

Modern Slavery Statement 2020

Waste Services Holding Co Pty Ltd

ABN 18 614 864 836

(Waste Services Group)



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INTRODUCTION

This statement covers the activities of the Waste Services Holding Co Pty Ltd, ABN 18 614 864 836 ('Waste Services Group' herein), and its controlled entities to understand and implement actions to minimise the risk of modern slavery in its operations and supply chain.

This is the first Modern Slavery Statement for the Waste Services Group, in accordance with the Australian Commonwealth Modern Slavery Act 2018.

The purpose of this statement is to outline the Company's approach to ensuring that the Waste Services Group has robust frameworks and processes in place to minimise the risk of modern slavery in its business operations and supply chains.

The Waste Services Group recognises that 'modern slavery' can occur in many forms, as defined in the Modern Slavery Act. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

The Waste Services Group is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across the Group. The Company does not tolerate any forms of slavery in any of its related business entities or supply chain.

OUR BUSINESS

The Waste Services Group was established in 2016 to provide total waste management solutions and services to all industry groups Australia-wide.

The Waste Services Group key operating entities are identified in the 'Structure, Operations & Supply Chain' section of this Statement.

Through the acquisition of the different key operating entities, the Group has developed a structure and the expertise which enables the provision of waste collection functions spanning across total waste management solutions, encompassing collection and transportation of waste, consultancy, comprehensive waste account management and sustainability.

The Group also provides alternative solutions from traditional waste companies by acting on behalf of its customers in a brokerage capacity by procuring (subcontracting) specialist waste providers to facilitate the most suitable waste management solutions whilst working closely with key stakeholders and suppliers and consolidating customer waste needs under a single umbrella.

STRUCTURE, OPERATIONS & SUPPLY CHAIN

For the purposes of this Statement, the Company's key operating entities and the associated supply chains are as follows:

RELATED COMPANIES	OPERATIONS	SUPPLY CHAIN
 <p>The Wasteflex Unit Trust (T/A Wasteflex Pty Ltd) ACN 116 647 379</p>	<ul style="list-style-type: none"> ✓ Provides national broker and account management services for all waste streams including General Waste, Recycled Waste, Prescribed Industrial Waste, Clinical and Other Specialised Waste, Bio-security Waste, etc ✓ National account management services based out of Melbourne, Sydney and Brisbane; ✓ Call centre operations based out of Melbourne; ✓ Wasteflex does not own or operate waste collection vehicles, plant, equipment or disposal facilities 	<ul style="list-style-type: none"> ✓ Contracted waste collection entities who provide services to Wasteflex customers Australia-wide; ✓ Waste management consumables (eg clinical waste bin liners) sourced within Australia; ✓ Office consumables and promotional merchandise; ✓ Technology (hardware, software and cloud services)
 <p>Premier Waste Management Pty Ltd ACN 124 936 616</p>	<ul style="list-style-type: none"> ✓ Provides physical collection of customer waste streams throughout the Melbourne metropolitan region; ✓ Premier Waste owns and operates waste collection vehicles, plant and equipment; ✓ Workshop facilities for vehicle maintenance; ✓ Call centre operations based out of Melbourne 	<ul style="list-style-type: none"> ✓ Automotive requirements (vehicles, tyres, fuel, spare parts which may be sourced from various overseas locations); ✓ Automotive specialists including fitters and mechanics; ✓ Bin and container manufacturer's based in Australia
 <p>Superior Waste Management Unit Trust (T/A Superior Waste Management Pty Ltd) ACN 133 879 106</p>	<ul style="list-style-type: none"> ✓ Provides physical collection of customer waste streams throughout the Melbourne metropolitan region; ✓ Superior Waste owns and operates waste collection vehicles, plant and equipment; ✓ Workshop facilities for vehicle maintenance; ✓ Call centre operations based out of Melbourne 	<ul style="list-style-type: none"> ✓ Automotive requirements (vehicles, tyres, fuel, spare parts which may be sourced from various overseas locations); ✓ Automotive specialists including fitters and mechanics
<p>MGPG Consulting Pty Ltd ACN 157 703 010</p>	<ul style="list-style-type: none"> ✓ Provides broker and account management services for all waste streams including General Waste, Recycled Waste, Prescribed Industrial Waste, Clinical and Other Specialised Waste, Bio-security Waste, etc throughout New South Wales; ✓ Account management services based out of Sydney; ✓ Call centre operations based out of Melbourne; ✓ WasteSpec does not own or operate waste collection vehicles, plant, equipment or disposal facilities 	<ul style="list-style-type: none"> ✓ Contracted waste collection entities who provide services to WasteSpec customers within New South Wales; ✓ Office consumables and promotional merchandise; ✓ Technology (hardware, software and cloud services)

POLICIES & PROCEDURES

Waste Services Group have formal policies in place that are intended to promote ethical and legally compliant business conduct.

