



MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2023



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ACKNOWLEDGEMENT OF COUNTRY

ResourceCo acknowledges the Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the lands on which we work and live. We pay our respects to their cultures, Elders past and present and honour their continuing connection to land, waters and community.

Criteria 1

This modern slavery statement is produced by ResourceCo Holdings Pty Ltd ACN 107 343 288 ("ResourceCo") on behalf of the entities that it owns and / or controls ("ResourceCo Group") for the financial year ended 30 June 2023.

This modern slavery statement is produced in accordance with the Modern Slavery Act 2018 (Cth) ("the Act") and outlines what ResourceCo has done to identify, address and mitigate modern slavery risks within its operations and supply chains.



FY23 HIGHLIGHTS



RISK ASSESSMENTS



SCREENINGS UNDERTAKEN



QUESTIONNAIRES ISSUED



SUSTAINABILITY COMMITTEE CONVENED



SUSTAINABILITY STRATEGY IMPLEMENTED



MODERN SLAVERY TRAINING OF RISK OWNERS



BROADER EMBEDDING OF MODERN SLAVERY COMPLIANCE



PLANNING FOR SUPPLY CHAIN TRACING IN FY24

ABOUT US

ResourceCo is a leader in the transition to a circular economy with over thirty (30) years of experience of transforming waste that is destined for landfill into valuable products, enabling existing products and materials to be repurposed and given a new life.

Since 1992, we have been a pioneer in resource recovery across Australia and South-East Asia with over 60 million tonnes of waste materials re-purposed as a result of our operations. Additionally, we were the first company in Australia to be registered under the Emissions Reduction Fund (ERF) and are one of the largest contributors to carbon abatement in Australia. Our customers include governments, communities and multinational companies who utilise our operations to ensure that resources already in use are re-purposed and given a new life.

Through our operations, we are playing a leading role in the global expansion of resource recovery and the circular economy whilst supporting the net zero aspirations of many organisations through the provision of sustainable supply chain options. As a leader in the resource recovery and circular economy space, we have helped to divert materials from landfill and in doing so, avoiding CO2 (and other GHG Emissions) and creating significant circular economy carbon abatement.

The circular economy is pivotal to meeting Australia's emissions reduction goals under the Paris Agreement as codified in the Climate Change Act 2022 (Cth) as it works as a form of carbon abatement.

Circular Economy (noun) – a system of business models and practices that ensures sustainable materials management. A circular economy reduces primary material requirements, optimises processes and products for lower material and waste intensity. It therefore allows value adding to material to occur multiple times across their life cycle.

Our focus on progressing the circular economy goes hand in hand with our goals to have a sustainable, ethical supply chain in our own operations. Our Sustainability Report for the 2022 calendar year outlines our initiatives in turning waste materials into high quality products and the contributions that we have made to carbon abatement and the circular economy in Australia during the year.

Some of the highlights that we outlined in our Sustainability Report include:

- 4.61 million tonnes of resources recovered in 2022.
- Average of 83% diversion rate from landfill.
- Investment in glass recycling plant.
- New resource recovery site established in Brooklyn, Victoria.
- 64,159 Australian Carbon Credit Units (ACCUs) generated.



Vision and Values

ResourceCo operates on the four (4) core values of sustainable, committed, creative and agile. These foundational values help us to meet our vision of leading the way in resource recovery, the development and use of innovative technology and our contribution to emissions reduction through carbon abatement.



SUSTAINABLE

We are in the business of resource recovery — transforming waste into usable products. We are focused on preserving the planet’s limited resources, both for today and future generations.



COMMITTED

We are committed to consistently delivering on our brand promise and going the extra mile to get the job done, ensuring we leave a positive legacy.



CREATIVE

Creativity is part of our DNA, embedded in the actions of our executive, employees and business partners. We challenge the way we operate to drive progress towards a circular economy.



AGILE

We are dynamic and responsive, acting with speed and nimbleness in providing innovative solutions for our customers and stakeholders.

We have been a member of the United Nations Global Compact (“UNGC”) since 2021. We are committed to playing our part to operate in a way that, at minimum, meets the fundamental responsibilities of the ten (10) principles of the UNGC. In particular, we focus on principles in the areas of human rights, labour, environment and anti-bribery and corruption.

Through the UNGC, we have adopted their principles-based framework, best practices, and resources to align our business with businesses around the world to accelerate and scale the necessary global collective impact in line with the UN Sustainable Development Goals (“SDG’s”).

We support and prioritise the implementation of the SDG’s throughout our entire business model and are committed to working towards achieving the SDG’s through our own business operations and assisting our customers in doing the same.

As a responsible business doing our part in progressing the circular economy, the principles of sustainable development are incorporated into our business model, strategies, policies and procedures alongside our broader focus on establishing a culture of integrity to ensure that our responsibilities towards our people and planet are met. Our approach to our business is reflected in our brand promise: We have an obligation to leave the planet in a better state than we found it. We will not rest until we do!

The below Priority Goals are five (5) SDG’s that we have chosen to focus on across our business. Continually prioritising and undertaking pro-active action to have a sustainable and ethical business model and supply chains, undertaking action on climate change and promoting inclusive and sustainable industrialisation assists in mitigating modern slavery risk.

Priority Goals



Goal 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation.



Goal 11: Make cities and human settlements inclusive, safe, resilient and sustainable.



Goal 12: Ensure sustainable consumption and production patterns.



Goal 13: Take urgent action to combat climate change and its impacts; and



Goal 17: Strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development.

Message from the Managing Director



OUR BRAND PROMISE – TO MAKE SURE WE LEAVE THE WORLD IN A BETTER PLACE THAN WE FOUND IT RESONATES ACROSS OUR BUSINESS FROM RESOURCE RECOVERY THROUGH TO ADVANCED MANUFACTURING THROUGH TO OUR PEOPLE AND PROCESSES.

ResourceCo has for the past 31 years grown in scale with sustainability being the heart of the business. Our current growth strategy is designed to position us as a global leader in resource recovery.

With increasing scale and complexity, our approach and discipline to ensure we grow with the right people and processes, aligned to our values is a massive focus for ResourceCo across Australia and Asia. It is our commitment to the communities within which we operate to respect human rights across our business value chain.

We are conscious of the inherent risks associated with our current business growth. Whilst acknowledging that our approach is still evolving, we are proud of the work we have done to build a respectful culture and awareness of our role in respecting human rights.

A firm commitment to respecting human rights is at the heart of how our business operates, delivering on our purpose. It is our endeavour to secure a sustainable global supply chain and create value for all our stakeholders.

Our Sustainability Report for the Calendar Year 2022 and our FY22 Modern Slavery Statement highlights our ongoing commitment to global efforts to mitigate modern slavery. We acknowledge the critical role of our business operations for the communities that we work in. That is why we have further embedded a strong culture of a consultative approach to work together with all stakeholders for the best outcome.

In today's context of global challenges, driven by business necessities and growing social expectations, we are even more conscious of the impact of our suppliers across our business. This report details our approach this year with continuous improvement to the way we create awareness and together work towards desired outcomes.

During the next financial year, we are taking a critical look at further improving our approach to modern slavery including spend thresholds, supplier audits and working together with our employees and suppliers to identify any risks deeper in our supply chains.

Simon Brown,
Managing Director, ResourceCo



Criteria 2

OUR STRUCTURE

ResourceCo is a private company and is the parent company of a group of controlled entities which operate in the resource recovery, waste management, remanufacturing of waste and energy sectors. The ResourceCo Group is managed from our head office at 162 Fullarton Road, Rose Park SA 5067.

We are committed to maintaining and improving our existing systems and processes to mitigate any modern slavery risks within our own operations and our supply chains.

We employ a total of 577 full time and part time employees across Australasia. This is a 25% increase in employees from FY22.

RESOURCECO MATERIAL SOLUTIONS PTY LTD

Our Material Solutions business recorded revenue over \$100 million AUD during the financial year. The business delivers Soil Reuse and Recycling solutions to a range of customers across our business operations including complete material supply, reuse, transport and disposal solutions for site remediation, rehabilitation and development projects.

The business operates across all market sectors including residential, industrial, commercial and major infrastructure projects.

The Soil Reuse and Recycling business (ResourceCo Material Solutions) employs over 101 full time part time and contractors (93 employees in FY22) with a massive network of subcontractors.

During the financial year 2023, we have ensured focused training of our employees to identify any potential risks in the supply chain and ongoing monitoring of suppliers.

