

Modern Slavery Statement

Financial year 2025

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Acknowledgement of Country

We acknowledge the Traditional Custodians of the lands across Australia. We honour the long history and celebrate the strength and resilience of Aboriginal and Torres Strait Islander peoples and communities past and present. We recognise and respect Aboriginal and Torres Strait Islander peoples' historical and ongoing connection to land and waters and pay our respect to Elders past and present.

1. Introduction

VicReturn Limited ABN 54 643 014 895 ('**VicReturn**', '**us**', '**our**' or '**we**') is a not-for-profit organisation appointed by the State Government of Victoria ('**State**') to coordinate Victoria's Container Deposit Scheme ('**CDS Vic**' or '**the Scheme**').

This statement is made under the *Modern Slavery Act 2018* (Cth) and sets out the actions taken by VicReturn to identify, assess and address modern slavery risks in our operations and supply chain during our financial year ending 30 June 2025 ('**FY25**'). VicReturn, as part of its program of work as Scheme Coordinator of CDS Vic, is committed to identifying and managing modern slavery risks in line with our risk management framework and commitment to industry best practice.

VicReturn recognises that modern slavery is a worldwide issue, and that to address the challenges of modern slavery within our operations and supply chains, collaboration with our business partners is needed. VicReturn is committed to ensuring that, as far as reasonably practicable, when developing policies, risk mitigation and compliance with regulatory requirements regarding modern slavery is considered.

2. Our structure, operations and supply chain

2.1. Structure

VicReturn is a company limited by guarantee, operating from Victoria. VicReturn was formed in 2020 for the purposes of bidding to become the coordinator of the Scheme by Lion Pty Ltd ABN 50 128 004 268, Coca-Cola Europacific Partners Pty Ltd ABN 26 004 139 397 and Asahi Beverages Pty Ltd ABN 51 004 243 994.

Along with directors from VicReturn's three founding companies, VicReturn's Board consists of an Independent Chair, an Independent Director and a director associated with small to medium-sized beverage manufacturers.

2.2. Operations

A. VicReturn's operations

VicReturn is a small not-for-profit organisation, with approximately 37 employees at 30 June 2025. VicReturn began operating during 2023 after being appointed as the Scheme Coordinator of the Scheme. Following the mobilisation and early establishment of CDS Vic during 2023, the Scheme has now been running in Victoria for over 24 months. FY25 represented VicReturn's first full financial year of Scheme operations.

VicReturn continues to be responsible for the governance and administration of the Scheme, handling the Scheme's financial operations, data collection, marketing, community education and integrity framework. Consequently, VicReturn operates a lean organisation comprising skilled professionals residing in Victoria.

In support of VicReturn's primary function, VicReturn's objectives are to:

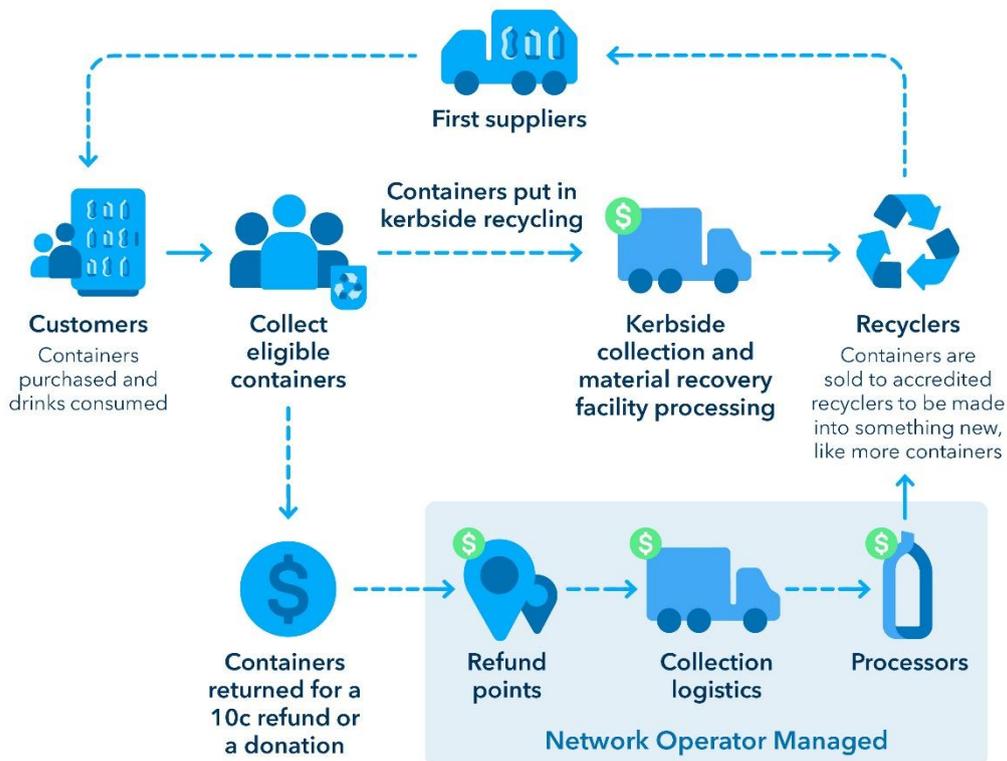
- Increase recovery and recycling of empty beverage containers
- Reduce the number of empty beverage containers that are disposed of as litter or landfill
- Ensure that first suppliers of beverage products take product stewardship responsibility
- Provide opportunities for social enterprise and benefits for community organisations
- Create opportunities for employment
- Complement existing collection and recycling activities for recyclable waste

