

MODERN SLAVERY STATEMENT (FY) 2022



*At locations within scope as per schedule.



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REVISION HISTORY

Version	Revision date	Authorised by	Comments
1.0	February 2021	Directors	First Modern Safety Statement FY 2020
2.0	February 2022	Directors	Document review
3.0	February 2023	Directors	Document review

1.0 INTRODUCTION

This Modern Slavery Statement is intended to comply with the requirements of the Modern Slavery Act 2018 - **(Cth) Modern Slavery Act**.

This statement is submitted as a joint statement for the Solo Group of companies reporting entities as defined in section 5 of the same Act.

2.0 BUSINESS ACTIVITIES

The Solo Group of companies' is an Australian owned and operated family business, which has operated since 1932. Established locally in 1990, Solo Resource Recovery offers a range of waste and resource recovery services to industry, commerce and homes throughout New South Wales, South Australia, Victoria, Western Australia and Queensland. These services include waste collection services, domestic, recycling and organics, liquid waste, waste water and sludge removal and treatment, industrial bins, medical waste transfer and industrial services, including underground asset locations and public utility planning as well as other customised waste management solutions.

The Group currently employs over 700 people nationally.

The size, nature, diversity and geographical locations of operations conducted by the Solo Group opens to risk as identified in the **Australian Modern Slavery Act 2018**.

The below reporting entities are under the control of the same integrated management system operating under the same policy directives from the same board of directors.

Reporting entities are listed in the following table.

Solo Resource Recovery
Solo Waste
Solo Water
Rico Recovery Systems
Richmond Waste Services
Pellet Heaters Australia

3.0 CONSULTATION WITH RELATED ENTITIES

A consultation process has been undertaken with all relevant current operational managers and training will be continually developed to ensure that people accountable are taking the appropriate steps to ensure compliance to the requirements of this statement and the associated policy directive.

The Company's goals, approaches and commitments towards ensuring that we work continually towards identifying and managing these risks are supported within our Modern Slavery Response Policy Statement.

3.1 MODERN SLAVERY RESPONSE POLICY STATEMENT

All employment with the Solo group, referred to hereafter as “The Company” is voluntary.

The Company does not use or condone, child or forced labour in any of its operations or premises and works to ensure these practices are not present in its workforce or supply chain.

The Company does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude.

The Company abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.

Where the Company is made aware of modern slavery practices by stakeholders or within its supply chain, the Company will investigate all claims and if valid, resolve the issue in line with the values expressed in this Policy.

The Company will provide training with the aim of educating applicable employees and contractors on signs that could indicate modern slavery, due diligence practices for engaging suppliers, auditing existing suppliers and what action an employee or contractor can take if they have a concern in relation to modern slavery.

The Company will conduct risk assessments to determine which parts of the business and supply chains are most at risk from modern slavery to ensure focus on those areas.

This Policy will be used to underpin and inform any statement on modern slavery that the Company is required to produce as a result of legislative requirements.

The Company expects its suppliers to have similar values to the Company in relation to modern slavery.

The Company engages with suppliers to promote and support anti-slavery practices throughout the wider supply chain.

The Company is committed to introducing anti-slavery obligations in all supplier contracts that present with a risk. As part of their contractual obligations, suppliers will agree to undertake a process so the Company can gauge the supplier’s ongoing commitment to eradicating modern slavery within its own business and those of its own suppliers.

4.0 KEY OPERATIONAL ACTIVITY

The Groups key operations and core business is within the waste management sector; however the groups activities are diverse and include the following.

4.1 WASTE MANAGEMENT

The Group delivers a range of waste management industry related services including:

- Municipal kerbside waste, recycling and organics collection.
- Commercial collection
- Industrial and liquid waste solutions
- Waste treatment, storage and processing, and
- Waste facility management including landfills, transfer stations and satellite waste hoppers.

4.2 INDUSTRIAL SERVICES

The Group specialises in a number of industrial services related activities including:

- Non destructive digging (NDD)
- Bulk liquid waste transport and disposal
- Asset location
- Drain cleaning
- High pressure water blasting
- CCTV Survey investigation and reporting
- Tank cleaning
- Civil infrastructure asset maintenance
- Geotechnical investigation
- Dredging and sludge removal, and
- Dangerous goods transport and management

4.3 WATER UTILITY PROVISION

The group has a water utility division that has projects managing water utility services including:

- Provision of potable drinking water
- Sewerage treatment, and
- Provision of recycled water.