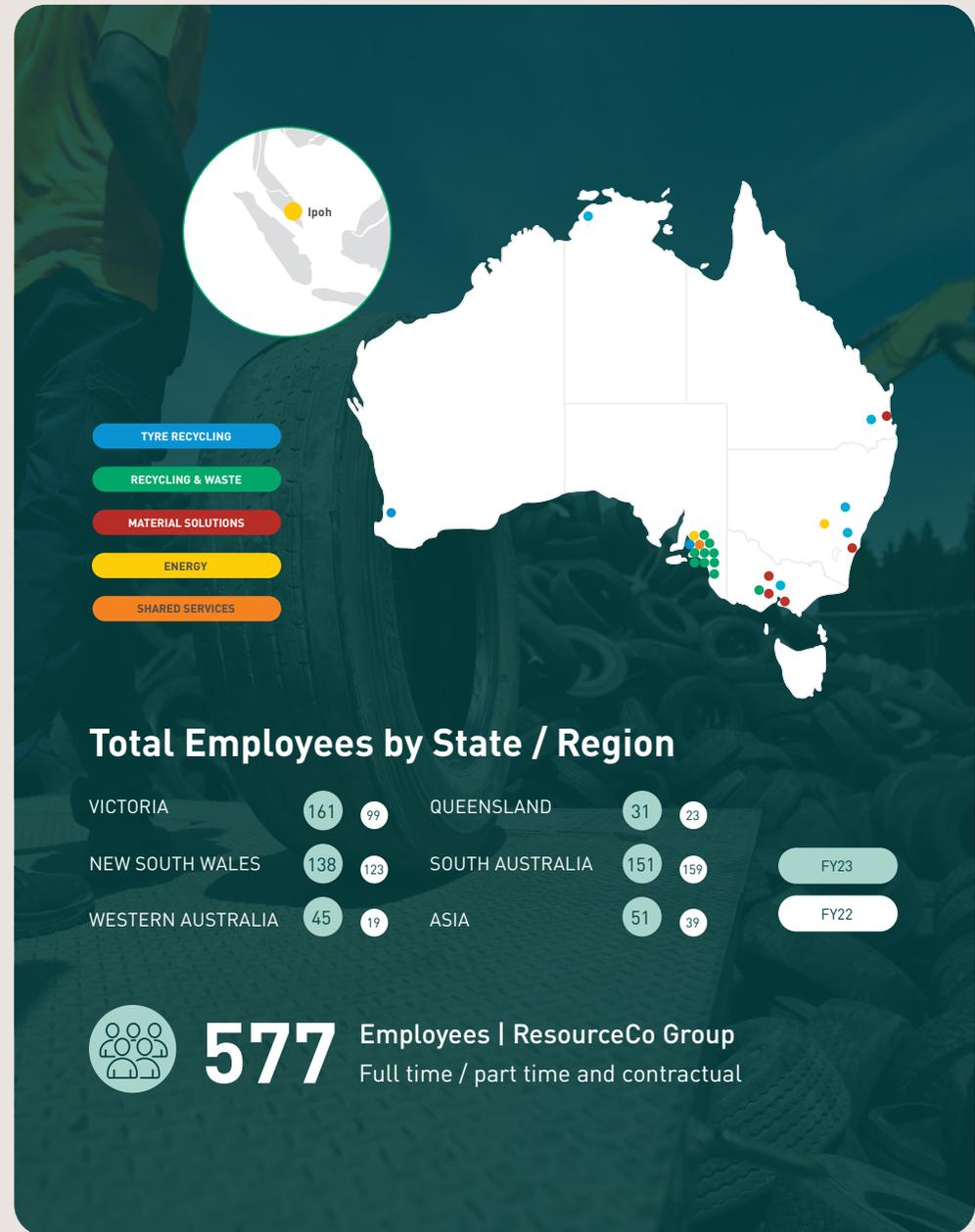
Material Solutions commenced operations in 2013 as a part of ResourceCo Group and is now a leading integrated soil recycling business in VIC, NSW, QLD and SA.

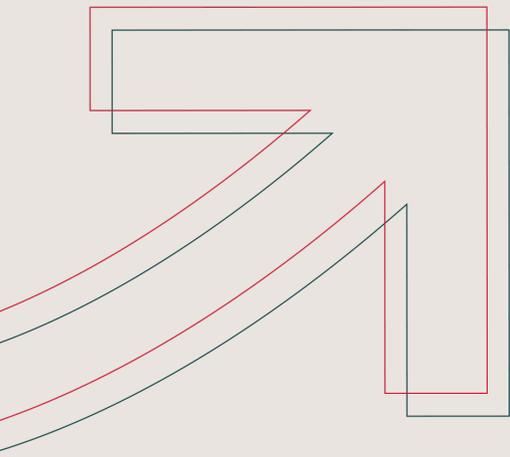
REVENUE FY 2022: \$91.4 MILLION

93 EMPLOYEES

REVENUE FY 2023: \$112.5 MILLION

101 EMPLOYEES





OUR OPERATIONS

Our operations span across our five (5) business pillars of Tyre-Recycling, Soil, Reuse and Recycling, Recycling and Waste, Energy and Shared Services. We have sites across Australia and South-East Asia (Malaysia).

This year we opened a new resource recovery site in Brooklyn, Victoria. This site processes a variety of products including soils, concrete, rock, brick, asphalt, and timber. This site has been able to expand our product offerings in our integrated recycling capabilities beyond our existing construction and demolition (C&D) material capabilities. We have also invested in a new glass recycling plant in Wingfield, SA. This will enable us to have the capability to convert “dirty glass” into sand to be used in drainage or road construction.

TYRE RECYCLING (TYRECYCLE)

TyreCycle has continued to deliver strong environmental and economic outcomes by repurposing the rubber from tyres which would otherwise have been discarded in landfill. Across Australia we have seven (7) tyre recycling facilities which collect in the order of 17 million tyres per annum with a recycling rate of 99% of tyres collected.

The repurposed materials that are created from these recycled tyres and used locally and globally. For example, our tyres can be used to:

- create athletic and playground surfaces;
- produce tyre derived fuel (TDF); and
- construct roads using recycled rubber crumb asphalt.

Fro the 2022 calendar year, we collected over 17 million tyres and produced over 113,499 tonnes of tyre derived fuel and 17,496 of rubber crumb. Our capacity has increased since the opening of our Erskine Park site in Western Sydney which will further increase with the impending opening of our Perth processing plant and the Port Hedland recycling facility.

SOIL REUSE AND RECYCLING

Soil Reuse and Recycling adds value to discarded values that would otherwise be disposed by capturing and re-purposing structural materials such as mudstone and clay that are reused in the civil construction sector, fill materials that are reused in rehabilitation projects and excavated sands and topsoil that are recycled into valuable landscaping products. We also sort, treat and screen physically and chemically contaminated soils to extract valuable products and maximise diversion from landfill.

Within this business pillar, we provide sustainable material solutions and deliver complete material supply, transport and disposal services for site remediation, rehabilitation and development projects. We collaborate with First Transport, which is a leading indigenous owned earthmoving company to transport materials recovered from our sites. We have a 77% resource recovery rate for our recovered materials and provide our clients with live tracking so that customers have visibility on the pickup and disposal of materials.

RECYCLING AND WASTE

We collect and process construction and demolition waste materials consisting of asphalt, concrete, bricks and rubble and give these materials another life through the creation of recycled aggregated and recycled asphalt products. We have repurposed around 2 million tonnes of materials so far which would have otherwise been destined for landfill.

The opening of our Brooklyn site has enabled us to expand our recycling and waste capabilities into Victoria. We have also invested in a glass recycling plant in Wingfield, South Australia which will again increase our recycling capabilities.

ENERGY

Our energy business is built on the belief that developing alternative fuel sources to fossil fuels is integral to sustainability and protecting the environment. This function of our business accepts Construction & Demolition and Commercial & Industrial waste streams and transform this waste into Process Engineered Fuel (“PEF”).

Our Resource Recovery Facilities in NSW, SA and Malaysia collect and use residual timber, paper, plastic and cardboard waste to produce PEF. Through this, we service high energy users where PEF is consumed for energy production. As PEF has a lower emissions profile than traditional fossil fuels, the production of PEF helps to abate hundreds of thousands of tonnes of CO2. We have committed to develop a \$50 million waste to energy facility in Hemmant, Queensland to further expand our energy business pillar.

SHARED SERVICES

Our shared services business provides strategic direction and support to the ResourceCo Group. This includes finance, treasury, strategy, human resources and corporate development functions.

Having a shared services department across all of our business functions brings consistency to our operations.

Accordingly, we can deliver on stakeholder expectations with a positive impact on environmental, social and economic outcomes with this shared understanding across all of our business pillars which facilitates growth for every aspect of our business.

RESOURCECO ASIA

ResourceCo operates a resource recovery facility in Ipoh, Malaysia and our broader Asian operations provides sales and marketing support for our products generated by Cleanaway ResourceCo and Tyrecycle.

We acknowledge that there are inherent modern slavery risks associated with operating in Malaysia. This is further described Criteria 3 below.

Our Asian office offered all political participants in the most recent election an option to secure a “Zero Waste Solution” for their discarded campaign materials. This signage, which is typically synthetic, non-biodegradable, heavy on dyes and is challenging to recycle, meaning that most end up in landfill. Instead, these materials were processed and re-purposed into PEF.

SUPPLY CHAINS

In FY23, we had a supply chain spend of \$279,160,328.41 across more than 404 suppliers¹.