VicReturn performs its duties as Scheme Coordinator under a Scheme Coordinator Agreement with the State of Victoria. Under this Agreement, VicReturn is subject to the Victorian Government Supplier Code of Conduct, requiring a commitment to ethical and legally compliant business operations.

B. VicReturn’s operations within CDS VIC

CDS Vic, as distinct from VicReturn, operates on a partnership model, where VicReturn, as Scheme Coordinator, is responsible for the governance and administration of CDS Vic. The Scheme’s zone operators, TOMRA Cleanaway, VISY and Return-It, oversee CDS Vic’s return points, refunds to customers and ensure proper recycling of the containers. The State regulates the Scheme to ensure efficient operation. Through a 10c refund for every eligible container returned, CDS Vic encourages Victorians to collect and recycle their containers, making a positive difference to our people, the environment and local industry.

CDS Vic makes it easy for everyone to participate. All Victorians - including families, community groups, charities, multi-unit dwellings and more - can bring their eligible beverage containers to a refund point and receive 10 cents per container in exchange. This refund can be kept or donated to one of our donation partners.



2.3. Supply chain

VicReturn's supply chain is limited, consisting of suppliers that provide goods and services to support our core function as Scheme Coordinator and to provide support for our technology, systems and infrastructure.

During FY25, the majority of VicReturn's suppliers were professional services providers that assisted VicReturn to manage the finances, advertising, community education, IT infrastructure, audit and oversight of CDS Vic. These professional services providers comprised most of VicReturn's supply chain both in numbers and percentage spend. During FY25, these providers comprised software and technology suppliers, marketing, advertising and communications specialists, content producers, event managers, finance and legal firms, and consultants specialising in audit, data analytics, and recycling. These providers are predominantly either subsidiaries of large businesses, with their own reporting obligations and processes in place to identify, assess and address modern slavery risks, or small-to-medium privately owned businesses with limited supply chain risk.

3. Risks of modern slavery in our operations and supply chain

Commensurate with FY25 being VicReturn's second financial year of operations and the Scheme's first financial year of activity, VicReturn continued to assess its exposure to modern slavery risks throughout the year. Building upon its preliminary review during FY24, VicReturn continually assessed its employment and staff management processes, and its partners and suppliers as VicReturn's operations have evolved

During FY25, VicReturn has identified that our operational risk of modern slavery remains low. We have employment contracts in place with all of our staff that meet legal requirements and monitor changes in relevant laws. In respect of our supply chain, we predominantly engage Australian-based professional services providers, advertising, marketing and communications specialists, IT suppliers and office equipment suppliers to support our business operations.

