



## FY23 MODERN SLAVERY STATEMENT

This Modern Slavery Statement covers the activities of Container Exchange (QLD) Limited ACN 622 570 209 (**COEX**) during the financial year that ended 30 June 2023 (**FY23**) to identify and mitigate any potential modern slavery risks in COEX's operations and supply chain.

### Introduction

The Queensland Government appoints COEX as the not-for-profit organisation responsible for implementing, managing, and advancing the Container Refund Scheme 'Containers for Change' in Queensland (**Scheme**). The Scheme is authorised under the *Waste Reduction & Recycling Act 2011* (Qld), and COEX reports to Queensland's Minister for the Environment and the Great Barrier Reef, Minister for Science and Minister for Multicultural Affairs.

As of June 30, 2023, COEX manages a network of 362 collection refund points (**CRPs**) across Queensland, incorporating depots, reverse-vending machine depots, bag drops and pop-ups, with 86 independent operators contracted to run the CRPs in the Scheme.

As an Australian business generating annual revenue in excess of AU\$100 million, we acknowledge that COEX is required to publish an annual Modern Slavery Statement, in accordance with Section 13 of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). This is COEX's Modern Slavery Statement, which we have prepared in relation to FY23 (**FY23 Modern Slavery Statement**).

In this FY23 Modern Slavery Statement:

1. Modern Slavery refers to situations of 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
2. Modern slavery risk refers to the prospect of a practice involving modern slavery occurring in a business's operations and/or supply chain.

### Position Statement

COEX will not accept the existence of any form of modern slavery in connection with our business. We recognise our responsibility to work with our members, 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.

### Our Organisational Structure

COEX is an Australian public company limited by guarantee. COEX has two members, Coca-Cola Europacific Partners Australia Pty Ltd ACN 076 594 119 and Lion Pty Ltd ACN 128 004 268. COEX's registered office is Level 17, 100 Creek Street Brisbane, Queensland, 4000.





COEX is not part of a larger corporate group of entities and does not own or control other entities.

## Our Business

### Operations

COEX is the not-for-profit organisation responsible for implementing, managing, and advancing the Scheme in Queensland. COEX employs approximately 64 people and manages approximately 140 independent contracts, including CRP operators, processing (sorting) of containers, logistics between CRPs, processors and sale of recyclable materials. For further information about COEX's operations, please refer to COEX's website ([www.containerexchange.com.au](http://www.containerexchange.com.au)).

### Supply Chain

Category	Details
Technology used in the Scheme	Consistent with standard commercial practice, COEX facilitates procurement of technology for use in its operations.
Outsourced back-office services	COEX has a services agreement with Container Exchange (Services) Pty Ltd ACN 623 565 471 ( <b>CES</b> ) to provide certain services, including accounts payable and customer call centre support.
Customers (Suppliers)	COEX receives containers sold for consumption in Queensland, from persons presenting such containers for deposit at a CRP.
Operators (various)	COEX contracts with numerous operators for various purposes, including but not limited to, CRP operations, processors, and logistics.

## Our Approach, Risk Assessment & Mitigation Plan

### Approach

In preparation for compliance with the Modern Slavery Act (including publication of this FY23 Modern Slavery Statement), COEX's Management:

1. Conducted an assessment of the modern slavery risks which are presented by COEX's unique operations and supply chain (**Risk Assessment**); and





2. Took various actions, to mitigate the potential modern slavery risks, which COEX identified as part of the Risk Assessment (**Actions**).

Further details of the potential modern slavery risks that COEX identified as part of the Risk Assessment and the Actions we took to mitigate those modern slavery risks are outlined below in this FY23 Modern Slavery Statement.