FY23	FY22
SPEND \$279 MILLION	SPEND \$244 MILLION
SUPPLIERS 2,403	SUPPLIERS 2,200
INTERNATIONAL SUPPLIERS 2%	INTERNATIONAL SUPPLIERS 2%
AUSTRALIAN SUPPLIERS 98%	AUSTRALIAN SUPPLIERS 98%

In this reporting period, we engaged with 98% Australian suppliers. We focus on engaging local Australian suppliers to provide us with services and products to enable our business pillars to carry out their various functions. We also focus on engaging suppliers who we can maintain long term and stable relationships with to enable us to meet customer and stakeholder demand.

In this reporting period, 98% of our suppliers are long term suppliers and 2% of suppliers were new suppliers.

Our top 5 suppliers have been with us prior to ResourceCo becoming a reporting entity under the Act:

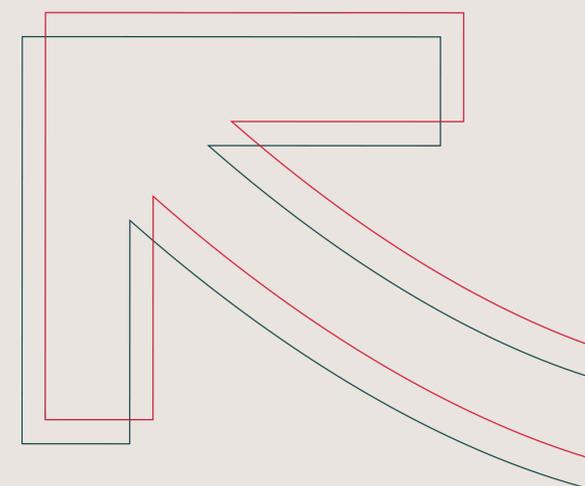
RANK	SPEND	TIME WITH RESOURCECO ²
1	\$12,515,374.90	1.5 YEARS +
2	\$9,557,613.85	1.5 YEARS +
3	\$9,427,988.55	1.5 YEARS +
4	\$8,466,542.08	1.5 YEARS +
5	\$6,175,942.29	1.5 YEARS +

Our suppliers are primarily based in Australia, with our other international suppliers based in India and Sweden.

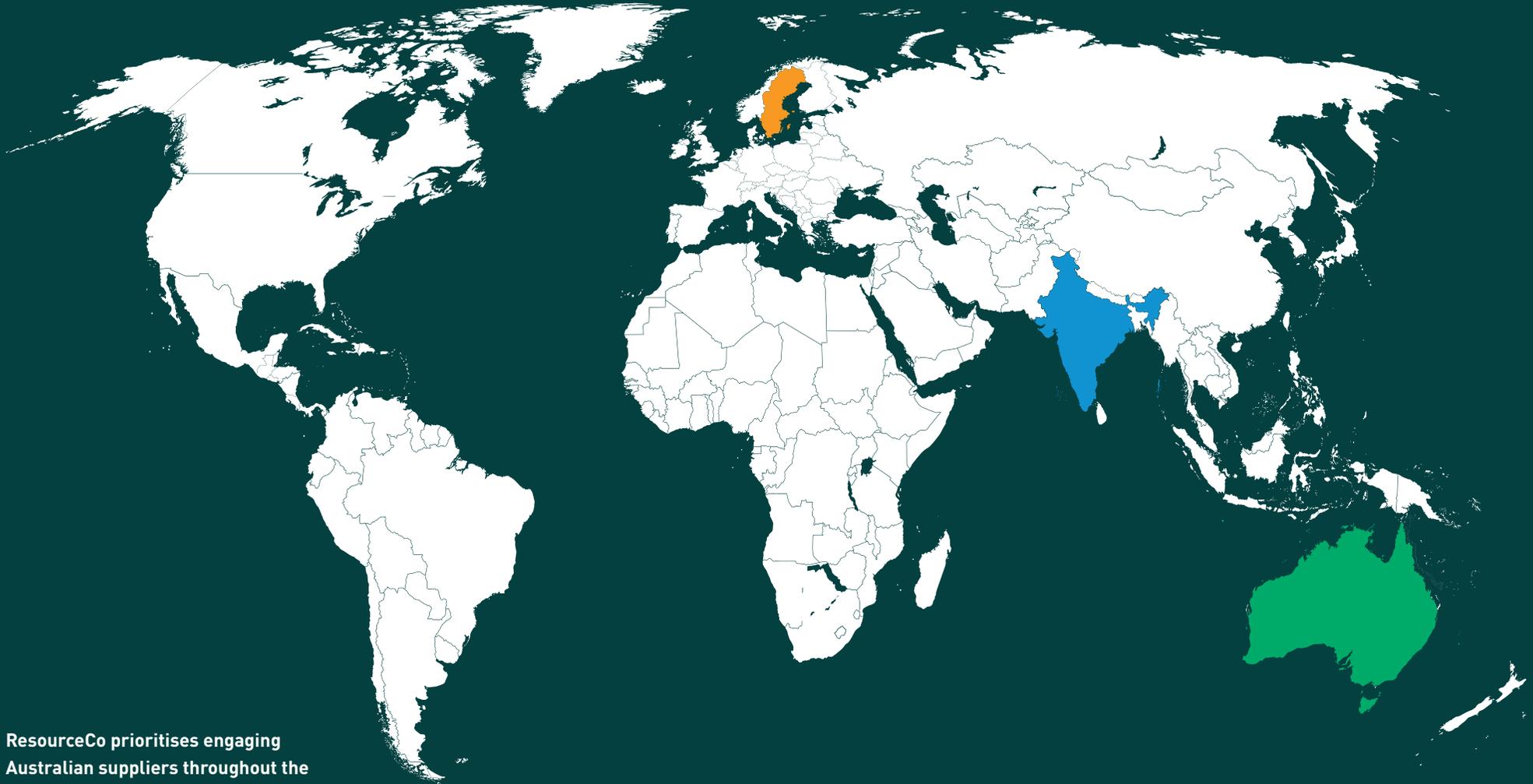
As outlined above, we have opened new sites in the last reporting period, including our new site in Brooklyn, VIC and our glass recycling facility in Wingfield, SA. When we open new sites, we have to acquire new infrastructure to undertake our operations. This infrastructure is niche and is only produced by certain manufacturers, meaning we have limited options in choosing who our suppliers are.

¹Based on our due diligence supplier spend threshold of \$120,000 per annum.

²Based on our due diligence records which go back to 14 September 2021 using our Modern Slavery Portal.



TIER 1 SUPPLIERS



ResourceCo prioritises engaging Australian suppliers throughout the expansion of our operations. 98% of our Tier 1 suppliers are located in Australia, demonstrating our continued support and prioritisation of Australian suppliers.

VOLUME OF SUPPLIERS

AUSTRALIA - 333

INDIA - 1

SWEDEN - 1

We summarise our key supply chains under the following categories:



Logistics

Provision of waste for recycling and resource recovery, management and disposal of products. For example: freight and transport services to collect the waste that we repurpose and the transport of our repurposed goods to our customers.



Cleaning and maintenance

For example, office cleaning and plant and equipment servicing.



Construction and supplies

Provision of key plant, equipment and industrial supplies. For example, excavation of waste from construction sites, the construction of new plant and equipment.



Utilities

For example, electricity, water and telecommunication services used across our business operations.



Professional and administrative services

For example: marketing, legal, IT services, uniforms and merchandise.

