

JR RICHARDS & SONS

MODERN SLAVERY STATEMENT 2021

This statement discloses the actions taken by JR Richards & Sons Group (**JRR**) to address modern slavery risks related to our business and to implement, maintain and review associated processes during the year ending 30 June 2021. This statement is intended to comply with the requirements of the Australian Government's *Modern Slavery Act 2018* (Cth) (**the Act**).

OUR BUSINESS

JRR provides a wide range of commercial, liquid, industrial and residential waste related services throughout New South Wales and Victoria. JRR's operations also encompass related equipment design, maintenance and fabrication. Since establishing in 1958, JRR has endeavoured to provide cost effective waste and recycling solutions to Australians. JRR employs over 500 people across New South Wales and Victoria.

JRR is aware of the many forms of modern slavery in Australia and around the world, including human trafficking, servitude, forced labour, debt bondage, forced marriage and child labour. An awareness of the forms of modern slavery helps JRR to identify risk factors within our business structure, operations and supply chains.

CONSULTATION WITH RELATED ENTITIES

This Statement is given on behalf of **JR & EG Richards Pty Ltd** and **JR & EG Richards (NSW) Pty Ltd**. As both companies substantially operate in the same sector and have many shared suppliers, both entities share the same policies and processes to manage modern slavery risks. Furthermore, the two entities share the same board of directors and CEO, which allowed the entities to develop this Statement with both company's operations in mind.

OUR STRUCTURE, OPERATIONS & SUPPLY CHAINS

Our business activities include, but are not limited to the:

- supply of domestic waste and recycling collection services for New South Wales and Victorian local government areas;
- supply of commercial waste and recycling collection services;

JR RICHARDS & SONS

MODERN SLAVERY STATEMENT 2021

- supply of specialised mining services and total waste management solutions;
- supply of liquid waste collection services and treatment facilities;
- collection of organics and reprocessing to produce mulch and compost products; and
- design and manufacture of waste receptacles and compaction equipment.

OUR APPROACH

At JRR we are committed to approach every aspect of our business operations with respect, integrity and accountability. This is especially so with respect to our employees, contractors and persons our operations may impact on. We have a variety of policies that represent our approach to provide legally compliant and ethical companywide conduct.

Our Workplace Health and Safety Policy (**WHS Policy**), for example, seeks to promote the highest degree of safety, health and wellbeing of our staff, contractors and those our operations may impact upon. The scope of this policy extends to ensuring our staff, contractors and persons impacted by our operations are not exposed to human rights violations, including, modern slavery. The policy also outlines the special protections to be given to stakeholders who make disclosures about misconduct, breaches of any international, federal or state laws, general wrongdoing, or the like by the company, including JRR's officers and its employees.

RISK IDENTIFICATION

In 2019, with close regard to the Commonwealth *Modern Slavery Act 2018 – Guidance for Reporting Entities* document (**Guidance Document**), JRR's management sought to carry out a due diligence review of its business to identify, prevent, mitigate and account for how JRR can address the potential risks of modern slavery practices across our operations and supply chains.

The Guidance Document assisted us in identifying risk areas that could be exposed to modern slavery practices, including areas such as: JRR operational employees and management employees, the supply of products and materials from overseas (where there may be a greater risk of exposure to modern slavery practices and reduced human rights regulation), etc.

JR RICHARDS & SONS

MODERN SLAVERY STATEMENT 2021

We identified risks posed through our supply chains are minimised considerably as all plant, equipment and materials are procured locally in Australia. However, we are aware that the Australian companies we contract with may ultimately source products and materials from overseas.

Our risk is further reduced as JRR does not engage in any offshore dumping or international waste storage. We are passionate about our environment and are constantly looking at ways to minimise our footprint and achieve sustainability. JRR conducts ethical waste storage entirely within Australia.

ACTION TAKEN TO ADDRESS THE RISKS

With respect to addressing JRR's operational and management employees, JRR broadened the scope of its WHS Policy. Our WHS Policy was updated to provide for a direct commitment to preventing modern slavery in our operations as well as providing for special protections for whistle-blowers. In application, this involved providing training for appropriate staff about modern slavery, including but not limited to, defining the term, personal indicators of exposure, vulnerable aspects of our operations and supply chain and procedures for incident reporting.

JRR expects all employees and suppliers to operated in compliance with the Act. In this regard, JRR will consider implementing appropriate contractual obligations mandating this requirement where necessary.

JRR conducts due diligence when establishing relationships with suppliers, which includes assessing each supplier's reputation, their compliance with health, safety and environment standards, their respect for and compliance with the law, etc.

KNOWN OFFENCES AND RESPONSE

We are unaware of any of our suppliers engaging in modern slavery activities. However, if we become aware of such activities, we will immediately report the activity to the authorities and initiate an immediate proportional response with the offending party.

JR RICHARDS & SONS

MODERN SLAVERY STATEMENT 2021

IMPACTS OF COVID-19

Due to the essential nature of JRR's operations, we have fortunately not been adversely affected by the COVID-19 pandemic. JRR's employee work conditions, business operations and supply chains have not needed restructuring. Despite this, we have implemented a COVID-19 safe work environment including social distancing, organisation wide flu vaccinations and remote meetings and training.

CONTINUOUS IMPROVEMENT

JRR will continue to analyse any risks to the exposure of modern slavery caused or contributed to by our business operations and supply chains. We have learned a great deal from our first reporting year under the Act and are focussed on our continued training of employees to identify and manage modern slavery risks.

* * * * *

This statement has been approved and endorsed by the Boards of JR & EG Richards Pty Ltd and JR & EG Richards (NSW) Pty Ltd and the Chief Executive Officer of both companies.



Paul Welch

*Chief Executive Officer of
both companies*

Dated 17 January 2022



Ken Richards

Chairman of both Boards

Dated 17 January 2022