4.4 DESIGN ENGINEERING AND MANUFACTURING

The group has a number of manufacturing and engineering arms that include:

- Design engineering and manufacturing of waste collection vehicles
- Design engineering and manufacturing of industrial services vehicles
- Engineering and manufacturing of skips, bins, compactors and related products, and
- Manufacturing of wood pellet products.

5.0 SUPPLY CHAINS

The Group sources its external supply chain required products from Australian providers at every opportunity and wherever possible providing a level of insulation against conducting business with supply chains that may source products from lesser regulated global economic regions.

The group's business divisions conducted an analysis during 2022 to identify and assess risks of modern slavery practices that may be present in relation to our supply chain and business operations.

6.0 APPROACH AND STRATEGY

The Group will perform due diligence when engaging service providers, contractors and supplier contracts through the implementation of the groups Modern Slavery Management Plan.

Managers acknowledge that they are accountable for addressing modern slavery issues within their operations when engaging service providers, contractors and supplier contracts.

The principles of the Modern Slavery Response Policy Statement are to be complied with and or incorporated into related policies and procedures within all areas of the business.

The policy applies to all persons working for, on behalf of, or providing services to, the Solo Group of companies in any capacity, including:

- Management
- Employees
- Suppliers
- Contractors
- Consultants and any other third-party representatives

The Group expects that all who have, or seek, a relationship with the Solo Group to familiarise themselves with this Policy and to act in a way that is consistent with its values.

7.0 MODERN SLAVERY RISK MANAGEMENT AND MINIMUM STANDARDS

7.1 ACCOUNTABILITY

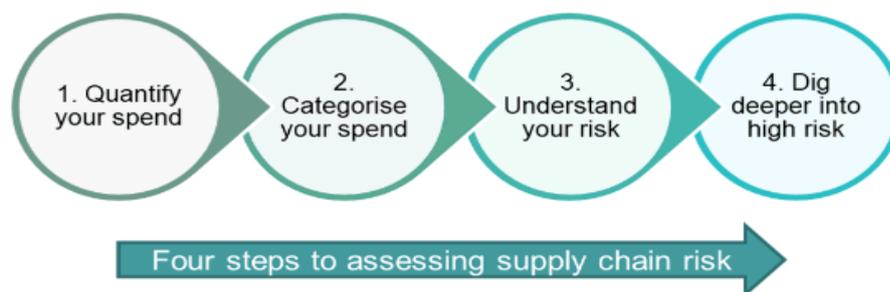
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Managers acknowledge that they are accountable for addressing modern slavery issues within their operations when engaging service providers, contractors and supplier contracts.

7.2 RISK ASSESSMENT STRATEGY

The Company will assess the risk in relation to Modern Slavery Legislation firstly at a national level using a spend analysis to identify relationships with organisations that are at a higher risk of being connected to implications of modern slavery practices.

This will be achieved by conducting the following process.



7.2.1 QUANTIFYING RISK

All of our suppliers are categorised according to the amount that the company spends with them. Risk can be characterised as a combination of spend and potential exposure to modern slavery practices.

7.2.2 CATEGORISING RISK

Suppliers are sorted into categories determine by what they are supplying, goods or services. The risk is then determined by the amount of spend in the following categories:

- Category A - \geq \$1,000,000.00
- Category B - \geq \$500,000.00
- Category C - \geq \$100,000.00

7.2.3 UNDERSTAND THE RISK

The company will request specific information from categorised suppliers that will assist in determining the level of risk of modern slavery practices that may be inherent with the supplier. This could be as simple as sending them a questionnaire and a request for information.

For example, if a company has a high spend category and limited policy, or procedure for managing compliance around modern slavery, further information or evidence may be required of that supplier.

7.2.4 MANAGING THE RISK

Focussing on the suppliers listed in the aforementioned categories that have been identified as having the most significant risk of modern slavery implications, the company will undertake a more specific and detailed risk assessment, or for the largest and riskiest suppliers, undertaking a site-based audit.

Questions asked and evidence required will relate to things such as the nature of their workforce, and what policies or management systems they have in place along with how they manage their own supply chain.

8.0 MONITORING OF EFFECTIVENESS

The Solo Group will continue to monitor the effectiveness of implemented strategies to identify risks of modern slavery and act on any incidences where modern slavery practices are detected within our operations or supply chains.

The solo Group will review its implemented Modern Slavery Management Plan annually and communicate when and as required to ensure compliance to the policy directive and the Australian Modern Slavery Act.

9.0 AUTHORISATION

This statement has been approved and endorsed by the Solo Group Board of Directors on the 1st of February 2023.

Robert Richards (Managing Director)



Gillian Richards (Director)



Rhys Richards (Director)