



TOMRA Collection Pty Ltd

# Modern Slavery Statement FY25

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## Covering note from the CEO

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As CEO and on behalf of the Board of Directors, I am pleased to present TOMRA Collection Pty Ltd.'s Modern Slavery Statement covering the financial year 2025 reporting period. This statement has been formally reviewed and approved by the Board, demonstrating our commitment to identifying, assessing, and addressing modern slavery risks across our operations and supply chains, in line with our obligations under the Modern Slavery Act 2018 (Cth). We recognise that modern slavery is a serious violation of human rights and that combating it is essential to ensuring ethical, transparent, and sustainable business practices. In collaboration with TOMRA Global, we are developing our counter-slavery program and will continue and deepen that program year-on-year.

*David Hanrahan*

CEO, TOMRA Collection Pty Ltd

## Introduction

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The Australian ***Modern Slavery Act 2018*** (the Act) defines modern slavery as situations where coercion, threats or deception are used to exploit victims and undermine them of their freedom. It is used to describe eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

In financial year 2025 (FY25) TOMRA Collection Pty Ltd met the mandatory reporting threshold under the Modern Slavery Act, making this our third formal modern slavery statement. Contained below, we follow the seven mandatory reporting criteria to outline our potential risks and the actions taken during the reporting period to understand and mitigate those risks as part of our commitment to improving our practices year-on-year and to maintain our human rights standards.

## Criterion One: The reporting entity

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This Modern Slavery Statement has been prepared in accordance with the requirements of the Act. It is the third statement issued by TOMRA Collection Pty Ltd (TOMRA Collection Australia) - ABN 90 111 224 018 and covers the reporting period from **1 January 2025 to 31 December 2025 (FY25)**.

TOMRA Collection Australia, a proprietary limited company established in Australia in 2004, is headquartered in New South Wales and serves as the reporting entity under the Act. TOMRA Collection Australia provides automated technology for recycling drink containers, operating as a leader in reverse vending machines (RVMs) and container deposit schemes.

TOMRA Collection Australia reverse vending machines, bulk sorting equipment and modern depot facilities are deployed across hundreds of sites across Australia, mainly in retail car parks, shopping centres, and stand-alone recycling centres.

TOMRA Collection Australia is owned by TOMRA Systems ASA, which altogether has approximately 105,000 installations in over one hundred markets worldwide (see more detail in the following section). This statement covers only the operations of TOMRA Collection in Australia.

### TOMRA Collection Pty Ltd



**Employees**

334



**Number of Sites**

766



**Reverse Vending Machines**

2694



**Locations**

NSW, QLD,  
WA, VIC, NT,  
SA, TAS

*Details as of 31 December 2025*

## Criterion Two: Structure, operations, and supply chains

### Structure

TOMRA Collection Pty Ltd is the Australian subsidiary of the ultimate parent company, TOMRA Systems ASA (TOMRA Group) which is a publicly listed company headquartered in Norway founded in 1972. TOMRA Group operates worldwide through three core business divisions: Collection, Recycling, and Food. Within this structure, TOMRA Collection Australia forms part of the Collection division and represents the Australian operations of TOMRA Group's container-collection business.

TOMRA Sorting Pty Ltd (part of TOMRA Group's recycling division), TOMRA Cleanaway Pty Ltd (a joint venture operating under the Return and Earn scheme in New South Wales), TOMRA Cleanaway (Victoria) (a joint venture operating under the VIC Return scheme in Victoria), TOMRA Cleanaway (Tasmania) (a joint venture operating under the TAS Recycle scheme in Tasmania), and BottleCycler Australia Pty Ltd are related entities to TOMRA Collection Australia as they share ownership in Norway but are not included within this statement as they are separate legal entities.

### Operations

Our operations focus on managing automated container recycling through reverse vending

machines and modern depot networks supporting state container deposit schemes in Australia.

- Providing reverse vending machines (RVMs) for automated bottles and can return, offering instant digital or cash-equivalent refunds for eligible beverage containers.
- Managing and servicing collection points including machine uptime, repairs, and customer engagement.
- Operating modern depots where customers return larger volumes of containers, which are aggregated and collected.
- Customer-facing interactions such as attending to customer queries through a Call Centre.
- Managing employee workforce involved in machine servicing, maintenance, and local administration.

