



# Modern Slavery Statement FY'21

# MODERN SLAVERY STATEMENT FY'21

This Modern Slavery Statement (“MMS”) relates to the reporting period of 1 July 2020 to 30 June 2021 and made pursuant to the Modern Slavery Act 2018 (Cth) by J.J. Richards & Sons Pty Ltd (ACN 000 805 425) (“JJR”) in respect of JJR and its wholly owned and controlled subsidiary entities (“together referred to as we, us, our, the JJR Group”).

## Our Structure, Business and Supply Chains

Structure	Operations	Supply Chains
<p>JJR is an Australian waste management organisation with over 2,000 employees and is a privately owned company incorporated in Australia.</p> <p>Our corporate head office is located at 3 Grant Street, Cleveland, Queensland.</p> <p>The JJR Group comprises the following entities:</p> <ul style="list-style-type: none"> <li>• Aztech Services Australia Pty Ltd (ASA);</li> <li>• In Vitro Technologies Pty Ltd (IVT);</li> <li>• J.J. Richards Engineering Pty Ltd (JJRE);</li> <li>• Steelfabrications Pty Ltd (SFA); and</li> <li>• Southern Oil Collections Pty Ltd (SOC).</li> </ul>	<p>The JJR Group as a whole provides a diverse range of goods and services globally, specifically;</p> <ol style="list-style-type: none"> <li>JJR and SOC performs a variety of solid, hazardous and liquid waste collection services, domestic garbage, recycling, sanitary and green waste collection services, including an extensive range of commercial customers;• In Vitro Technologies Pty Ltd (IVT);</li> <li>IVT is a distribution company specialising in the sale and support of scientific, clinical diagnostic, medial and related products; and</li> <li>SFA, JJRE and ASA provide various construction and demolition services.</li> </ol> <p>For a detailed list of JJR's operations, please refer to our website:  <a href="https://www.jjrichards.com.au/">https://www.jjrichards.com.au/</a>.</p> <p>Our website also provides a full list of our current divisions and affiliations</p>	<p>The JJR Group supply chain includes providers of the following:</p> <ul style="list-style-type: none"> <li>• Accommodation;</li> <li>• Administration Services;</li> <li>• Repair and Maintenance;</li> <li>• Builders;</li> <li>• Cleaners;</li> <li>• Hire Equipment;</li> <li>• Information Technology Services;</li> <li>• Insurance;</li> <li>• Labour Hire;</li> <li>• Mail Services;</li> <li>• Medical Professionals;</li> <li>• Professional Consulting Services;</li> <li>• Recruitment;</li> <li>• Removalists, Transporters;</li> <li>• Security Services;</li> <li>• Trucks, Vehicles, Wheeled Plant, Equipment; Fuel and Gas Suppliers;</li> <li>• Technical Specialists; and</li> <li>• Waste Collection/Haulage Organisations.</li> </ul>

# Our Modern Slavery Risks

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We have conducted a detailed risk assessment and evaluation to identify the risks of modern slavery in our overarching operations and supply chains. This was completed having regard and giving due consideration to the principles around same provided in the relevant guidance material.

The below categories of suppliers and subcontractors who provide products or conduct services for, or on behalf of the JJR Group were identified during this process as those who may be at a higher risk of modern slavery occurring in their supply chain:

- Companies (non-trade qualified) undertaking building maintenance on our sites – e.g. office cleaning, garden/yard maintenance;
- Companies (trade qualified) undertaking building maintenance on the JJR Group's sites – e.g. including electricians, plumbers, carpenters, roofers;
- Cleaning and detailing (non-trade qualified) of JJR vehicles – companies and/or professionals undertaking cleaning and detailing services of JJR vehicles;
- Information Technology (I.T.) services; and
- Labour Hire services.

## How we address these risks

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We confirm our zero-tolerance approach to modern slavery and commitment to reducing the risks of same in our supply chain. The JJR Group acknowledges the importance of providing practical steps to underpin our compliance by implementing various measures to continue addressing the risks of modern slavery in our operations, supply chains, and actions associated with same.

