

This Modern Slavery Statement covers the activities of Tomra Cleanaway Pty Ltd (“Tomra Cleanaway”), during our financial year ended 30 June 2020 (“FY20”), to identify and mitigate any potential modern slavery risks in Tomra Cleanaway’s operations and supply chain.

1 – Introduction

Tomra Cleanaway is a joint venture between Cleanaway and TOMRA. Cleanaway is a leading waste management provider in Australia and listed on the ASX. TOMRA is a Norwegian listed company which invented the Reverse-vending machine. TOMRA Cleanaway operates as the Network Operator for Return and Earn, the NSW Container Deposit Scheme.

The joint venture manages a network of more than 630 collection points across NSW incorporating reverse-vending machines, automated depots and over-the-counter operators (small businesses).

As an Australian business generating annual revenue in excess of AU\$100 million, we acknowledge that Tomra Cleanaway is required to publish annual Modern Slavery Statements, in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) (“**Modern Slavery Act**”). This is Tomra Cleanaway’s first Modern Slavery Statement, which we have prepared in relation to FY20 (“**FY20 Modern Slavery Statement**”).

2 – What is modern slavery?

In this FY20 Modern Slavery Statement, the following terms have the following meanings:

- **modern slavery** refers to situations of serious exploitation, in which coercion, threats or deception are used to exploit victims and deprive them of their freedoms (including, amongst others, exploitative practices such as human trafficking, slavery, forced labour and child labour); and
- **modern slavery risk** refers to the prospect of a practice involving **modern slavery** occurring in a business’ operations and/or supply chain.

3 – Position statement

Tomra Cleanaway will not accept the existence of any form of **modern slavery** in connection with our business. We recognise our responsibility to work with our shareholders, customers, employees, suppliers, contractors, buyers of our recyclable commodities and all other relevant stakeholders, to identify and mitigate any **modern slavery risks** in our operations and supply chain.

4 – Our organisational structure

Tomra Cleanaway is an Australian private company. Tomra Cleanaway has two shareholders, being Cleanaway Pty Ltd and Tomra Europe AS. Tomra Cleanaway’s registered office is located at: 1A Raffles Glade Eastern Creek NSW 2766 Australia.

5 – Our business

5.1 – Operations

TOMRA Cleanaway provides container handling, transport, processing and recycling as well as data services as part of Return and Earn in NSW. A network of more than 630 collection points has been established across the state incorporating reverse-vending machines, automated depots and over-the-counter operators (small businesses). Each of these collection points enables citizens to redeem beverage containers and receive a 10 cents per container refund.

TOMRA operates the reverse vending network, provides technology to third party operators and provides software and data services. Cleanaway provides logistics, sorting of collected material and disposal of the recyclable commodities.

For further information about Tomra Cleanaway’s operations, please refer to Tomra Cleanaway’s website (www.tomracleanaway.com.au).

5.2 – Supply chain

Tomra Cleanaway’s Management focussed on the following key categories of third-party expenditure as part of the Risk Assessment (defined in Section 6.1 of this FY20 Modern Slavery Statement below) conducted during FY20:

Category	Details
Technology and assets acquired for use in the scheme	Consistent with standard commercial practice, Tomra Cleanaway facilitates the procurement of technology and assets for use in its operations.
Outsourced specialist services	As a joint venture formed to deliver a specific contract, Tomra Cleanaway makes use of services provided by both of its shareholders. In addition, Tomra Cleanaway receives corporate services and support from Cleanaway Pty Ltd.

6 – Our approach: risk assessment and mitigation

6.1 – Overview

In preparation for compliance with the Modern Slavery Act (including publication of this FY20 Modern Slavery Statement), during FY20, Tomra Cleanaway’s Management:

1. conducted an assessment of the **modern slavery risks** which are presented by Tomra Cleanaway’s unique operations and supply chain (“**Risk Assessment**”); and
2. took various actions, to mitigate the potential **modern slavery risks** which we identified as part of the Risk Assessment (“**Actions**”).

Further details of the potential **modern slavery risks** which we identified as part of the Risk Assessment and the Actions which we took to mitigate those **modern slavery risks** are outlined in Sections 6.2 (Risk Assessment) and 6.3 (Actions) of this FY20 Modern Slavery Statement below.

