



MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2020-2021

WA RETURN RECYCLE RENEW LIMITED

We acknowledge the Traditional Custodians of the land upon which we live and work, and our respect to their Elders past, present and emerging.

We recognise the practice of intergenerational care for Country and its relevance to our work. We seek to listen, learn and build strong partnerships.

We aim to provide genuine opportunities for Aboriginal and Torres Strait Islander peoples in Western Australia through the container deposit scheme, Containers for Change.



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INTRODUCTION

Western Australia Return Recycle Renew Limited (WARRRL) is a not-for-profit organisation appointed by the State Government of Western Australia to coordinate WA's container deposit scheme (CDS), Containers for Change.



OUR ORGANISATION

We aim to:

- Increase the recovery and recycling of beverage containers.
- Reduce the amount of beverage containers in litter and landfill.
- Help create new jobs in our communities.
- Work with existing collection and recycling programs in WA.
- Make sure manufacturers fulfill their product stewardship responsibilities.
- Encourage social enterprise to improve communities and our environment.
- Help not-for-profits, clubs and charities fundraise and make a difference in their community.

OUR VALUES



CUSTOMERS & COMMUNITY

We work closely with our customers and the community to safely deliver accessible services and opportunities



INTEGRITY

Courage, honesty and resilience underpin our culture, relationships, behaviour and decision-making



OWNERSHIP & ACCOUNTABILITY

We take responsibility for our actions so we can deliver on our goals



ENVIRONMENT & SUSTAINABILITY

We protect and enhance WA's environment by delivering a sustainable, world-class Scheme



RESPECT

The core of our relationships - we value our people and stakeholders and treat them with professionalism and respect

WHAT WE HAVE ACHIEVED IN OUR FIRST NINE MONTHS OF OPERATIONS



213 SITES



85 CDS SERVICES OPERATED BY SOCIAL ENTERPRISES



REFUND POINT OPERATOR (RPO) VOLUMES 425M



MATERIAL RECOVERY FACILITIES (MRF) VOLUMES 147M

	GREAT SOUTHERN	KIMBERLEY	MIDWEST	PEEL	PERTH	PILBARA	SOUTHWEST	WHEATBELT	GRAND TOTAL
Total Employees	28	26	129	39	232	75	148	56	733
Apprentices or Trainees	4	0	7	0	3	0	7	0	21



ALUMINIUM
3,106 Tonnes



GLASS
55,325 Tonnes



PET
3,980 Tonnes



LIQUID PAPER BOARD
22 Tonnes



MIXED PLASTIC
3,788 Tonnes



HDPE
1,599 Tonnes

WHAT IS MODERN SLAVERY

WARRRL opposes slavery in all its forms. The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

Modern slavery is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers.

However, these practices are also illegal and harmful and may be present in some situations of modern slavery.

These practices may also escalate into modern slavery if not addressed.

This is our first statement issued under the *Australian Modern Slavery Act 2018 (Cth)*. It has been prepared to meet the requirements of the Act.

OUR STATEMENT

WARRRL will not tolerate any form of modern slavery in connection with its operations.

As the appointed Coordinator of the container deposit scheme in Western Australia, we are aware of our responsibilities when working and interacting with our customers, clients, partners, employees, contractors and those with whom we have an agreement to carry out certain tasks associated with Containers for Change.

WARRRL is committed to promoting good labour standards and protecting human rights in our business and throughout our supply chain. We are aware that forced labour and human trafficking in our supply chain is a risk for our business. We are committed to playing a role to eradicate modern slavery.

This statement was approved by the Board of Directors. It is signed by the CEO of WARRRL.

OUR STRUCTURE

CONTAINERS FOR CHANGE

WARRRL is the Coordinator of the container deposit scheme and was appointed by the WA State Government of Western Australia to operate Containers for Change. WARRRL has six functions under the leadership of the Chief Executive Officer who reports to WARRRL's Board.

The six heads of departments, the CEO and an executive assistant form the executive team at WARRRL, responsible for leading company operations.

OUR VALUES

WARRRL is committed to operating responsibly and maintaining a high ethical and social standing within the community.

One of our strategic goals is to uphold Scheme integrity and organisational governance ensuring that customers and beverage suppliers have a high degree of confidence in the Scheme and the cost attributed to each eligible container.

It is our values that will help drive our commitment to taking action to reduce the risk of modern slavery in our business and supply chain. These values are:

- Respect for community
- Creating opportunity
- Inclusiveness and diversity
- Partnership and innovation
- Accountability, transparency and integrity
- Sustainability.