## Supply Chains

TOMRA Collection Australia operates a complex supply chain system to support our extensive network of automated container return points.

TOMRA Collection Australia works with a broad network of suppliers that we purchase and source from, with our direct (Tier 1) suppliers predominantly based in Australia and Norway. To strengthen our understanding of our supply chain, we conducted a detailed risk assessment of our FY25 supplier base. Suppliers were mapped to relevant sub-industries using the GICS sub-industry classification, enabling a clearer view of the composition of our supply chain. This process identified the prevalence of suppliers operating across key sectors, including Air Freight and Logistics, Construction and Engineering, Cargo Ground Transportation, and Security and Alarm Services, as well as highlighting exposure to industries recognised as higher risk for modern slavery.

As this was the first detailed risk assessment undertaken, the analysis primarily relied on available data and did not extend to identifying specific high-risk products within these industries. However, prior high-level analyses conducted in FY23 and FY24 indicate that TOMRA Collection Australia's key procured inputs include steel, electronics, merchandise, and signage, largely associated with the construction of the RVMS. These inputs are sourced through a multi-stage production process, with kiosk manufacturing involving container-based pre-assembly, component production across multiple regions, and final assembly supported by labour hire arrangements.

While the FY23 and FY24 assessments were conducted at a high level, the FY25 assessment represented a more comprehensive analysis. Approximately 900 Tier 1 suppliers were assessed, with risk evaluated based on factors such as geographic exposure, industry risk, and other relevant indicators. Further details are provided under Criterion 3.

Our indirect suppliers (i.e. our suppliers' suppliers, or Tier 2 and beyond) are more geographically diverse. In FY24, we gained improved visibility into the origins of Tier 2 suppliers for our highest-spend Tier 1 suppliers, which are primarily located in China. Further analysis is needed to more comprehensively map our value chain, with this work planned for future reporting periods (See Criterion 4 below).

Intra-company expenses have been excluded from the FY25 supply chain risk assessment, as they are considered operational risks rather than supply chain risks.



**Top Source Countries  
by Spend (Tier 1  
suppliers)**

- Australia
- Netherlands
- Israel
- Malaysia
- Singapore

**Top Tier-2 Supplier  
Countries  
(by Tier-1 Spend)**

- China



**Key Sourcing  
Industries based on  
Spend (Tier 1  
suppliers)**

- Consumer Staples Merchandise Retail
- Environmental & Facilities Services
- Human Resources & Employment Services
- Construction & Engineering
- Trading Companies & Distributors



**Key Sourcing  
Products (Tier 1  
suppliers)**

- Steel
- Electronics Hardware
- Merchandise
- Computer and Electrical
- Stands and Signage

TOMRA Collection Australia maintains oversight of its supplier network across all operational areas. However, for reverse vending machine-related activities, supplier management and control are handled through the parent entity, which limits TOMRA Collection Australia's direct influence over these suppliers.

## Criterion Three: Modern slavery risks assessment

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TOMRA Group is a member of the United Nations Global Compact (UNGC) and TOMRA Collection Australia is committed to implementing the principles of UNGC through responsible business conduct. We recognise that modern slavery risks exist in both our operations and supply chains. Looking first at our own operations in Australia, we have had no instances or reports of modern slavery occurring. However, we know no organisation is immune from modern slavery, regardless of the industry or operating location, and therefore must remain vigilant with a focus on self-reflection and continuous improvement of our controls and practices.

In FY25, TOMRA Collection Australia undertook a comprehensive supply chain risk assessment covering 870 Tier-1 suppliers to strengthen its understanding of potential modern

slavery risks across operations and supply chains. The assessment applied a structured, risk-based methodology using two analytical lenses to identify, prioritise and better understand areas of elevated risk.

### **Lens A: Inherent Risk**

Lens A assessed inherent modern slavery risk based on supplier geographic location and sub-industry exposure, evaluated against five key human rights indicators:

- Forced labour
- Working time
- Decent wages
- Migrant workers
- Occupational health and safety

This analysis provided a baseline view of where modern slavery risks are more likely to occur irrespective of TOMRA Collection Australia's direct influence.

### **Lens B: Adjusted Risk**

Lens B built on the inherent risk assessment by incorporating supplier-specific factors to better reflect TOMRA Collection Australia's actual exposure to modern slavery risk.