### Risk Assessment – Potential modern slavery risks

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

Business area	Modern Slavery Risk	Description of Modern Slavery Risk
Operations	Commodity risks	The recyclable commodities that COEX collects are sold to buyers who (directly or indirectly) engage in any practices that might be considered to constitute modern slavery.
Operations & Supply Chain	Workforce risks	That any person in COEX's workforce or operators' workforce is subject to any conditions which might be considered to constitute modern slavery.
Supply Chain	Supply chain risks	<p>There are modern slavery risks in the operations and/or supply chains of COEX's various contractors and suppliers:</p> <ul style="list-style-type: none"> <li>• supply of technology – the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk due to the technical nature of these goods and the strong reputations of the supplier (being CES);</li> <li>• specialist logistics service providers – the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, given that COEX's various service providers are well-reputed professionals in their respective fields and are physically located in Australia; and</li> <li>• collection point partners – the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, given that COEX's contracted partners are large and small businesses and community organisations physically located in Australia.</li> </ul>



Business area	Modern Slavery Risk	Description of Modern Slavery Risk
		<ul style="list-style-type: none"> <li>Material Recovery Facility operators – These contractors are paid recovery amounts for containers recovered through their contracted services with the local councils. The Risk Assessment concluded that material recovery activities performed by these facilities present low modern slavery risk.</li> <li>Processors - the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, given that COEX's contracted partners are large and small businesses and community organisations that are physically located in Australia.</li> </ul>

#### Actions – Mitigation of potential Modern Slavery Risks

During FY23, COEX took the following actions to mitigate the potential of Modern Slavery risks identified as part of the Risk Assessment (see above).

Business area	Modern Slavery Risk	Description of Modern Slavery Risk
Operations	Commodity risks	<p>Due diligence checks are performed on all buyers before providing access to purchase material.</p> <p>Regular risk-based audits are performed across multiple purchasers.</p> <p>With the introduction of the waste export ban through the <i>Recycling and Waste Reduction Act 2020</i> (Cth), many purchasers of Scheme material are required to obtain a waste export license.</p>
Operations & Supply Chain	Workforce risks	<p>Scheme material, used in eligible beverage containers, is supplied by the Queensland public and limited to beverages sold for consumption within Queensland.</p> <p>Our terms and conditions prohibit accounts by children under the age of 13 years. Parental consent is required for individuals between 13 and 18 years of age.</p>