Our commitment to upholding human rights is integral and inherent in these values. These values underpin the way we work. We are committed to processes that avoid complicity in modern slavery in our business or supply chain.

We support the Australian Government's position that modern slavery does not have a place in Australian business, community or the global supply chain.

FUNCTIONS OF THE COORDINATOR

The Coordinator statutory functions are stated in s. 47Z of the *Waste Avoidance and Resource Recovery Act 2007 (WA)*

47Z. Functions of Coordinator

1. The Coordinator's main function is to administer and provide governance for the scheme.
2. Without limiting subsection (1), the Coordinator has the following functions –
 - a. to enter into, and manage, supply agreements in order to ensure contributions are made to the costs of the scheme;
 - b. to establish and maintain databases of container approvals and scheme agreements;
 - c. to enter into, and manage, export rebate agreements;
 - d. to establish a network of refund points by entering into refund point agreements and, if directed to do so by the Minister, by acting as a refund point operator;
 - e. to enter into, and manage, refund point agreements;
 - f. to enter into, and manage, material recovery agreements;
 - g. to ensure arrangements are in place for –
 - i. returning and collecting containers; and
 - ii. handling, sorting, processing, verifying, transporting and recycling containers that have been returned to a refund point or collected or received by an MRF operator;
 - h. to determine the amounts payable under the scheme to and by the Coordinator under scheme agreements;
 - i. to make and receive the payments referred to in paragraph (h);
 - j. to ensure arrangements are in place for verifying the validity of payments claimed and made under the scheme;
 - k. to raise and maintain public awareness of the scheme, including how the scheme operates and the location of refund points;
 - l. to receive and deal with complaints relating to the scheme from members of the public and entities participating in the scheme;
 - m. to obtain data on recycling rates for containers prior to the commencement of the scheme and throughout its operation in order to measure the outcomes of the scheme;
 - n. any other functions given under this Act or another Act.

OUR SUPPLY CHAIN

We have also reviewed the expenditure of the Company and identified the following products that may pose an elevated risk of modern slavery.

These products include:

- Office supplies (coffee, stationary etc)
- Office consumables (eg. Computers etc)
- Service providers (eg. Cleaning, contractors, office supplies, rent, etc)

Our analysis indicates that our suppliers are largely onshore. However, we do have some exposures to office consumables. We have undertaken steps to understand the first tier of our supply chain and we continue our work on understanding the geographical risks in our supply chain.

OUR OPERATIONS

The Western Australian Container Deposit Scheme commenced on 1 October 2020. The Scheme provides an incentive for members of the public to collect and return containers for recycling, in exchange for a refund amount.

WARRRL is responsible for the governance and administration of the Scheme on a day-to-day basis. To support the delivery of the Scheme coordinator function, WARRRL has engaged several third parties to leverage specialist expertise, external efficiencies and to support the Board and management.

The Scheme is the most diverse in the country with the largest number of social enterprises and not for profit organisations and a comparatively lower number of large major corporations approved as refund point operators (RPO). RPOs are the front facing part of the Scheme that provides the opportunity for the public to redeem their containers.

The geographical spread of the network involves a high number of refund points to service the State, with the highest ratio of refund points to population or any jurisdiction in Australia. Further to this, the focus on maximising community benefit from the Scheme across indigenous engagement, employment of people who live with a disability and long term unemployed is a key focus for WARRRL. Local participation in the Scheme requires a higher level of support. To ensure optimal outcomes across the entire network the operations team have several functions, including:

- overseeing the refund point collection network to ensure Scheme objectives are met consistent with their obligations under the refund point agreement;
- managing the transportation, processing, and recycling of Scheme materials post redemption at refund points as well as management of the material recycling facility stream for eligible containers consistent with Scheme objectives;
- overseeing and ensuring product stewardship for the Scheme, including risk management oversight and compliance; and
- auditing Scheme participants, beverage suppliers, RPOs, MRFOs, exporters and other contracted parties

To ensure that WARRRL can harvest insights from Scheme operations a business intelligence function has been established to proactively analyse Scheme participation, redemption rates, network efficiency and potential risks.

RISKS

WARRRL has a broad footprint throughout Western Australia with a diverse array of business partners. These partnerships range from large corporations to small sole proprietor businesses and not for profit entities.

We recognise the risk of modern slavery can be found in any size entity. The composition of the majority of the RPOs within the Scheme does provide some mitigation against the presence of modern slavery as WARRRL does not engage with large corporations where their footprint may extend overseas or have extensive supply chains. This enables WARRRL to have more transparency over the operations of many business partners.