All teams that procure for the Waste Services Group have a number of risk mitigation and procurement processes in place including:

- ✓ Code of Conduct Policy;
- ✓ Whistle Blower Policy;
- ✓ Social Responsibility Policy;
- ✓ Sustainable Procurement Policy; and
- ✓ Contractor and Supplier Management procedures.

All the above policy and procedural controls will be reviewed to ensure that the Group have robust processes in place to minimise the risk of modern slavery in its operations and supply chain.

POTENTIAL RISKS OF MODERN SLAVERY

The Waste Services Group has been able to identify areas with 'NO' or 'LOW' risk in its operational activities that are directly undertaken by employees and covered by the internal processes of the various operational entities (refer Appendix 1 below).

The Group will implement future processes to identify potential risks associated with supply chains including modern slavery due diligence questionnaires and other contractual requirements.

ADDRESSING MODERN SLAVERY RISKS

The Group requires its suppliers and contractors to abide by the requirements of the Modern Slavery Act 2018 in accordance with the Waste Services Group Terms and Conditions.

The Group engages with suppliers and contractors to promote and support anti-slavery practices throughout the individual operating entities' supply chains and other contracted entities.

The Group is committed to introducing anti-slavery obligations in all supplier and other contracted entity contracts.

As part of their contractual obligations, Suppliers and Contractors will agree to provide information (as required) so the Group can gauge the supplier's and contractor's ongoing

commitment to eradicating modern slavery within their own business and those of their own suppliers and contractors.

Waste Services Group Terms and Conditions are required to be agreed upon in the initial contractor and supplier pre-qualification process that is submitted via the Group's online contractor management system Rapid Global.

All suppliers and contractors are required to comply with the Waste Services Group Terms and Conditions of engagement and other policies and standards on human rights, ethical business practices, safety and environment.

The Group Health, Safety, Environment and Quality (HSEQ) departments review all submissions for compliance and liaise with key team members to be able to verify documents submitted. All contractor companies must be compliant prior to being utilised by the Group.

In February 2020, the Waste Services Group held its initial Modern Slavery awareness and risk mitigation session with key stakeholders. The session reviewed the reporting obligations and mapped modern slavery risks to its operation including the following key actions:

- ✓ Developing Modern Slavery Policies relevant to the key operating entities;
- ✓ Modifying contractor and supplier pre-qualification processes;
- ✓ Updating the Waste Services Group Terms and Conditions to include compliance requirements under the Modern Slavery Act 2018; and
- ✓ Development of the Waste Services Group Modern Slavery Due Diligence Questionnaire.

FUTURE COMMITMENT

Policy Review:

Review and update current policy and procedural framework to ensure it meets best practice.

Training:

Deliver modern slavery training to all staff to increase capability and ensure they are able to assist suppliers in building their capabilities.

Engagement:

Engage with suppliers to ensure they understand their requirements and assist them through the process to build capabilities as required.

Audit:

Improving contractor management systems and audit programs to ensure they are efficient and effective.

APPENDIX 1: COMPANY DIRECTORY & SIGNATORY

Registered Office

10-12 Graham Daff Boulevard
BRAESIDE
VICTORIA 3195

Waste Services Holding Co Pty Ltd Sustainability

Matt Tamplin

Chief Executive Officer (CEO)

Christine MacNish

HSEQ & Compliance Manager
(Premier Waste/Superior Waste)

Matt Purcell

HSEQ & Compliance Manager
(Wasteflex/MGPG Consulting)

This Statement was approved by the Board of Waste Services Holding Co Pty Ltd



Matt Tamplin

Chief Executive Officer (CEO)

Waste Services Holding Co Pty Ltd

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VICTORIA 3195