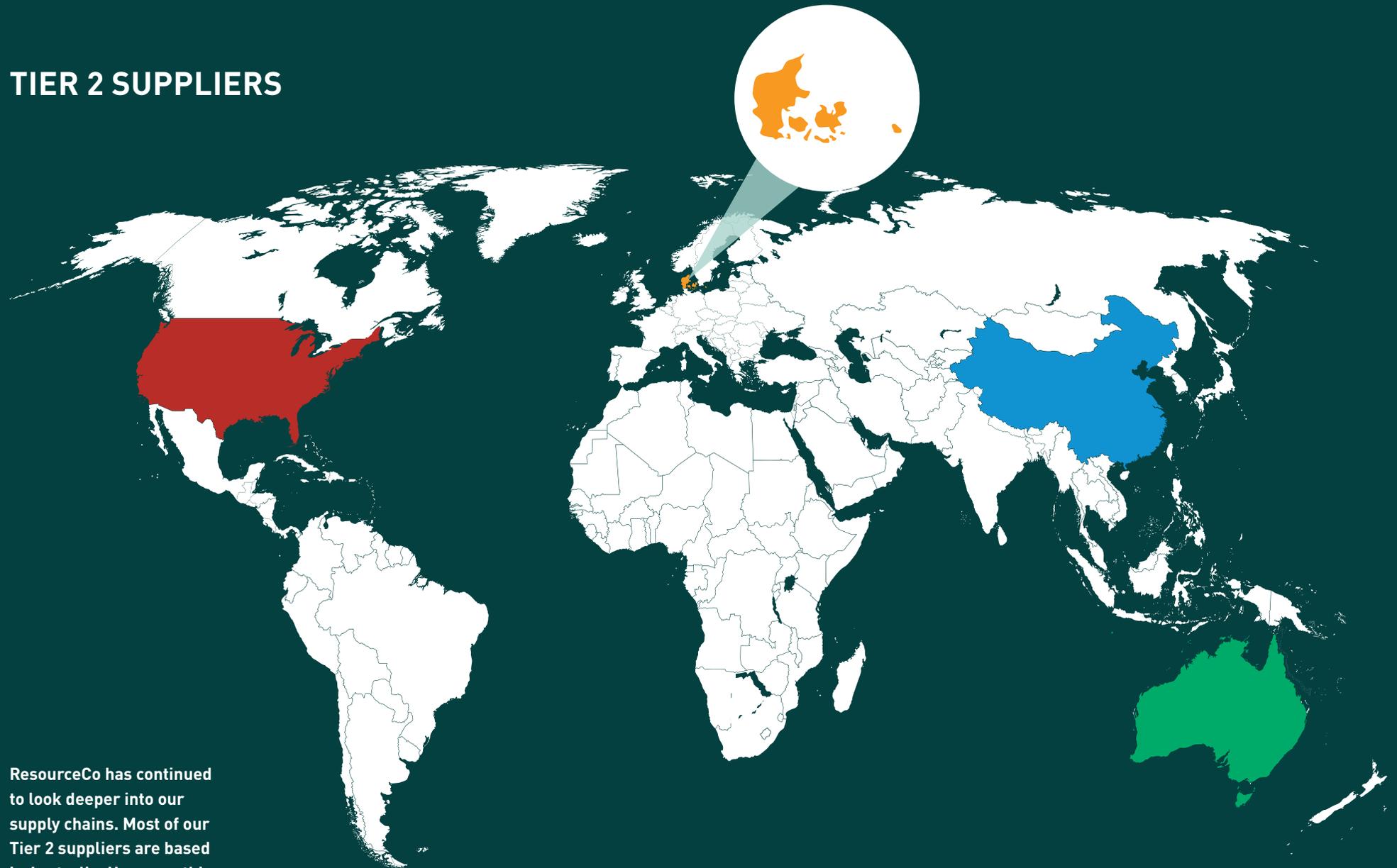


**Case study 1:
Uniforms and Merchandise**

This reporting period we have continued to gain a deeper understanding on our modern slavery risks. Although not directly related to our operations, we are cognisant of risks of modern slavery connected to procurement of commodities such as our uniforms. The risks associated with procuring uniforms and merchandise is particularly important in light of the risks associated with cotton from the Xinjiang Uyghur Autonomous Region in China, which is described in detail in Criteria 3.

Based on this, we have undertaken discussions with our uniform suppliers (based in Australia) to gain a deeper understanding of the supply chain of our uniforms. We identified that our tier 2 uniform suppliers are based in China. We intend to continue to work with our uniform supplier to gain an understanding regarding the modern slavery risks of these tier 2 suppliers and also deeper down our supply chain. This includes, for example, undertaking audits of our uniform suppliers.

TIER 2 SUPPLIERS



ResourceCo has continued to look deeper into our supply chains. Most of our Tier 2 suppliers are based in Australia. However, this map shows that our supply chains become increasingly globalised as we delve deeper into our supply chains.

VOLUME OF SUPPLIERS

AUSTRALIA - 69

CHINA - 2

DENMARK - 1

UNITED STATES - 1

Criteria 3

Modern slavery is a global issue. There are many factors that contribute to the prevalence of modern slavery, including high-risk jurisdictions, vulnerable populations and particular industries and services which are high-risk. Modern slavery can also be linked to broader Environmental, Social and Governance (ESG) risks such as environmental sanctions, fraud and money laundering. Accordingly, we consider our overall modern slavery risk in conjunction with broader ESG risks when assessing the risk present in our operations and supply chains.

THE UN GUIDING PRINCIPLES

ResourceCo undertakes its risk assessment in accordance with the UN Guiding Principles (“UNGP’s”) and the cause, contribute to and directly linked to framework.

Cause

Modern slavery that is caused by the entity itself (via its acts or omissions) For example, where an entity employs children in its own factory.

Contribute to

Activities and / or omissions by an entity that facilitate or enable modern slavery. For example – engaging a supplier and imposing restrictive lead times which leads to forced labour and children being employed to meet lead times.

Directly linked to

Being linked to harm through products, services or business relationships. For example, engaging a supplier and it is later found that this factory employs children.

Alongside the UNGP’s, ResourceCo has developed a risk matrix which considers various risk factors when assessing the modern slavery risk associated with a supplier.



Geographical factors

Higher-risk countries and / or regions within those countries.
For example: the Xinjiang Uyghur Autonomous Region, China is a region in China with a particularly high modern slavery risk, as explained further below.



Product and services factors

Particular products and services that are known as being higher-risk for modern slavery.
For example, products containing polysilicon which is a high-risk raw material for modern slavery.



Sector and industry factors

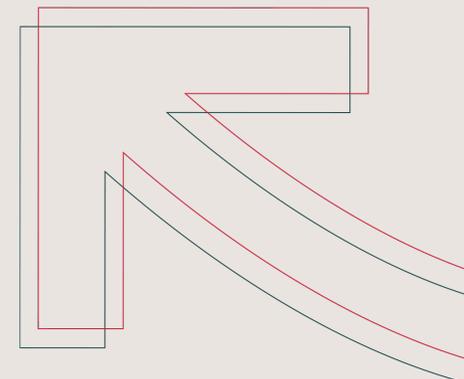
Particular industries and sectors that are known as being higher-risk for modern slavery.
For example – cotton production is an industry with heightened modern slavery risks.



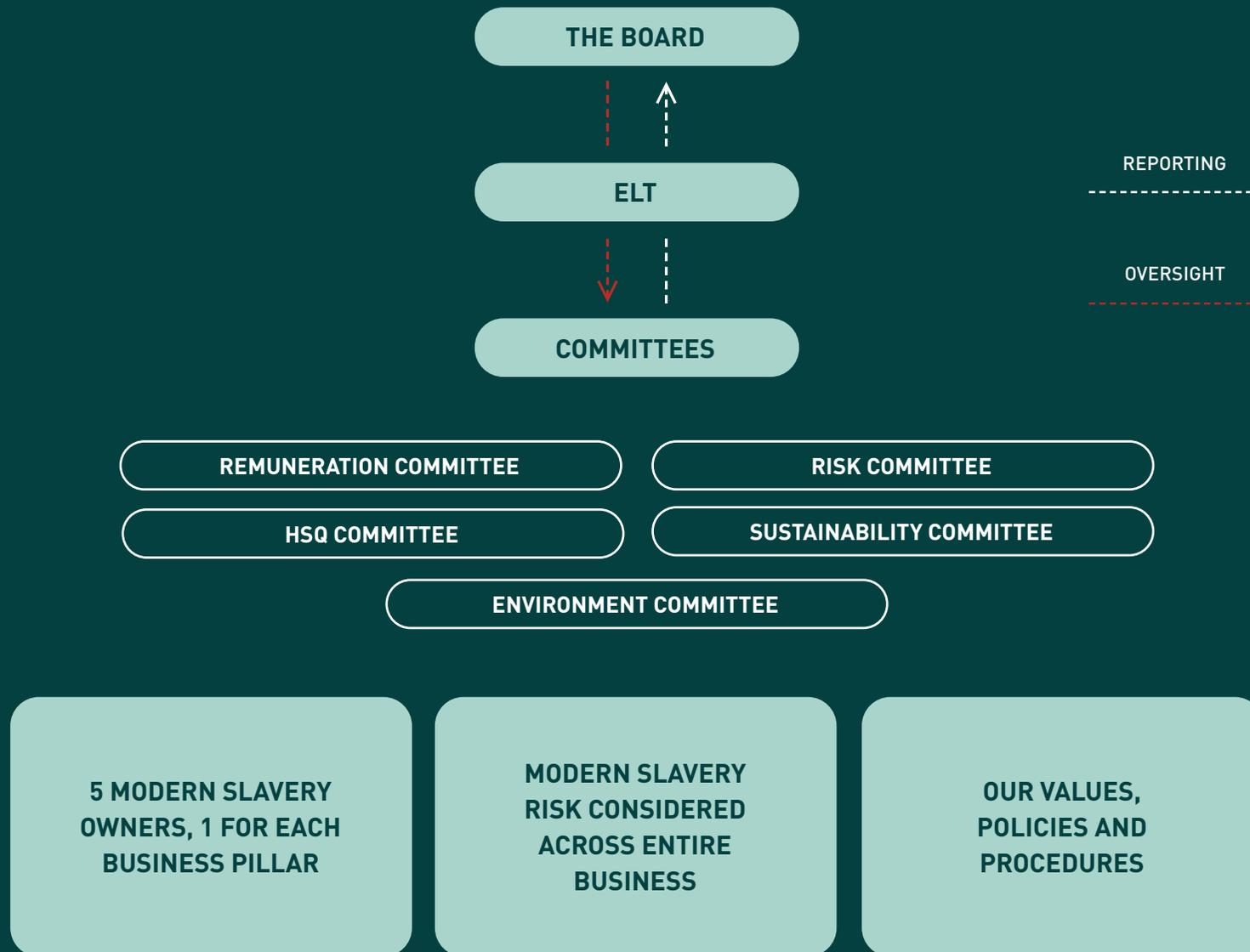
Entity factors

Particular entities that are known for being higher-risk for modern slavery.
For example, entities that have been sanctioned for links to the Russian Government.