We are dedicated to providing an environment which enables us to monitor, manage and report on modern slavery in a way which ensures accountability and transparency across our entire corporate structure. As such, the JJR Group has implemented a multi-faceted approach to managing the risks of modern slavery in our operations including:

- A Whistle-blower Policy which can be used by internal and external stakeholders;
- Employment and Industrial Relations Policy;
- A due diligence program in relation to engaging with suppliers wherein high-risk suppliers are required to attest to having adequate protocols in place to respond to the risks of Modern Slavery; and
- Training and instruction of and to relevant staff.



## Assessing the effectiveness of our actions

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Overall, we are continually monitoring our risk profile and ensuring the JJR Group have appropriate controls in place to ensure compliance with the Act – which we consider to be imperative in upholding our Company Values which define the way we do things and the way we treat others. We continue to assess the effectiveness of these actions through:

- a. The establishment of a regular review process that involves sourcing, our People department and Legal team;
- b. Considering any trends in cases reported through grievance mechanisms; and
- c. Regularly checking our risk assessment processes to ensure that they remain up-to date.

## A review of our Modern Slavery response 2021

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Since the submission of the JJR Group's first MMS for the 2020 Financial Year, we have proactively assessed and reviewed our risk management processes to ensure that our compliance with the Act remains up-to-date. In particular, the JJR Group have:

- a. Reviewed our Modern Slavery Declaration which requires our high-risk suppliers to attest to compliance with the Act – in that review it was identified that no changes were required. However, our high-risk suppliers are prompted through our contractor management system to re-review and submit the declaration once annually. Since its introduction, no suspected or reported breaches of the Act have been identified by our suppliers;
- b. Reviewed our contracts which were updated to include contractual provisions requiring supplier compliance with the obligations of the Act. The JJR Group received a positive response from all suppliers, and have otherwise not been notified of any occurrences whereby our suppliers were reluctant to accept minimum contractual requirements relating to modern slavery;
- c. More broadly, undertaken an overall analysis of our supply chain by reviewing and identifying any necessary amendments to our categorised high-risk suppliers. The review by our Legal team did not identify any changes required; and
- d. Analysed the response and impact of COVID-19 (see below).

## Response and impact of COVID-19

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The guidance material in the Modern Slavery Act Information Sheet: Coronavirus (updated on 25 August 2020 and published by the Australian Border Force) has been considered by the JJR Group in response to the novel coronavirus (COVID-19) pandemic.

As an organisation, we have maintained a vigilant approach to ensuring that our suppliers, and supplier relationships are sustained during the unprecedented effects of the pandemic, including fostering open communication about COVID-19 risks. Internally, the JJR Group have also implemented measures to ensure our operations are continually informed of the developments of COVID-19, including prioritising the health, safety and wellbeing of our employees across all jurisdictions. As at the date of this MMS, the JJR Group's



operations have not been detrimentally impacted by COVID-19. However, as part of our ongoing compliance with the Act, we will continue to conduct regular reviews to ensure any substantial COVID-19 impacts are considered and reported on in the next financial year.

## Continuous improvement

The JJR Group are committed to the continual improvement of addressing modern slavery risks through its operations and supply chains. Through our identified actions defined above, we will continue to assess the effectiveness of same each financial year.

Next year, the JJR Group will introducing a more stringent contractor management system which is anticipated to provide us with greater protection in combatting the risks of modern slavery, prior to, and, during the course of engagement with our suppliers.

## How did we consult on this statement?

Our associated entities for the most part share Company Officers and have the same corporate system and advisory staff. This statement has been approved by the Board of Directors of J.J. Richards & Sons Pty Ltd on 23rd August 2021.



John Richards  
CEO - J.J. Richards & Sons Pty Ltd.



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Waste &  
Recycling

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