new territory for us and an opportunity to learn lessons for all our supplier relationships. Cleanaway is now strengthening our tender assessments, particularly when sourcing from overseas.

Following through on our commitment to safety and human rights has also made a real difference – remediating the unsafe and unethical situation with this supplier as well as contributing to the global effort for sustainable development.





## Social Procurement Strategy

Cleanaway is in the initial stages of developing an organisation-wide strategy to embed social factors into its procurement decisions. Our goal is to enhance our affiliation with social enterprises and Indigenous-owned businesses through increased spend and contract values, as well as number of engagements. We believe that doing so will create positive outcomes in the communities where we work while differentiating Cleanaway as a leader.

So far, we have identified, engaged and trained leaders in the business with the potential to make an impact in this space. We have also begun to develop partnerships with external suppliers. Ultimately, this initiative will leverage relationships to influence Cleanaway buyers to consider social enterprises and Indigenous-owned businesses before they commit to a supplier.

▶ [View Cleanaway's social procurement strategy.](#)

## 4.5 Grievance mechanisms

**Cleanaway follows the United Nations' Guiding Principles on grievance mechanisms and is working to make sure they are effective.**

Cleanaway is committed to treating complaints seriously, sensitively and confidentially. All current and former employees, contractors and suppliers can report concerns anonymously, freely and without fear of reprisal or intimidation.

As well as contacting a Cleanaway representative, a person reporting a concern can use FairCall, our independent third-party service. Using FairCall, individuals can raise their concerns anonymously and confidentially, including those relating to modern slavery. FairCall offers multiple language options and can be accessed by phone, email or fax.

Our employees receive training on Cleanaway's Whistleblower Policy and are reminded regularly of the FairCall service and their protections under the Whistleblower Policy.

FairCall is not intended to replace a grievance mechanism, however all potential modern slavery or broader human rights concerns or allegations received through the hotline are investigated.

In FY24 we also introduced an additional anonymous reporting channel for employees and contractors, the Speak Up Program, which includes translation capabilities. If any employee or contractor witnesses or experiences inappropriate behaviour, there are multiple reporting options available to ensure every voice is heard.

No disclosures regarding labour rights or modern slavery were reported to FairCall or the Speak Up Program during FY24.

## 4.6 Remediation process

**United Nations' Guiding Principles require businesses to address and collaborate on rectifying identified human rights violations, including modern slavery, that they may have caused or contributed to.**

If such a violation occurs, our Modern Slavery Working Group will investigate to determine whether Cleanaway has caused or contributed to the identified modern slavery harm. Investigating modern slavery incidents or allegations can be complex and context specific. Findings will be reported through the governance structure outlined in [Section 4.1](#).

The Modern Slavery Working Group will make its recommendations for remediation on a case-by-case basis. If the group concludes that we have caused or contributed to modern slavery, Cleanaway will endeavour to remediate or cooperate in the remediation of the harm, in a way consistent with the United Nations' Guiding Principles. This may include agreeing to a framework to mitigate the risk of a violation happening again.

If we are not satisfied with a supplier's response to violation, we will generally seek to work with them to mitigate the risk. In some situations, we may remove the supplier from our supply chain and terminate our engagement with them.

### Remediation steps:



#### Step 1

We receive a modern slavery grievance or identify a potential modern slavery issue, through:

- Our FairCall service.
- Cleanaway's organisational structure.
- Active monitoring.

This is escalated to our Executive Team and Modern Slavery Working Group.



#### Step 2

We undertake an initial assessment to determine whether an internal or external investigation is appropriate, and establish the appropriate communication procedure.



#### Step 3

Where required, we or a third party undertake an investigation to verify the modern slavery grievance or issue.

Cleanaway has developed a set of key principles to guide its investigative response, including:

- Adopting a 'do no harm' approach.
- Setting out key investigative steps, such as whether and how we would engage with suppliers, unions, NGOs and other stakeholders and the process for involving law enforcement.
- Outlining the process for escalating a modern slavery incident or allegation internally.



#### Step 4

We remediate, monitor, report and learn, and we take immediate steps to correct the victim's situation tailored to their circumstances, and monitor their progress by:

- Reporting the findings to key stakeholders and, as required by law.
- Working with the perpetrator to remediate and resolve the issue or remove them from our business or supply chain.
- Assessing the effectiveness of the procedure to ensure continuous improvement.

# Assessing the effectiveness of our actions

Measuring how effective our actions are on modern slavery is challenging. As laid out in this document, we continue to invest in controls and improve our modern slavery risk management framework by:

- Regularly evaluating our processes and procedures against best industry practise and peer companies.
- Monitoring suppliers participating in the third-party supplier survey, to help us track, assess and evaluate our risks on an ongoing basis.
- Regularly reviewing governance, processes and procedures to ensure they are fit for purpose.
- Using our cross-functional Modern Slavery Working Group to monitor our actions, drive improvements to our processes, to address gaps and opportunities.
- Extending our modern slavery training across Cleanaway, addressing knowledge gaps, and making sure our training content is fit for purpose.
- Analysing modern slavery-related complaints or grievances received through FairCall, our whistleblower mechanism or other channels to identify trends and gaps in our controls.

Further details on our priorities for FY25 are found in [Section 6](#).





# Priorities for FY25

## In FY25, we will prioritise the following actions:

- Continue to explore opportunities to engage with our customers and peers in similar sectors.
- Develop a formal framework to track the effectiveness of Cleanaway's modern slavery risk management.
- Engage with labour hire firms to provide workers with information about workplace rights and reporting concerns.
- Deepen our understanding of our supply chain, beyond our direct suppliers.
- Execute the annual audit program based on snapshot of suppliers by risk category and undertake deep dive on higher-risk categories.
- Provide ongoing training for employees to recognise and respond to potential instances of modern slavery.

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