To incorporate the above factors into our due diligence processes, ResourceCo has developed a risk matrix which is used to assess the modern slavery risks associated with each supplier. The risk matrix incorporates data from the Walk Free Foundation’s Global Slavery Index to assess the modern slavery risk of suppliers against their prevalence and vulnerability data for countries and specific industries. This is described further in Criteria 4.



GOVERNANCE OF OUR OPERATIONS



OPERATIONS

All of the operations of the ResourceCo Group are centrally managed by ResourceCo. Year on year, ResourceCo ensures that across both Australia and South-East Asia it:

- pays its employees in accordance with local legal requirements;
- operates and maintains its facilities and sites in line with work, health and safety laws; and
- provides employees with:
 - the ability to confidentiality and / or anonymously report concerns or issues through employee grievance mechanisms; and
 - access to resources and employee assistance programs.

Alongside compliance with our operational requirements, we have a strong policy and procedure framework which is the backbone of our operations. This policy and procedure framework includes a Whistleblower Policy and a Code of Conduct. In this reporting period we have undertaken a policy consolidation project. This project has involved us reviewing and consolidating our processes and procedures to great a strong foundation for our future procurement efforts.

As shown in the above diagram, our values, policies and procedures and consideration of modern slavery risk are the foundation of our internal governance structure, with ultimate oversight by the Board. Modern slavery risk is considered at each governance level within ResourceCo, including within each business pillar through our modern slavery risk owners, our committees as well as our Executive Leadership Team and the Board.

Furthermore, we maintain a modern slavery training program for our employees which provides training about identifying modern slavery and how to report any actual or suspected instances of modern slavery. This is described in further detail in Criteria 4 below.

We acknowledge that modern slavery risk differs between our Australian and South-East Asia locations. For example, Australia is listed by the Walk Free Foundations Global Slavery Index as having a low prevalence and vulnerability

rating for modern slavery, whereas Malaysia has a higher prevalence and vulnerability rating.

COUNTRY	PREVALENCE RATING	VULNERABILITY RATING
Australia	1.6 per 1000 people	7 out of 100
Malaysia	6.3 per 1000 people	37 out of 100

For example, in Malaysia it has been widely noted that there have been instances of migrant workers exploitation. In response to this heightened risk, in the last reporting period we undertook a site audit at our Malaysia site which confirmed that there were no instances of modern slavery at that site. We are conscious of the inherent risks associated with operations in Malaysia. In light of this continuing risk, we continue to monitor our Malaysian site to ensure that the risk of modern slavery remains low and are planning to undertake a further audit of our Malaysia operations in the next reporting period and to continue this audit process every two years.

Due to our robust internal governance and policy and procedure framework and our progressive approach to due diligence and assessment of risk, the risk of modern slavery in our operations across both Australian and South- East Asia is low. In this reporting period we have undertaken a policy consolidation project. This project has involved us reviewing and consolidating our processes and procedures to create a strong foundation for our future procurement efforts. We will continue to monitor risk.

Supply Chains

Like all reporting entities, ResourceCo is not immune to the risks of modern slavery, particularly within our supply chains.

Our wide range of service offering makes our supply chains diverse and extensive. We engage with a variety of suppliers, including governments, communities and multi-national companies.

ResourceCo acknowledges that supply chain risks are more prevalent and present deeper in our supply chains (for example, at the Tier 2, Tier 3 and beyond levels). This is the

case for all entities due to how globalised supply chains are in our increasingly interconnected world.

We continue to take steps to monitor and identify these risks. Our priority thus far has largely been focused on our Tier 1 suppliers and ensuring that the suppliers that we directly engage with are assessed and monitored for modern slavery risks. However, as our modern slavery compliance framework has matured, we have been able to start to extend this to our Tier 2 suppliers and beyond.

Merchandise, uniform and broader apparel suppliers carry heightened modern slavery risks based on the location of their manufacturing factories which are often based in higher risk locations such as China. Furthermore, merchandise, uniforms and apparel often utilise linen and cotton which are raw materials that also carry heightened modern slavery risks. These risks, combined with the complexity of these supply chains, makes it difficult to assess these supply chains for risks.

In the last two reporting periods, it has become increasingly evident that there are heightened modern slavery risks associated with the Xinjiang Uyghur Autonomous Region in China ("Xinjiang").

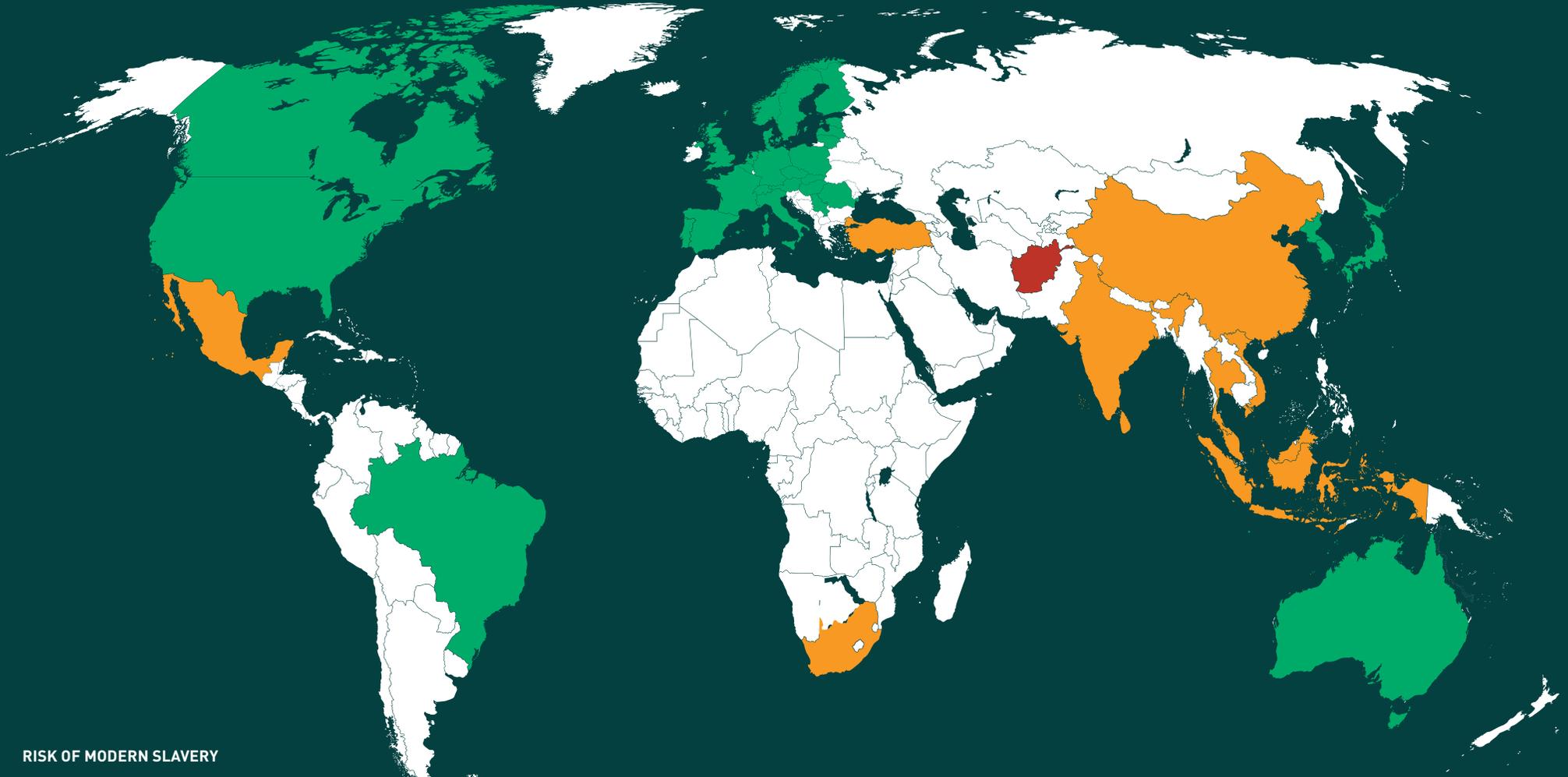
It has been widely publicised that the Chinese government has been expanding the use of forced labour camps in Xinjiang which largely contains people from minority groups such as the Uyghur people. The risks associated with Xinjiang are particularly prevalent in relation to commodities such as tomatoes, cotton and polysilicon. In response to the heightened risk, the US has implemented the Uyghur Forced Labour Protection Act which imposes a presumption that any goods that are from or linked to Xinjiang are made with forced labour. Goods that are imported into the US that meet this presumption are held at the border until the importer disproves this presumption.

ResourceCo takes the risks associated with Xinjiang seriously and continues to monitor its supply chains for any risks of being linked to Xinjiang.

A further analysis of our supply chain risks is outlined in the table below.