Adjustments included:

- Supplier spend (to reflect the scale of TOMRA Collection Australia's engagement and potential impact)
- Industry-specific risk within Australia, informed by external data sources
- Presence of modern slavery-related legislation or regulatory frameworks, used as a proxy for stronger supplier controls and governance

This lens has been prioritised to inform our understanding of risks and next steps, as it provides a more representative view of TOMRA Collection Australia's actual exposure across its supply chain. Based on this approach, each supplier was assigned a risk rating to support prioritisation and targeted risk management actions.

The assessment found that 98.6% of Tier 1 suppliers are based in Australia, which is generally considered a lower-risk geography. However, TOMRA Collection Australia recognises that domestic supply chains may involve complex, global upstream value chains, and that even when a product or service originates from Australia, it is still possible to involve forms of modern slavery: recent estimates from the Global Slavery Index suggest there may be upwards of 40,000 people trapped in slavery in Australia today.

Within Australia, suppliers are concentrated in New South Wales (48%) and Victoria (16%), reflecting TOMRA Collection Australia's operational footprint in relatively lower-risk, highly regulated jurisdictions.

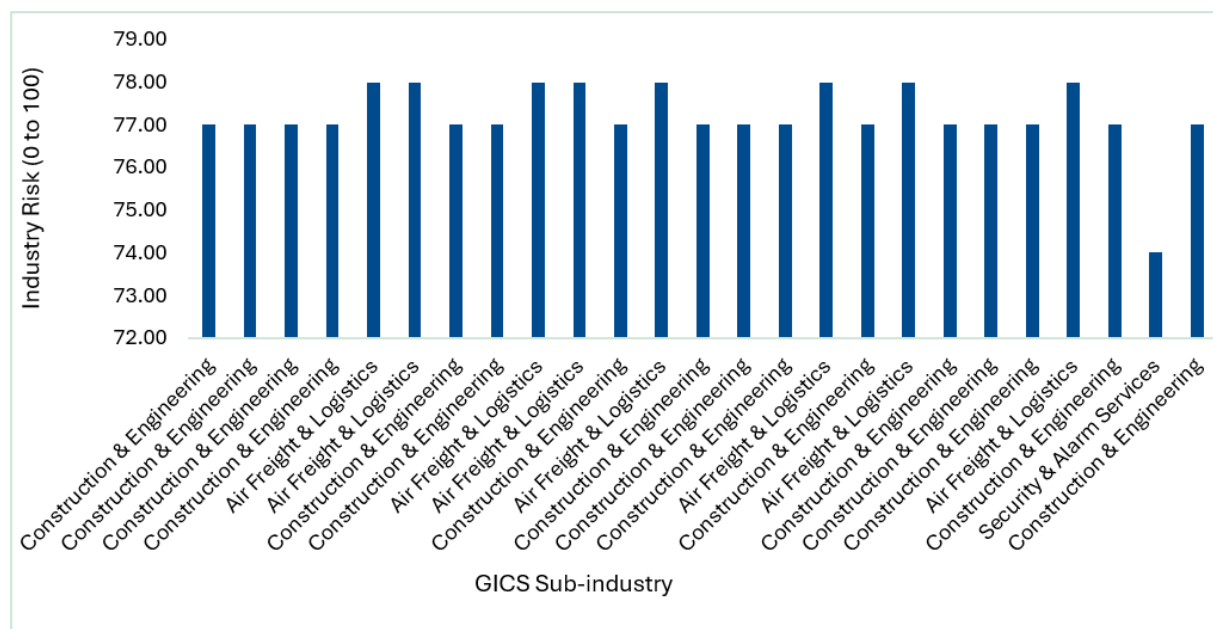
A small number of suppliers are located internationally.

From an industry perspective, the assessment identified several sectors as presenting the highest modern slavery risk, given their known exposure to subcontracting, low-wage labour, and vulnerable worker groups. When supplier location and spend were also considered, these industries were further prioritised as high risk under the risk assessment;

- Human Resource & Employment Services
- Research & Consulting Services

- Construction & Engineering
- Air Freight & Logistics
- Security & Alarm Services

Figure 1 presents the industry risk scores across the top 25 highest risk Australian suppliers within TOMRA Collection Australia's FY25 supply chain.



