

Modern Slavery Statement
FY2024-2025



Contents

Reporting Criteria	1
1. Reporting Entity	2
2. Structure, Operations, and Supply Chains	3
3. Identifying and Assessing Modern Slavery Risks	5
4. Actions Taken to Address Modern Slavery Risks	6
5. Effectiveness of Actions Taken	7
6. Consultation Process	8
Annex 1	9
Related Entities	9

Reporting Criteria

Modern Slavery Reporting Criteria	Relevant Section
1. Identify Reporting Entity	Page 2
2. Describe the reporting entity's structure, operations and supply chains	Page 3-4
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Page 5
4. The actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks	Page 6
5. How the reporting entity assesses the effectiveness of such actions	Page 7
6. The process of consultation with any entities the reporting entity owns or controls or is issuing a joint modern slavery statement with	Page 8
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A

1. Reporting Entity

Re.Hold Pty Ltd

ACN: 616 411 217

Registered Office: Suite 1, Level 19, 100 Miller Street, North Sydney, NSW 2060

Website: www.re-group.com

Introduction

This modern slavery statement is made by Re.Hold Pty Ltd for its related entities (see annex 1 for full list ("**Related Entities**")) for the financial year ending 2025, pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (the "**Act**"). The statement outlines the steps we have taken to assess and address the risks of modern slavery in our operations and supply chains.

2. Structure, Operations, and Supply Chains

Structure

Re.Hold Pty Ltd is the ultimate parent company of multiple entity groups. This includes Re.Cycle Material Recovery Facilities, Re.Grow FOGO Processing, Return-It Container Deposit Schemes (CDS), Re.Collect Container Collection and the groups engineering company, Recycling & Design Technologies (RDT) Engineering (see full list of entities in **Annex 1** of this statement). Re.Hold Pty Ltd and its Related Entities set out in **Annex 1** are together referred to as “**Re.Group**”.

Operations

Re.Group operates the largest network of recycling facilities across Australia. Founded in 2013, Re.Group has expanded to deepen the impact of our recycling work around Australia and New Zealand.

Through Re.Cycle, we develop, operate and maintain industry leading material recovery facilities (MRFs) which process ‘yellow bin’ household collected material across Australia and in New Zealand. Re.Cycle processes kerbside co-mingled waste to recover and effectively extend the life of material into the products such as cardboard, mixed paper, ferrous metals, non-ferrous metals, HDPE, PET plastics and glass. Re.Grow also develops, manages and operates innovative food organics and garden organics processing facilities.

Via Return.IT, we offer a modern and convenient way to collect eligible containers and pay back refund amounts, while embracing both our customers and charity groups as part of the recycling collection system. We are the network operator for the ACT CDS, collecting containers in the nation’s capital, the major operator in the Queensland Container Refund Scheme (CRS), have a number of points in NSW and since 2023 have been one of the network operators of the CDS Victoria operating refund points in the Southern Melbourne and Gippsland regions. Through Re.Collect, we provide an option for individuals to book a pickup, have their rubbish picked up and get their refunds back all from one place.

RDT is our in-house design and engineering team focused on developing new resource recovery facilities across Australia and New Zealand, as well as up-grades and enhancements to existing recycling infrastructure. RDT specialises in adapting leading international recycling equipment and services to suit local Australian and New Zealand installations.

Supply Chain

Re.Group's supply chain involves the procurement of various goods and services crucial for recycling and resource recovery operations. This includes but is not limited to purchasing equipment such as conveyors, balers, mobile plant machinery, along with safety and personal protective equipment for employees. Re.Group also source materials for office operations and engages services like waste management consulting, maintenance and IT support. Re.Group sources goods and services both in Australia and internationally.

3. Identifying and Assessing Modern Slavery Risks

Re.Group acknowledge that modern slavery is a global issue and that it exists in many supply chains. Re.Group has a zero-tolerance approach to modern slavery.

Re.Group's operations are carried out in Australia and New Zealand only. Its employees are based in these countries and receive a contract of employment. Our recruitment and HR processes include reviews of any potential employees' eligibility to work in Australia or New Zealand (as applicable). Employees are paid fair wages that meet or exceed legal minimum wage standards and other applicable regulatory assessments. Fair working conditions are provided in accordance with relevant local laws. If we engage employment agencies, such engagement is governed by a contractual relationship. Re.Group's operations do not extend to other countries where the risk of slavery may be higher. Re.Group's assessment of modern slavery in its operations is low.

Re.Group identifies risks of modern slavery in its first-tier supply chain through its procurement process. Re.Group sources goods and services both from within Australia and internationally. Re.Group recognises that the risk of modern slavery is present in any supply chain. Current control measures, to place lower risk on the exploitation of modern slavery in our first-tier supply chain, are set out in section 4 of this statement.