COMMODITY	% OF SUPPLIER BASE (FY23)	RISK FOR RESOURCECO	DESCRIPTION OF RISK
Freight	33.4%	Directly linked	Global freight and shipping carry a heightened modern slavery risk. This is due to the fragmented system of regulatory oversight and the isolated working conditions, which results in workers being more vulnerable to exploitation.
Building and Labour	13.4%	Directly linked	Migrant labour is frequently used in the building and labour industry. In addition to this, it is difficult to trace the location of raw materials and workers are often subject to dangerous working conditions.
Waste	5.1%	Directly linked	The waste industry has links to organised crime and human trafficking. Furthermore, many migrant workers or unskilled workers are often employed in the waste industry who are more prone to exploitation.
Recruitment and Labour Hire	1.2%	Directly linked	There is limited regulation of labour practices in some countries. Therefore, as there is a lack of visibility, the modern slavery risk associated with this industry is heightened. Some particular risks that are associated with recruitment and labour hire are deceptive recruiting, underpayment of workers and debt bondage.
Cleaning	<0.1%	Directly linked	The cleaning industry attracts unskilled workers and migrant workers who are more vulnerable to exploitation. Specific practices such as debt bondage and deceptive recruitment are common in the cleaning industry. Furthermore, the supply chains in the cleaning industry are complex which makes it difficult to assess these supply chains for risks.
Merchandise and Uniforms	<0.1%	Directly linked	Merchandise, uniform and broader apparel suppliers carry heightened modern slavery risks based on the location of their manufacturing factories which are often based in higher risk locations such as China. Furthermore, merchandise, uniforms and apparel often utilise linen and cotton which are raw materials that also carry heightened modern supply risks. These risks, combined with the complexity of these supply chains, makes it difficult to assess these supply chains for risks.

SUPPLY CHAINS BY RISK - TIER 1



RISK OF MODERN SLAVERY

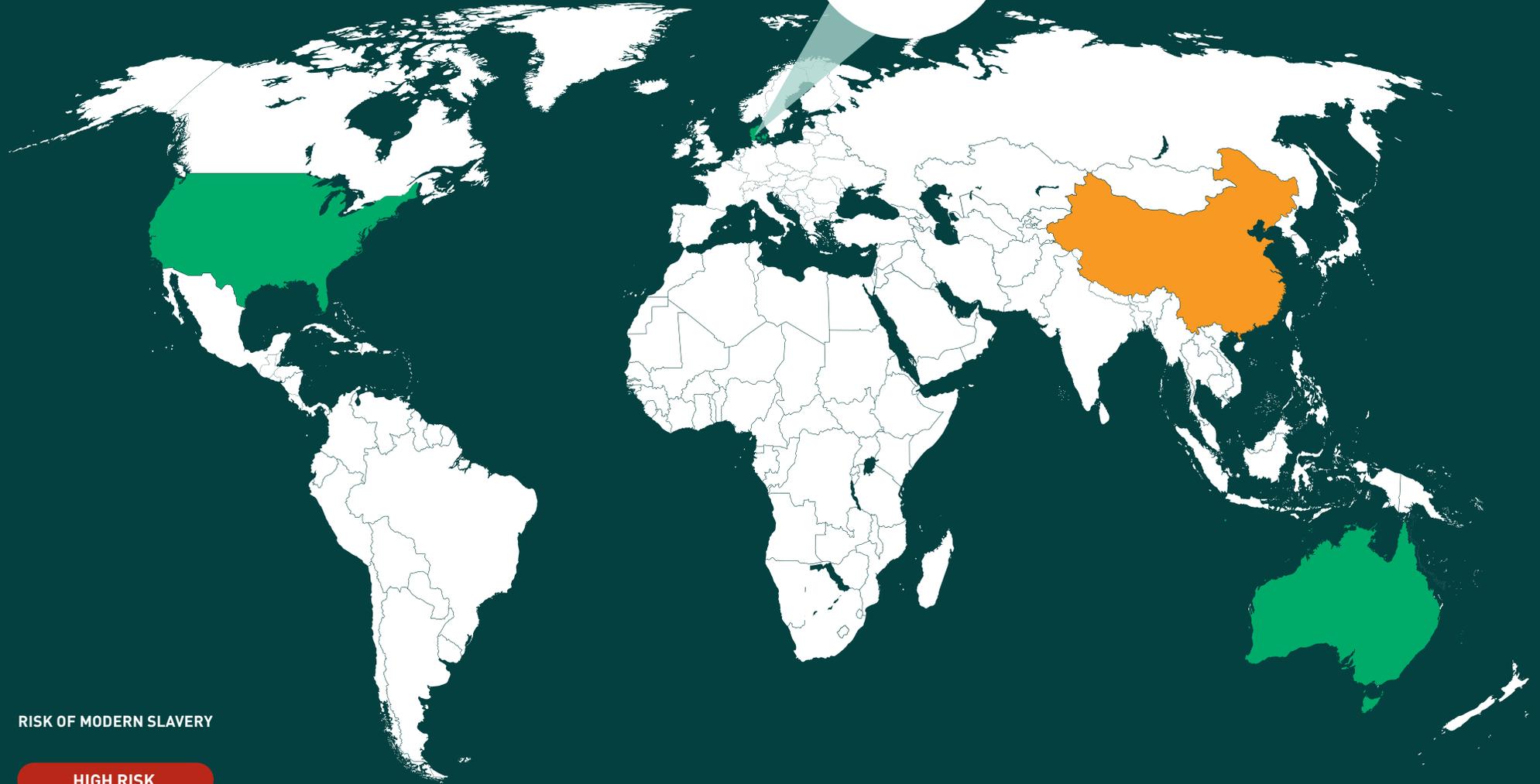
HIGH RISK

MODERATE RISK

LOW RISK

The Walk Free Foundation's Global Slavery Index 2023 assists us in prioritising suppliers based on their risk. The below map shows the geographic risk associated with our Tier 1 suppliers. ResourceCo acknowledges that geographic risk is not the sole risk factor that should be used when assessing supplier risk and that a multi-factorial approach should be taken which considers geographic risks, industry / sector risks, product / service risks and entity risks in the risk analysis.

SUPPLY CHAINS BY RISK - TIER 2



RISK OF MODERN SLAVERY

HIGH RISK

MODERATE RISK

LOW RISK

The risk of modern slavery increase as we delve deeper into our supply chains due to the lack of control and visibility that we have over these supplier relationships. ResourceCo are prioritising due diligence deeper into our supply chains to gain visibility over our Tier 2 and beyond suppliers.

Criteria 4

FOCUS OF THIS REPORTING PERIOD

There have been two broad focuses this reporting period:

- enhancing our existing policy framework and implement steps ahead of supply chain tracing projects and a review of our modern slavery compliance framework in FY24; and
- linking our modern slavery compliance framework with our sustainability and circular economy initiatives.

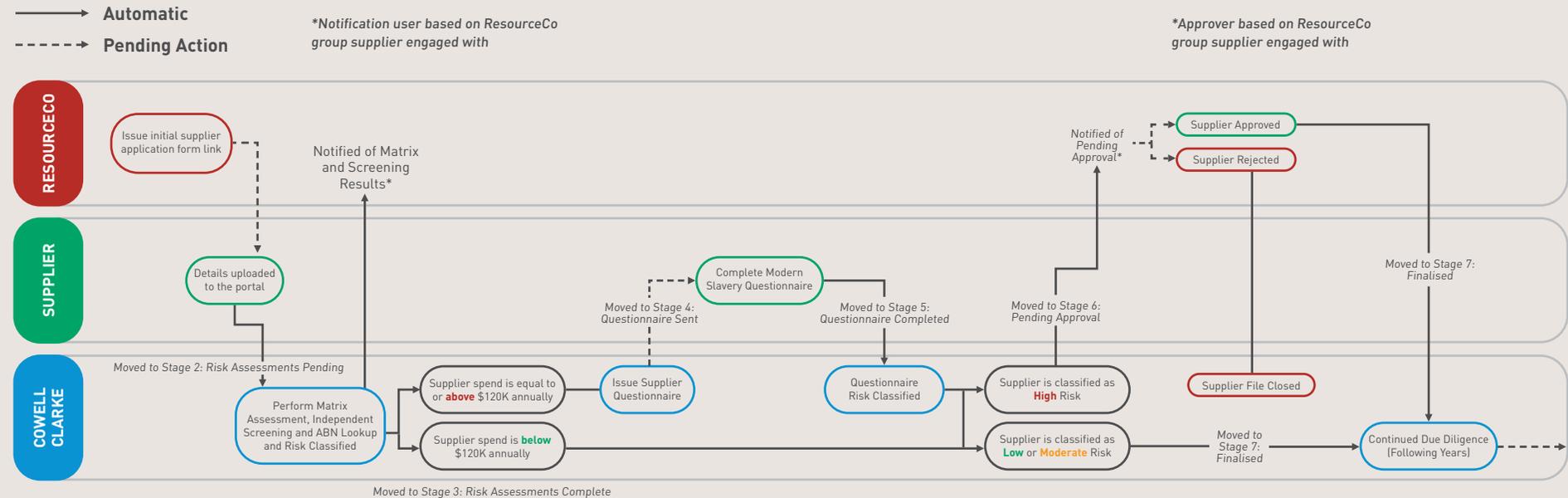
ACTIONS AND OUTCOMES OF DUE DILIGENCE

In this reporting period, we have continued to engage our third-party advisors who assist us in developing and progressing our modern slavery compliance framework. These partnerships ensures our compliance with the “continuous improvement approach” which underpins the requirements of the Act”.