*Figure 1: Sub-industry distribution of TOMRA Collection Australia's top 25 highest-risk Australian suppliers*

This analysis identified a total of 12 suppliers classified as 'high risk', of which;

- Only 2 international suppliers, both from the APAC region
- The remaining high-risk suppliers are Australian, primarily operating within the construction and logistics sectors.

Table 1 summarises the Australian suppliers identified as high risk under lens B. Supplier identities have been anonymised. The table highlights the key drivers contributing to 'high risk' ratings under lens B.

| Supplier | Location       | Sub-Industry               | Key Driver                                                                                          |
|----------|----------------|----------------------------|-----------------------------------------------------------------------------------------------------|
| A        | Australia -TAS | Construction & Engineering | Supplier spend, industry exposure, and the classification of the industry as high risk in Australia |
| B        | Australia -NSW | Construction & Engineering | Supplier spend, industry exposure, and the classification of the industry as high risk in Australia |

|   |                 |                            |                                                                                                     |
|---|-----------------|----------------------------|-----------------------------------------------------------------------------------------------------|
| C | Australia - VIC | Construction & Engineering | Supplier spend, industry exposure, and the classification of the industry as high risk in Australia |
| D | Australia – NSW | Construction & Engineering | Supplier spend, industry exposure, and the classification of the industry as high risk in Australia |
| E | Australia – NSW | Air Freight & Logistics    | Supplier spend and industry exposure                                                                |
| F | Australia - TAS | Air Freight & Logistics    | Supplier spend and industry exposure                                                                |
| G | Australia – NSW | Construction & Engineering | Supplier spend, industry exposure, and the classification of the industry as high risk in Australia |
| H | Australia - NSW | Construction & Engineering | Supplier spend, industry exposure, and the classification of the industry as high risk in Australia |
| I | Australia – NSW | Air Freight & Logistics    | Supplier spend and industry exposure                                                                |
| J | Australia - VIC | Air Freight & Logistics    | Supplier spend and industry exposure                                                                |

*Table 1: High-Risk Australian Suppliers Identified Under Lens B and Key Risk Drivers (FY25)*

Elevated risk in these cases was driven by a combination of high exposure and higher-risk industry characteristics, particularly in sectors where labour exploitation risks are more prevalent.

## Criterion Four: Actions taken, including due diligence and remediation

TOMRA Collection Australia is continuing to advance our counter-slavery response package based on last-year's work and upon the formal supply chain risk analysis results identified in the prior section.

Based on the supply chain risk assessment, TOMRA Collection Australia identified that suppliers are concentrated within a small number of higher-risk industries, with risk exposure primarily driven by industry characteristics and supplier spend, rather than geographic location. A small number of suppliers were identified as high risk, informing immediate actions, while the majority were assessed as medium risk and will be subject to ongoing monitoring.

This enhanced understanding has informed a series of targeted actions to assess and address modern slavery risks:

- Prioritise 12 suppliers identified as high risk under Lens B for targeted engagement and further human rights due diligence (HRDD).
- Commence development of a value chain risk management approach, including:
  - Mapping upstream value chains for the targeted 12 high-risk suppliers to improve visibility of risks beyond Tier-1.
  - Issuing self-assessment questionnaires (SAQs) to material suppliers (above a defined spend threshold) to collect value chain data and strengthen risk identification and assessment processes.
- Strengthen governance and response mechanisms through the refinement and formalisation of risk escalation procedures, including:
  - Clear escalation pathways based on supplier risk ratings; and
  - Defined actions to manage, mitigate and monitor identified risks across supplier categories.

Our efforts, to date, have focused mostly on policy and procedure improvements to better align our Australia practice with TOMRA Group's human rights efforts.

Firstly, we are working to align our human rights due diligence approach with TOMRA Group's framework, which is based on the OECD Guidelines for Responsible Business Conduct. This framework follows six key steps as outlined in [TOMRA Group's Commitment to Human Rights](#):

1. Embedding responsible business conduct into policies and management systems;
2. Identifying and assessing actual or potential adverse impacts within operations and supply chains;
3. Taking action to prevent or mitigate identified risks;
4. Tracking and recording implementation and outcomes;
5. Communicating how impacts are addressed; and
6. Enabling or cooperating in remediation where appropriate.