Additionally, to support VicReturn's Scheme marketing and awareness functions, VicReturn expanded its marketing activity during FY25 to include two new supplier categories:

A. Sponsorship agreements and partnerships

VicReturn entered into a number of partnerships with event providers and community, sporting and cultural organisations, ranging from elite sporting codes to municipal festivals. All partners were Victorian-based, not-for-profit organisations and developed in line with the Victorian Government's guidelines on sponsorship best practice. These partnerships sought to raise the Scheme's profile within the wider Victorian community, to build links with key stakeholders (such as schools and local sporting clubs) and to provide foreign-language translated material directly to communities.

B. Scheme branded merchandise, workwear and event infrastructure

To support its activity at events and to build community awareness, VicReturn commissioned Scheme-branded products, such as container bags, children's colouring pages, branded workwear, and branded event displays, which were distributed at events and to community groups. Suppliers of these products were required to ensure these items were sourced ethically, sustainably and manufactured locally.

While the spend on each of these new supplier categories is small, this does represent a shift in VicReturn supply chain profile.

Taking the above into account, as staff at VicReturn’s suppliers and partners are largely based in Melbourne, Sydney or other Australian capital cities, such providers, by their nature, have an overall low modern slavery chain risk profile due to operating in these locations (using [Walk Free’s Global Slavery Index](#)) and the maturity of their operations.

VicReturn acknowledges, however, that certain suppliers, despite having their main operations based in Australia, may indirectly expose VicReturn to a higher risk of modern slavery due to those suppliers having secondary supply chains located in higher risk locations. In such cases, VicReturn reviews those risks and puts in place mitigation measures before engaging such suppliers, set out in section 4.

FY25 Supply Chain Spend

Category	%	Profile
IT suppliers	44%	Managed software and systems providers based in Melbourne and Sydney that range in size. A small number of providers are larger global technology businesses with a small local presence. These businesses report on modern slavery through their own corporate group from the US or UK.
Advertising, marketing and media	30%	Marketing, advertising, design, content production and media-buying. These suppliers are predominantly small- to medium-sized professional services businesses based in Victoria and Sydney.
Professional services	13%	Consultancy services, covering legal, finance, accounting, people and culture, waste management, audit and integrity, and recycling. Predominantly Victoria and Sydney based that separately report in modern slavery risks.
Partnerships and engagement	9%	Sponsorships, promotional and awareness activity at public events in Victoria, and partnerships with Victorian community, sporting and cultural organisations.
Merchandise	2%	Scheme-branded merchandise for public awareness and promotion. Predominantly small local suppliers, with limited overseas manufacturing.
Office supplies, and rent	2%	Rent and property costs from Melbourne-based premises. Office supplies and catering purchased locally.

4. Actions taken to assess and address these risks

Similar to FY24, VicReturn continues to take a range of actions that seek to identify, assess and address modern slavery risks in our operations and supply chain.

4.1. Policies and procedures

A. Existing policy suite

VicReturn continues to maintain the formal policies and frameworks developed during FY23-FY24 that are intended to promote ethical and legally compliant business conduct. Those policies and procedures include:

- Employment Policy Handbook
- Code of Conduct Policy
- Whistleblower Policy
- Corporate Social Responsibility Policy
- Environment Management System
- Environment and Sustainability Policy
- Compliance Framework
- Delegation of Authority
- Remuneration compliance audit
- Fraud and Corruption Control Framework
- Risk Management Framework

The above policies, frameworks and associated procedural controls are reviewed periodically to ensure that VicReturn has robust processes in place to create a workplace that is ethical, socially responsible, transparent, commercially mature and environmentally conscious, and built upon strong foundations of corporate governance best practice.

The Employment Policy Handbook, Corporate Social Responsibility Policy and Code of Conduct Policy seek to ensure VicReturn's workplace environment and hiring practices reflect industry best practice. The Delegation of Authority requires every contract to be reviewed by internal legal counsel or, depending on the contract value, external legal counsel, and then approved by the Chief Executive Officer or another appropriate member of the Executive Team.

Additionally, VicReturn is required under the terms of its appointment by the State to comply with the Victorian Government Supplier Code of Conduct and to prefer Victorian local suppliers, social enterprises and social benefit suppliers.