6.2 – Risk Assessment: potential modern slavery risks

The Risk Assessment identified the following potential **modern slavery risks** in relation to Tomra Cleanaway’s operations and supply chain:

Area of business	Modern slavery risk	Description of modern slavery risk
Operations	Commodity risks	That recyclable commodities which Tomra Cleanaway procures are sold to buyers who (either themselves or indirectly through others) engage in any practices which might be considered to constitute modern slavery .
Operations & Supply chain	Workforce risks	That any person in Tomra Cleanaway’s workforce, is subject to any conditions which might be considered to constitute modern slavery .
Supply chain	Supply chain risks	That there are modern slavery risks in the operations and/or supply chains of Tomra Cleanaway’s various contractors and suppliers: <ul style="list-style-type: none"> • supply of technology – the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, due to the technical nature of these goods and the strong reputations of the supplier (TOMRA);

Area of business	Modern slavery risk	Description of modern slavery risk
		<ul style="list-style-type: none"> • specialist logistics service providers – the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, given that Tomra Cleanaway’s various service providers are well-reputed professionals in their respective fields and are physically located in Australia; • collection point partners – the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, given that Tomra Cleanaway’s various partners are small businesses and community organisations which are physically located in Australia;

6.3– Actions: mitigation of potential modern slavery risks

During FY20, Tomra Cleanaway took the following Actions to mitigate the potential **modern slavery risks** which we identified as part of the Risk Assessment (see Section 6.2 above):

Area of business	Modern slavery risk	Action(s) taken to mitigate modern slavery risk
Operations	Commodity risks	<p>Cleanaway performs the role of Commodity Trading for TOMRA Cleanaway. During FY20, Cleanaway’s Management took the following Actions to mitigate the “Commodity risks” referred to in Section 6.2 above:</p> <ul style="list-style-type: none"> • Desktop due diligence • Contractual protections • Modern Slavery Questionnaire <p>Refer to Cleanaway’s Modern Slavery Statement attached to this Statement</p>
Operations & Supply chain	Workforce risks	<p>During FY20, Tomra Cleanaway’s Management took the following Actions to mitigate the “Workforce risks” referred to in Section 6.2 above:</p> <ul style="list-style-type: none"> • Employees (i.e. Operations) – Tomra Cleanaway’s Management conducted due diligence into Tomra Cleanaway’s employment practices and contracts with its employees, in an effort to ensure that Tomra Cleanaway’s employees are not subject to any conditions which might be considered to constitute modern slavery; and

Area of business	Modern slavery risk	Action(s) taken to mitigate modern slavery risk
Supply chain	Supply chain risks	<p>During FY20, Tomra Cleanaway’s management took the following Actions to mitigate the “Supply chain risks” referred to in Section 6.2 above:</p> <ul style="list-style-type: none"> • Supply of technology – refer to TOMRA Systems Corporate Responsibility Statement attached. TOMRA’s local subsidiary, TOMRA Collections Solutions, does not meet the reporting threshold however is subject to this group document; and • Specialist logistics service providers – refer to Cleanaway’s Modern Slavery Statement attached.

6.4 – Effectiveness of Actions

As at the date of this FY20 Modern Slavery Statement, we have not yet identified any material incidents of **modern slavery** occurring in our operations and/or supply chain and are therefore satisfied with the adequacy of the Actions which we took during FY20, to mitigate the potential **modern slavery risks** which were identified as part of the Risk Assessment.

7 – Impact of COVID-19

In response to the “[Modern Slavery Act: Information for reporting entities about the impacts of coronavirus](#)” guidance which the Department of Home Affairs published on 21 April 2020, we note that:

1. the novel coronavirus (“COVID-19”) pandemic did not impede Tomra Cleanaway’s ability to conduct the Risk Assessment, complete the Actions or prepare this Modern Slavery Statement;
2. we have maintained our supplier relationships and fostered open communication with our suppliers about COVID-19 risks; and
3. we introduced a number of safety measures into our operations, in an effort to ensure that we could continue running our business during the COVID-19 pandemic, whilst also ensuring the safety, health and wellbeing of all Tomra Cleanaway staff, contractors, customers and members of the public.

As at the date of this FY20 Modern Slavery Statement, we are not aware of the COVID-19 pandemic having caused any additional **modern slavery risks** in our operations and/or supply chain.

8 – Our plans for FY21

During FY21, we plan to:

1. review the identification (and mitigation) of potential **modern slavery risks**, prioritising our activities based on:
 - i. the identification (and mitigation) of any new **modern slavery risks** which arise in our operations and/or supply chain; and
 - ii. any inadequacies which we identify in relation to the ability for our existing Actions to appropriately mitigate the potential **modern slavery risks** which we have identified (and will, in the future, identify) in relation to our operations and/or supply chain.



Markus Fraval
Director
31 March 2021

This FY20 Modern Slavery Statement has been approved by the Board of Directors of Tomra Cleanaway Pty Ltd.

Annexure A: Cleanaway Modern Slavery Statement
 Annexure B: TOMRA Corporate Responsibility Statement