As part of efforts to embed responsible business conduct into policies, a Business Principles for Suppliers & Partners Policy was introduced by TOMRA Group in 2019. This policy serves as the Group's supplier code of conduct and sets out expectations around sustainability; human & labour rights; and health, safety, and the environment. It also reinforces compliance with anti-bribery and corruption standards and ethical business practices. Suppliers are required to provide accurate information, cooperate with assessments and due diligence reviews, and participate in ongoing monitoring through TOMRA Group's established tools, communications, and audits. TOMRA Collection Australia applies this Group policy by providing the Business Principles for Suppliers & Partners Policy to suppliers on initial

engagement for review, confirmation and sign-off, and by regularly monitoring our due diligence system for supplier alerts and changes in beneficial ownership.

Further, TOMRA Group's Human & Labour Rights Policy sets clear expectations for ethical conduct and performance across its operations and supply chain. This policy is supported by TOMRA Group's remediation and grievance procedure, which provides avenues for concerns to be raised and addressed. An internal reporting portal is available to all employees and stakeholders to confidentially report any behaviour inconsistent with TOMRA Group's values, code of conduct, or applicable laws. TOMRA Collection Australia applies this Group policy by ensuring mandatory Compliance training is completed on a regular basis by all employees.

TOMRA Collection Australia applies an Integrity Due Diligence Policy to assess the compliance risks of customers, agents, projects, and suppliers above a 50,000 AUD spend threshold. Reviews are conducted through a global compliance platform. Where risks or "red flags" are identified, compliance officers assess the issue and recommend mitigating actions. Final approval of new suppliers' rests with relevant business heads, and these reviews are undertaken quarterly.

As we advance along our counter-slavery journey, TOMRA Collection Australia has developed an action plan to guide our future efforts:

| Planned Action                                                                           | Target Completion |
|------------------------------------------------------------------------------------------|-------------------|
| Conduction Tier-1 Supplier Modern Slavery Risk Assessment                                | Complete (FY25)   |
| Undertake a modern slavery maturity assessment to identify current capabilities and gaps | In Progress       |
| Middle and senior management to complete Modern Slavery Awareness Training               | In Progress       |
| Establish TOMRA Collection Australia, Human Rights Committee or Working Group            | FY27              |
| Establish a formal Human Rights Due Diligence Process                                    | FY27              |
| Develop a formal Remediation Process                                                     | FY28*             |

*\*Due to resourcing constraints, the target completion date has been deferred from FY27 to [FY28] compared to prior plans; however, implementation is still intended.*

## Criterion Five: Assessing the effectiveness of actions taken

TOMRA Collection Australia remains in our early stages of developing a formal and practiced process for assessing the effectiveness of our counter-slavery actions. However, we acknowledge the importance of doing so to ensure continuous improvement.

The FY25 supply chain risk assessment establishes a baseline to measure the effectiveness of actions taken to address modern slavery risks within the supply chain and will support ongoing

monitoring and continuous improvement. Over the coming reporting periods, we intend to develop measurable indicators to evaluate the impact of our counter-slavery activities, such as supplier risk assessment outcomes, completion rates for employee training, or the integration of modern slavery considerations into procurement processes. These measures will help us to monitor progress, identify gaps, and strengthen our overall response to modern slavery risks across our operations and supply chains.

Currently, our policies are continuously reviewed and updated to ensure they remain fit for purpose and aligned with TOMRA Group's values and objectives. Group Compliance will periodically assess compliance performance as a key performance indicator (KPI) and report outcomes by division.

## Criterion Six: Consultation with subsidiary entities

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As the reporting entity does not own or control any other entities, a formal consultation process across multiple entities was not required for this reporting period. Although each entity operates independently, all TOMRA Group entities are governed by, and adhere to, Group policies, ensuring consistent application of the Group's governance principles across the organisation.

Internal consultation took place among relevant teams, including procurement, to support the preparation of this statement and ensure a shared understanding of our modern slavery obligations.

Looking ahead, we intend to extend engagement to key suppliers and industry peers to strengthen our collective response to modern slavery risks. These consultations will help inform us about future improvements to our risk management approach and the effectiveness of our actions.

## Criterion Seven: Other relevant information

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Nothing further to add.

## Approval

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This report was reviewed and endorsed on 26<sup>th</sup> June 2026 by TOMRA Collection Pty Ltd's Board of Directors—the group's highest governing body—and is signed on the board's behalf by the Chair of the Board Tor Eirik Knutsen.