B. Sourcing Framework

VicReturn took major steps to improve its processes for the review, assessment and mitigation of its suppliers. As prefaced in VicReturn's FY24 Modern Slavery Statement ('**FY24 Statement**', refer section 7), VicReturn implemented a 'Supplier Framework' and an internal online supplier engagement tool (discussed in section 4.2 below).

The Supplier Framework outlines the minimum expectations and processes that VicReturn staff must meet when procuring goods and services and the processes for engaging suppliers and partners. Synthesising the principles and objectives in other core VicReturn policies (refer 4.1.A above), the Framework requires staff to select suppliers carefully, act ethically, and proactively identify risk throughout the supplier engagement journey.

Practically, the Framework establishes mandatory reviews of each new VicReturn supplier or partner by requiring VicReturn staff to submit their contract or invoice for review through an online portal (discussed in section 4.2 below).

4.2. Due diligence processes and compliance requirements

A. Supplier Requests and Review

As noted above, the implementation of VicReturn's Sourcing Framework established that, prior to engaging a supplier or partner, every new supplier must be subject to:

- (a) Supplier due diligence by the staff member requesting the engagement
- (b) Legal review and, if required, contract negotiation by the Head of Legal
- (c) Stakeholder review (e.g., IT, Audit and Risk, Marketing, Communications and Engagement, People and Culture and Finance)
- (d) Executive staff and Chief Executive Officer approval; and
- (e) Contract signing and storage.

To support these steps, VicReturn established an online tool, whereby staff submit a 'Supplier Request Form', attaching a proposal and the contract or invoice. Initial requests are reviewed by the Head of Legal and referred to stakeholder assessment as determined by the Framework and by the relevant subject matter of the proposal.

Consistent with VicReturn's practices during FY24, each supplier engagement is risk-assessed by the relevant contract manager, along with review by the finance team and legal counsel before the supplier or partner is approved or paid. These risk-assessments may include an assessment of modern slavery risk as relevant to the particular supplier, and goods or services supplied.

B. Compliance and Mitigation Measures

As noted in section 3, VicReturn has assessed its supply chain as largely low risk, given the predominant location and nature of its suppliers. However, as a minimum risk mitigation measure, VicReturn requires all contracts with its suppliers to be on reasonable commercial terms and include provisions to mitigate VicReturn's supply chain risk, through either VicReturn standard contract templates or legal review of supplier contract terms to include legal compliance obligations.

Where, as noted above, where VicReturn has assessed that it may be exposed indirectly to modern slavery risks due to the nature of the services supplied, a particular supplier's operations and secondary supply chain. Further steps may include:

- (f) Referral to VicReturn's Audit and Risk Team;
- (g) Requiring the supplier to complete a Due Diligence Questionnaire prepared in accordance with the Victorian Government's Supplier Code of Conduct;
- (h) Obtaining third party assurance reports in respect of the supplier; and
- (i) Working with the locally based supplier to seek assurance in respect of the particular goods and services.

4.3. Our people

VicReturn is committed to fostering a workplace culture that promotes diversity, equity, inclusion and belonging (DEIB) in all aspects of our operations. We believe that embracing diversity enriches our work environment and enhances our ability to achieve our mission.

All of our staff are engaged on legally compliant Australian employment contracts.

We affirm our commitment to:

- Providing equitable employment opportunities for all individuals based on merit and without discrimination.
- Creating a workplace that respects and values differences in race, ethnicity, gender, sexual orientation, age, disability, religion, and socio-economic background.
- Fostering an inclusive environment where all employees feel respected, supported, and able to fully contribute.
- Proactively addressing discrimination, harassment, and barriers to inclusion within our company

4.4. Our Values



Sustainability

We believe that a circular economy can truly transform Victoria's environment. Through recycling drink containers, we can secure a cleaner ecosystem.



Collaboration

We value the importance of partnerships to achieve the best social, environmental, and commercial results for all.



Impact

We care about what we do and work with purpose and integrity. We're driven by the opportunity to create positive change for all Victorians.

4.5. Risk Management

Risk management plays a critical role in understanding and managing risks and uncertainties in the design and operation of each of VicReturn and the Scheme, including safeguarding Scheme funds, protecting people and the environment, and building and maintaining public trust and ongoing adoption.