Through our third-party advisors, we use the Supplier Platform (“Platform”) to undertake and maintain our procurement and due diligence framework. This year, we continued to use and expand on our new supplier engagement process.

As outlined in Criteria 3, ResourceCo developed a risk matrix which is used as an initial risk screening tool to assess suppliers for their modern slavery risks based on geographical, industry / sector, product / service and entity factors. This risk matrix forms part of our broader procurement and due diligence workflow (“Workflow”).

In response to the issues identified in Case Study 2 (outlined on the next page), in addition to the immediate risk matrix assessment and independent screening due diligence (Stage 2 of the Workflow), the Platform now captures and summarises “risk origin”. The risk origin data point allows ResourceCo to ascertain if the risk rating is due to a specific adverse finding screening hit or alternatively, based on an industry estimation.



ResourceCo is able to, irrespective of the questionnaire completing status, move the supplier to finalised stage to indicate they have started trading with the supplier.



The Workflow is automated through our modern slavery platform (“Platform”) which measures and tracks modern slavery risks associated with our suppliers. All of our suppliers are on the Platform and risk is measured and tracked on an individual supplier level across different industries and locations.

The Platform assists us in prioritising high-risk suppliers for due diligence and undertaking ongoing due diligence on suppliers. This approach means that the risk rating associated with our suppliers is continually refreshed and updated so that we are aware of new or changing modern slavery risks as and when they arise. For example, the Platform prompts us of when annual due diligence is required on our suppliers so that our suppliers can be re-screened. ResourceCo acknowledges that the risk profile of suppliers can fluctuate and therefore due diligence is undertaken on an annual basis to keep track of any changes to a supplier’s risk rating.



Case study 2: Workflow

During this reporting period, ResourceCo engaged a security supplier. The risk matrix assessment of the supplier came back as “high risk” based on the industry risks associated with the security industry. There were also specific results that were identified in the independent screening of concern, in particular an instance of underpayment.

As the Platform averages the risk scores of both the risk matrix assessment and the independent screening and labels the overall risk score as high, moderate or low risk, the overall risk assessment came back as “high-risk” without detailing the specifics of the screening results. As it was assumed that the high-risk rating was based on the industry of the supplier, the supplier was engaged.

Once ResourceCo was aware of the severity of the screening results, ResourceCo worked with the supplier to ascertain information about processes put in place to prevent underpayment occurring again. Ultimately, it was decided to cease the supplier relationship.

To ensure that a supplier is not engaged again without properly considering the independent screening results, the Platform now captures and summaries the “risk origin” of the supplier. This allows ResourceCo to ascertain if the overall risk rating was due to a specific adverse finding in the independent screenings, or if the risk assessment is based on industry estimations and assumptions. This will assist ResourceCo in determining the actual risk of a supplier during Stage 2 of the Workflow and avoid a situation similar to the above occurring again.

The Platform automates our due diligence processes such as the issuing of questionnaires, risk scoring responses to questionnaires, issuing training to our suppliers and tracking the remediation of any issues identified to streamline our modern slavery compliance framework. From a compliance perspective, this automation helps to streamline our due diligence processes which would otherwise be an onerous manual task to keep track of and undertake.

More broadly, our Workflow assists in mitigating the risk of modern slavery within our supply chains through the early identification of modern slavery risk in suppliers during the onboarding stage of bringing on new suppliers. This means that risk is identified prior to the supplier being formally engaged by ResourceCo, mitigating the risk of modern slavery occurring in our supply chains.

In this reporting period we issued 37 questionnaires (including some refresher questionnaires to existing suppliers) which occurs through automated processes on the Platform based on the risk rating of the relevant supplier. The due diligence undertaken in this reporting period is further described below.

In addition to the Platform, we also use a contract management system provided to us by our third-party advisors which assists us in keeping track of our supplier contracts to ensure that we are aware of when contracts are up for renewal and that we are aware of key clauses within. This will assist us in monitoring our contracts and ensure that, where appropriate, modern slavery considerations are taken into account as part of our contractual arrangements.

GOVERNANCE, POLICIES AND PROCEDURES

The Board’s oversight over our modern slavery compliance framework, our broader governance structures and our policy and procedure framework are the foundations of our due diligence and modern slavery compliance. This oversight is demonstrated above in Criteria 2.

ResourceCo has a Director of Corporate Affairs and Sustainability (who is part of our ELT) who has oversight of our modern slavery compliance framework. The Director of Corporate Affairs and Sustainability reports back up to our Board who has general oversight of our modern slavery compliance framework. The Board continues to value the progression of ResourceCo’s modern slavery compliance framework year on year to help ensure that ResourceCo is appropriately addressing our modern slavery risks and fulfilling its obligations under the Act.

ResourceCo has a suite of policies and procedures that reinforce our modern slavery compliance framework within the ResourceCo Group. Our policy and procedure framework clearly sets out our expectations for suppliers, employees and our organisation as a whole and providing avenues for all relevant parties to report any concerns. Alongside our policies, procedures and values, assessing modern slavery risk underpins our operations throughout each of our business pillars. Each business pillar has a designated modern slavery risk owner to address the specific risks associated with their business operations.

Our policy and procedure suite comprises of the following:

POLICY / PROCEDURE	PURPOSE
<p>Modern Slavery Policy</p>	<p>Sets out ResourceCo’s modern slavery compliance framework and our commitment to compliance with the Act.</p>
<p>Supplier Code of Conduct</p>	<p>During this reporting period, we began a review of our Supplier Code of Conduct with the aim to update it to better reflect our modern slavery compliance framework. This updated Supplier Code of Conduct will be implemented in FY24.</p> <p>Our Supplier Code of Conduct outlines our expectations for our suppliers and how they conduct their operations and their obligations to report any concerns (including modern slavery concerns) to ResourceCo throughout the duration of the supplier arrangement.</p>
<p>Whistleblower Policy</p>	<p>Provides avenues for eligible disclosers including suppliers and employees to report eligible disclosures (including, for example, concerns of modern slavery). Last year, we had two reports made through our whistleblower grievance mechanism. This year, we have had zero reports through our whistleblower grievance mechanism. Because of this, we will review the effectiveness of our whistleblower grievance mechanism to ensure that eligible disclosers are aware of this mechanism and understand how to use this mechanism for reporting concerns and other eligible disclosures.</p>
<p>Anti-Bribery and Corruption Policy</p>	<p>This year, we introduced an ABAC Policy to reflect our zero-tolerance approach to any instances of bribery and corruption within ResourceCo. This reflects ResourceCo’s broader ESG approach to its modern slavery compliance framework and its acknowledgement that broader ESG risks heighten the risk of modern slavery within its suppliers.</p>
<p>Employee Code of Conduct</p>	<p>This year, we also approved an Employee Code of Conduct which will be rolled out in FY24.</p> <p>This outlines our expectations of employees within our organisation broadly, including the expectation to report any concerns surrounding modern slavery.</p>

MODERN SLAVERY AND PLATFORM TRAINING

In this reporting period, we continued to engage our third-party advisers to provide us with modern slavery training for our key employees involved in procurement and supplier engagement.

The heads of each of our business units selected key employees within their business units to undertake this training to broaden the scope of employees that have undertaken modern slavery training within the ResourceCo Group.

The training covered the following key topics:

- Explanation of what modern slavery is and examples of what constitutes modern slavery and “serious exploitation”, such as the worst forms of child labour and debt bondage.
- Explanation of ResourceCo’s reporting obligations under the Act and how the Act operates to administer these reporting requirements.
- The reporting requirements under the Act and what they require.
- Why modern slavery matters and the global context of modern slavery.
- Outline of the key proposed amendments to the Act.
- Contributors to modern slavery such as inadequate lead times and the source location of raw materials.
- ResourceCo’s due diligence framework.
- Explanation of the Platform and key action items for ResourceCo to consider undertaking in future reporting periods which are further described in Criteria 7 below.

SUPPLY CHAIN TRACING AND DUE DILIGENCE

Ongoing due diligence

In FY21, we implemented the Platform. In this reporting period, we utilised the use of the Platform to undertake due diligence in accordance with our procurement and due diligence framework (as outlined in Criteria 3 above). Accordingly, in this reporting period, we undertook the

following due diligence on our suppliers in accordance with our risk matrix:

- Screened 208 of suppliers.
- Risk assessment of 208 of suppliers.
- Issued 37 suppliers with modern slavery questionnaires.
- Issued training to 59 of suppliers.