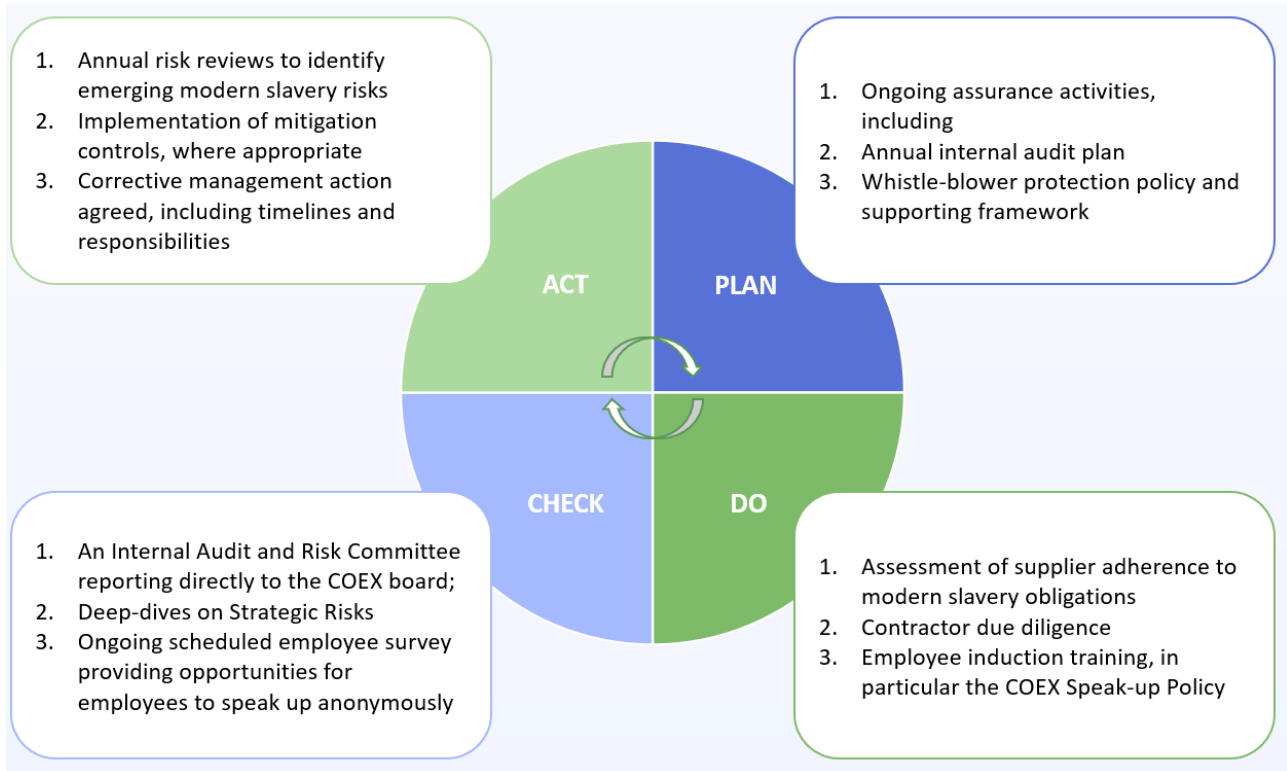


Business area	Modern Slavery Risk	Description of Modern Slavery Risk
		<p>While being independent operators, all parties in the supply chain are Australian entities (Container Refund Point Operators (<b>CRPOs</b>), Logistics providers, and Processors) and are both legislatively and contractually required to adhere to all Australian laws, including all Work Health and Safety (<b>WHS</b>) and Modern Slavery laws.</p> <p>Multiple avenues for whistleblower disclosures are available for anonymously reporting suspected breaches of legislation and ‘an improper state of affairs’. No disclosures concerning modern slavery have been reported.</p>
Supply Chain	Supply chain risks	<p>An Australian entity provides backend technology infrastructure and is legislatively and contractually required to adhere to all Australian laws, including WHS and Modern Slavery laws.</p> <p>The logistics industry is a heavily regulated industry with specific requirements for modern awards for payment to workers and is limited to licence holders; as such, there is nil risk to child labour and limited risk to modern slavery.</p> <p>The Queensland public is the ultimate supplier of Scheme material, eligible for used beverage containers.</p> <p>Eligibility is directly related to the provenance of material, i.e. being sold for consumption in Queensland or a corresponding domestic jurisdiction.</p>

## Assessing the Effectiveness of Our Actions

COEX has an ongoing assessment process to measure and improve its culture of identifying and remediating modern slavery in its supply chain. COEX monitors for any incidents of modern slavery through its risk assessments and audit processes. These measures for FY23 include steps to plan, do, check and act:





COEX takes its responsibility to identify and remediate modern slavery very seriously and will continue to work on developing its frameworks and processes to improve its review of the effectiveness of its actions to assess and address current slavery risks in its operations and supply chains.

## Consultation Process

This statement was prepared in consultation with internal stakeholders of COEX. COEX does not own or control other entities, and therefore sections 14 and 16(1)(f) of the Modern Slavery Act do not apply.

## Our Plans for FY24

During FY24, COEX plans to review the identification (and mitigation) of potential modern slavery risks, prioritising our activities based on:

1. COEX has determined and will continue to identify, in the future, potential risks related to modern slavery that may apply to our operations and supply chain.
2. The identification (and mitigation) of any new modern slavery risks that arise in COEX's operations and/or supply chain and





3. Review COEX's modern slavery risk management approach in line with the *UN Guiding Principles on Business and Human Rights* and mandatory reporting criteria of the Modern Slavery Act 2018.

This FY23 Modern Slavery Statement has been approved by the Board of Directors of Container Exchange (QLD) Limited.

**Signed**

DocuSigned by:  
*Andrew Clark*  
A1B28FEE65854EF...

---

**Andrew Clark, Chair**  
Container Exchange (QLD) Limited

**Date:** 26 November 2023