VicReturn continues to oversee the implementation of the Scheme Risk Management Framework, in alignment with the International Risk Management Standard (ISO31000: 2018). The Scheme Risk Management Framework is made up of several components designed to effectively manage risk, including a risk management policy statement that outlines the principles for effectively managing risk across the Scheme, a VicReturn Risk Appetite Statement that defines acceptable levels and thresholds for risk taking in line with VicReturn's objectives, and detailed processes for the identification, assessment, and management of both strategic and operational risks within VicReturn and throughout the Scheme. These processes ensure that potential risks are identified early, assessed for their impact, and mitigated through tailored strategies, allowing for proactive risk management.

In collaboration with Scheme Participants, VicReturn has also established a Scheme Fraud and Corruption Control Plan in line with the Australian Standard: Fraud and Corruption Control 8001-2021. The Plan provides a set of commitments and implementation actions by Scheme Participants, including VicReturn, to assist in the prevention, detection and response to Fraud and Corruption Risks. The plan includes several requirements including fraud and corruption control principles, the Scheme's attitude to fraud and corruption, and expectations of Scheme Participants with respect to ethical policies and procedures, training and awareness, fraud and corruption risk assessments, whistleblowing and investigation processes, and regular auditing of fraud and corruption control environments.

5. Remediation process

Following VicReturn's review and compliance processes (refer 4.2 above), we did not become aware of any modern slavery risks or incidents during FY25.

However, if VicReturn became aware of a modern slavery risk in our operation or supply chain, we would expeditiously take all relevant steps to remove and / or reduce the risk, which may include terminating our contract with a supplier.

Our Whistleblower Policy provides our staff with an avenue to raise issues, including issues concerning modern slavery, should any risks or incidents arise.

6. Measuring the effectiveness of the actions taken

VicReturn, along with its Board of Directors, is committed to continuous improvement, recognising the importance of monitoring and assessing the actions that we have implemented to determine their effectiveness. VicReturn applies the same approach to its current policies and procedures for managing the risk of modern slavery in its operations and supply chain. Reporting channels and open lines of communication exist between key members of the Executive including the Head of Legal and Chief Executive Officer, to ensure that our actions are continually assessed and enhanced, as we develop a better understanding of the effectiveness of our existing framework.

In its F25 Statement, VicReturn acknowledged that it was a relatively new organisation with room to grow. For this reason, VicReturn stated that its priorities during FY25 were:

- *The development of a VicReturn Sourcing Framework and Supplier Code of Conduct;*
- *Mandatory supplier due diligence as a requirement of the VicReturn Sourcing Policy, using a risk-based matrix that considers, among other criteria, the nature of the goods or services procured and the location of the supplier; and*
- *An internal VicReturn online supplier engagement tool, which will document the accountability for supplier approval, engagement and review by VicReturn staff.*

As noted in section 6, VicReturn substantially delivered on these commitments, implementing a Supplier Framework and online supplier engagement tool, which, together, require staff to undertake mandatory supplier due diligence and mitigation measures prior to engaging suppliers.

While these initiatives were positive developments for VicReturn during FY25, following a review of VicReturn's business operations, VicReturn's will develop a Procurement Policy during FY26 that will govern the entire supplier and partnership journey, covering procurement, tendering requirements, finance processes and management delegations.

As a result, the principles and processes set out in the Supplier Framework, including the online tool, will be incorporated into the Procurement Policy. Additionally, while a draft 'Supplier Code of Conduct' was prepared during FY25, that document was not released within VicReturn, as it will be incorporated into the Procurement Policy in FY26.

7. Future commitments

VicReturn is committed to refining the way in which risks of modern slavery are identified, assessed and mitigated.

As noted in section 6 above, VicReturn's major priority for FY26 is to develop a Procurement Policy, which will include a supplier Code of Conduct or similar statement of minimum expectations.

8. Consultation

This statement was developed with the input of relevant members of VicReturn's senior management team and Executive.

VicReturn does not own or control any other entities and therefore did not consult with any other entities in the preparation of this statement.

Approval

This statement was approved by the Board of Directors for VicReturn Limited on 11 December 2025.

Signed by:

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Freya Marsden
Chair
15 December 2025

Signed by:

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Marianne Doyle
Interim Chief Executive Officer
15 December 2025