Assessment against our risk matrix is undertaken during the supplier onboarding (prior to the supplier being engaged) and on an annual basis as part of our ongoing due diligence approach to ensure that our supplier risk assessment is continuously updated. This helps to mitigate our modern slavery risk by:

- identifying key modern slavery risks ahead of being linked to the supplier through the supply contract; and
- continually reviewing the suppliers risk assessment to ensure that ResourceCo is not linked to any modern slavery risk arising out of significant changes within the relevant supplier over time.

SUPPLY CHAIN TRACING

In addition to our due diligence processes, it is important to start to further enhance our due diligence deeper into our supply chains through designated supply chain tracing projects. Undertaking deeper supply chain risk assessments allows us to obtain a clearer picture of our modern slavery risk and have visibility over our suppliers deeper within our supplier chain.

In this reporting period, we identified key suppliers which we will undertake supply chain tracing projects in FY24. We will prioritise supply chain tracing efforts on our international infrastructure suppliers and expand this to other high risk supply chains in future. Through the supply chain tracing projects, we will issue additional questionnaires to these suppliers requesting the details of their suppliers (ResourceCo’s Tier 2 suppliers) to allow us to trace deeper into our supply chains and undertake due diligence on our Tier 2 suppliers.

These supply chain tracing projects are part of our ongoing due diligence approach as well as our risk mitigation approach.

By actively undertaking these supply chain tracing exercises, ResourceCo is undertaking mitigation of risk strategies to ensure that it is aware of key modern slavery risks deeper within its supply chains.

MODERN SLAVERY QUESTIONNAIRES AND TRAINING

As outlined above, ResourceCo issued 37 suppliers with modern slavery questionnaires and 59 suppliers with modern slavery training in this reporting period.

In addition to this, we have undertaken a gap analysis of the suppliers who have been issued with questionnaires and training but have not completed either task. In the next reporting period, we will issue all suppliers who have not completed their modern slavery questionnaires with modern slavery training and follow up suppliers who haven’t completed their modern slavery training.

This added layer of due diligence is important from a risk mitigation perspective. Where there are heightened risks associated with suppliers, undertaking that extra level of due diligence is important to be able to ascertain the actual modern slavery risk of that supplier rather than the perceived risk associated with risk factors such as their location and industry.

MEETINGS WITH STAKEHOLDERS

In this reporting period, we have prioritised involving our key internal stakeholders in our modern slavery compliance. This has assisted us in embedding our modern slavery compliance into our business strategy. Throughout this process, we have been able to hear external perspectives on our modern slavery compliance framework and modern slavery compliance in general which we have been able to take onboard in consideration for future strategies and communication of our modern slavery compliance efforts.

LINKING SUSTAINABILITY TO MODERN SLAVERY

In this reporting period, a key focus for ResourceCo was to link our sustainability initiatives to our modern slavery initiatives. In FY23, we ran nine (9) sustainability workshops for our employees which created awareness among our employees on modern slavery and how this is linked in with our focus on ethical and sustainable procurement.

In addition to this, we appointed a Sustainability Committee which includes members of the ELT, which will report up to the Board on progress on our sustainability initiatives and are also the modern slavery risk owners in each business pillar within our organisation.



Criteria 5

During this reporting period, we have made significant progress in continuing to mature our existing systems and processes by reviewing and amending our policy and procedure framework. We also implemented the steps necessary to undertake a deep dive into our high-risk suppliers in FY24.

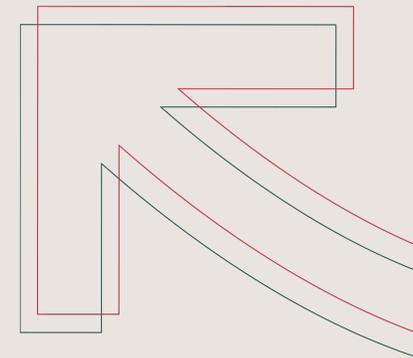
In Criteria 7 of our FY22 Modern Slavery Statement, we outlined some key action items for FY23. Our progress against these action items is as follows:

ACTION ITEM	PROGRESS
Continuing to create awareness and improve on training uptake for our suppliers, to ensure proper identification of risks across our supply chain.	Completed and ongoing.
Introducing an Employee Code of Conduct and an Anti-Bribery and Corruption Policy for enhanced accountability.	Employee Code of Conduct completed and Anti-Bribery and Corruption Policy underway.
Refreshing our procurement policy and procedures to better capture concepts relating to ethical sourcing.	In this reporting period, we have focused on our "policy centralisation project" to create strong foundational change in our procurement efforts. Refreshing our procurement policy will form part of the next stage of this project.
Supplementing our governance structure through the introduction of additional committees such as our Sustainability Committee and Remunerations & Benefits Committee.	Completed and ongoing.

We have focused on reviewing and progressing key functions of our modern slavery compliance framework. This reflects the continuous improvement approach that forms the basis of our framework. To enable this continuous improvement approach, some of the review and monitoring mechanisms that we have in place include:

- continuing to engage third-party specialist advice to review and progress our modern slavery compliance framework, which is particularly important in light of the proposed amendments to the Act (as further outlined in Criteria 7 below);
- continued reporting to the risk committee and directly to the Board of the progress of our modern slavery compliance framework; and
- undertaking internal reviews of our compliance and due diligence processes.

In the next reporting period, the overarching focus will be on assessing the effectiveness of our current processes to build on our continuous improvement approach as further outlined further in Criteria 7 below. An additional focus will be on reviewing our existing due diligence thresholds and our approach to embedding modern slavery compliance deeper into our business model.



Criteria 6

This Modern Slavery Statement for FY23 is issued by ResourceCo Holdings Pty Ltd, on behalf of the ResourceCo Group.

There is common executive leadership and governance across the entire ResourceCo Group. Our Board governs the entire ResourceCo Group. The ELT of the ResourceCo Group are part of the Risk Committee which is tasked with monitoring ResourceCo's modern slavery risk for its operations and supply chains. Accordingly, ResourceCo's approach to due diligence is driven by all operating entities within the ResourceCo Group. Furthermore, the Director for Corporate Affairs and Sustainability, who is a member of the Risk Committee, has oversight over all operating entities to ensure that the modern slavery response from the ResourceCo Group encompasses all operating entities.

In addition to this, ResourceCo's policy and procedure framework applies across the entire ResourceCo Group. This includes the Modern Slavery Policy, Whistleblower Policy, Human Rights Policy and Anti-Bribery and Corruption Policy (currently being developed).

To enable the preparation of this Modern Slavery Statement, there was extensive collaboration and consultation across the ResourceCo Group from the shared finance, management, executives, legal and accounts departments.

Accordingly, during FY23 consultation across the ResourceCo Group was collaborative and extensive across all of our operating entities.



Criteria 7

The focus of the next reporting period is on assessing the effectiveness of our modern slavery compliance framework. Broadly, this will encompass undertaking a broad review of our framework to ensure that we are enhancing and improving on our modern slavery compliance in each reporting period. This will build on the progression of our framework in this reporting period as well as the planning for our supply chain tracing projects that has already occurred.

Some of our proposed action items for FY24 are to:

- ✓ Rollout of our Employee Code of Conduct and passing of our Supplier Code of Conduct.
- ✓ Undertake supply chain tracing of our international infrastructure suppliers.
- ✓ Review our due diligence thresholds and spend vs risk approach.
- ✓ Undertake site audits for our high-risk suppliers.
- ✓ Internal audit of our Asia operations.
- ✓ Benchmark our modern slavery compliance framework against industry competitors and entities within our revenue threshold.
- ✓ Issue modern slavery training to relevant suppliers.

ResourceCo is aware that the proposed amendments to the Act were released in a review paper on 25 May 2023.

The proposed amendments that are the most relevant to ResourceCo are:

- Imposing a positive obligation to undertake due diligence, maintain a due diligence system and report on due diligence actions undertaken in the modern slavery statement.

- Introducing financial penalties for non-compliance with the Act (for example, failure to lodge a modern slavery statement as a deemed reporting entity).
- Listing of high-risk jurisdictions, industries, products and supply chains.
- Introduction of new reporting criteria that requires entities to report on:
 - Modern slavery incidents and risks identified during the reporting period.
 - Grievance and complaint mechanisms available to employees, suppliers and broader stakeholders.
 - Internal and external consultation during the reporting year on the management of modern slavery risk (for example, legal advisers).

ResourceCo alongside its third-party advisers are watching this closely as the review paper proposals are adopted into a formal bill to amend the Act and passed through Federal Parliament.

ResourceCo has an ongoing commitment to the ten (10) principles of the UN Global Compact and the UN SDG's and embeds these principles and goals within our operations. As an organisation assisting in expanding the circular economy, we provide key paths for entities to implement emissions reductions initiatives as entities are searching for ways reduce their greenhouse gas emissions output.

Our approach to sustainability alongside our modern slavery compliance framework assists us in driving environmental, social and economic outcomes within our own operations and for our customers and communities. This is, and continues to be, a priority for ResourceCo as evidenced by the progress outlined in this Modern Slavery Statement.

Board approval

This is ResourceCo's fourth modern slavery statement and is for the period of 1 July 2023 to 30 June 2023.

This statement was reviewed and approved by the ResourceCo Board on 16 December 2023.



Andrew Poulter
Chair