We are however committed to understanding the risks of modern slavery within our operations and supply chain. As a result, we are developing a due diligence that is based in a risk assessment framework.

Within WARRRL, we have undertaken a risk review and the initial analysis identifies the relationship with offshore recyclers who participate in the Scheme to purchase redeemed product. The number of businesses partners who are identified within this category is small.

ACTIONS TO ADDRESS RISKS

At the time of this submission WARRRL has been in operations for 14 months. As a result, we are continuing to develop processes and practices to assess risk and develop actions.

WARRRL's approach to understand the risks of modern slavery incidents in our business and supply chain involved firstly understanding our risk profile in our supply base. This has involved processes such as a literature review of products and services received by WARRRL and the risks those pose within an Australian context.

We have commenced gathering information about our suppliers as set out in our procurement policy. This policy provides for risk mitigation and compliance with regulatory requirements and places requirements upon suppliers to act ethically and responsibly.

We are committed to improving the awareness of staff who work for WARRRL. Training occurred in 2020 that looked at topics such as what is modern slavery, the international context of modern slavery, how modern slavery relates to Australia and an overview of the Act.

More specifically, we have reviewed our Scheme participant agreements.

WARRRL has entered into a number of standard template agreements with Scheme participants, and these agreements include a clause that deals with Modern Slavery. A copy of these standard agreements can be found on our website at <https://warrri.com.au/reporting-agreements/>.

The clause requires the contracted party to represent, warrant and undertake:

- (a) that no form of modern slavery is used in the contracted party's business or by its directors, officers, employees, agents, representatives, contractors or subcontractors;
- (b) to comply with all applicable employment and work health and safety laws;
- (c) to comply with all applicable statutory requirements relating to modern slavery, including but not limited to any imposed by the Commonwealth Act;
- (d) to include, in each of its contracts with its subcontractors and/or suppliers, anti-slavery provisions that are at least as onerous as those set out in this; and
- (e) to notify to the principal promptly upon becoming aware of any incident, complaint or allegation that the contracted party, or any entity in its supply chain, has engaged in modern slavery.

OUR AGREEMENTS

WARRRL recognises that modern slavery is a worldwide issue. We also recognise that to address the challenges of modern slavery, collaboration with our business partners is needed.

WARRRL works in collaboration with key business partners to deliver Containers for Change in Western Australia.

Below is a summary of the agreements with WARRRL, of which all are standard template agreements that include the clause relating to Modern Slavery:

SUPPLY AGREEMENTS	421
REFUND POINT AGREEMENTS	74
BOTTLE CRUSHERS AGREEMENTS	2
MATERIAL RECOVERY AGREEMENTS	6
EXPORT REBATE AGREEMENTS	12
AGREEMENTS WITH PROCESSORS	4
AGREEMENTS WITH LOGISTICS PROVIDERS	5
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OUR POLICIES AND PROCEDURES

WARRRL employees are expected to practise the highest ethical standards at all times and to operate in compliance with all policies and laws that apply to the Company.

WARRRL has in place a number of policies that assist in protecting the human rights of our employees and within our supplier operations. These policies and procedures include:

- Company code of conduct policy
- Whistleblower policy
- Procurement policy
- Employment policy

WARRRL provides mechanisms for employees, contractors and third parties to raise grievances.

The Whistleblower Policy sets out the process for confidential reporting without fear of retaliation.

Grievances reported under this policy are reviewed and investigations are undertaken to identify appropriate actions are taken.

WARRRL is committed to high standards of corporate governance. We promote sustainable business practices. Our Board, Committees and leadership provide the direction to implement sound governance across the Company so that all decisions and actions are based on transparency, integrity and responsibility.

REVIEW, REFLECTION AND LESSONS LEARNT

We are committed to continuous improvement and have continued to review, reflect and learn from our experiences.

At the time of this submission, we have not identified any incident of modern slavery that is operating with the Scheme or in our supply chain.

We will continue to refine the way we assess the incidents of modern slavery within our business and supply chain. We are committed to conducting risk assessments upon all business partners and continue to train staff so they may be best prepared to identify and act. We will also review our due diligence processes.

In summary:

- WARRRL will consider the impact of any person that is a victim of modern slavery who is working for WARRRL or on its behalf. WARRRL will support the person in reporting the concern to the appropriate authority.
- WARRRL will continue to work with all its partners to enforce the modern slavery clause in all its agreements.
- WARRRL will provide staff with additional training to help employees identify any human rights risks.

APPROVALS

This statement was approved by WARRRL's Board on 13 December 2021.



Tim Cusack

Chief Executive Officer
WA Return Recycle Renew Limited



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