In the last financial year, we have been and will continue to review our processes and protocols for identifying and assessing modern slavery risks within our supply chain, see section 5 of this statement for further details.

4. Actions Taken to Address Modern Slavery Risks

Re.Group have taken actions to address and mitigate the risks of modern slavery, including:

- 1. Supplier Code of Conduct :** We have created and implemented a supplier code of conduct which outlines the minimum expectations of suppliers and subcontractors (and their supply chains). Adherence to the code is mandatory for all suppliers who wish to establish and maintain a business relationship with Re.Group. Suppliers are required to agree to this code of conduct during the onboarding process. Suppliers' ability to meet or exceed these minimum requirements are considered when making procurement decisions.
- 2. HR policies:** We are in the initial stages of implementing a human rights and modern slavery policy to help prevent, detect and respond with mitigating controls to the risk of Modern Slavery occurring within Re.Group. As part of this policy, we are reviewing our procedures and processes to further reduce risk of modern slavery in our supply chain.
- 3. Modern Slavery Questionnaire:** Re.Group have created and implemented a Modern Slavery Questionnaire which must be completed by all suppliers during the onboarding process. This helps Re.Group to identify how the supplier identifies modern slavery risks in its own supply chain and operations and the actions that the supplier takes to reduce the risk. The Supplier's answers to this questionnaire are considered when deciding whether to onboard them as a supplier.
- 4. Revision of Procurement Policy:** In the FY2024-2025, Re.Group has reviewed its procurement policy and has been working on refining it with the aim of ensuring that all entities within Re.Group follow the same process when using suppliers. This helps to ensure that all suppliers used by Re.Group are those that have been onboarded following the same process, such as completion of the modern slavery questionnaire and agreement to the supplier code of conduct. The updated procurement policy is in the final stages of being drafted and we expect it to be implemented by 31 December 2025.

5. Effectiveness of Actions Taken

We will assess and monitor the procedures that we have in place to mitigate the risks of modern slavery and human trafficking, such assessments shall include:

- Reviewing modern slavery questionnaires completed by suppliers as part of the onboarding process to obtain details of actions taken by the supplier to manage and address modern slavery risks in their supply chain;
- Ensuring all suppliers who are onboarding agree to the supplier code of conduct and engage with existing suppliers to obtain their declaration to the code;
- Administering breaches of contractual arrangements through the breach provisions of each contract; and
- Monitoring and assessing compliance with internal procurement policies and use of approved suppliers.

Future Action

In the future reporting periods, we aim to further enhance our policies and procedures, such initiatives include:

- Implementing the revised procurement policy and training employees on the policy to ensure compliance.
- Reviewing existing suppliers, obtaining completion of modern slavery questionnaires and declarations to the code of conduct.
- Continue to refine our procurement process to include more granular information and declarations in relation to the supply chain of our key suppliers.
- Enhancing our risk assessment tools to better identify and mitigate risks.
- Implement ongoing monitoring and auditing processes to ensure that our suppliers remain compliant with modern slavery standards.
- Implement training across the management teams of Re.Group and its Related Entities to understand what modern slavery is and how to mitigate it.

6. Consultation Process

This statement has been approved by the board of directors of Re.Hold Pty Ltd, the ultimate holding company for the group of Related Entities detailed in Annex 1, and it has been reviewed by senior management of Re.Group . It applies to the activities of the entities detailed in Annex 1.

Approval

This statement has been approved by the Board of Directors of Re.Hold Pty Ltd, the ultimate holding company for the group of Related Entities detailed in Annex 1 on 18 November 2025.

Signed

A handwritten signature in black ink, appearing to read 'D Singh', written over a light blue rectangular background.

David Singh
Managing Director of
Re.Hold Pty Ltd and its Related Entities detailed in Annex 1

Date: 27 November 2025

Annex 1

Related Entities

- Re.Group Finco Pty Ltd, ACN 616 417 488
- Re.Operate Pty Ltd, ACN 607 358 538
- Re.Cover Resources Pty Ltd, ACN 615 947 521
- Re.Fuel Group Pty Ltd, ACN 607 358 467
- Re.Turn It Pty Ltd, ACN 615 434 869
- Re.Group Pty Ltd, ACN 616 439 779
- Re.Invest Group Pty Ltd, ACN 607 358 369
- Re.Invest MRF Pty Ltd, ACN 607 358 609
- Re.Energy Pty Ltd, ACN 607 358 510
- Re.Cycle (Browns Plains) Pty Ltd, ACN 624 014 991
- Re.Cycle Operations (Mackay) Pty Ltd, ACN 602 778 147
- Re.Cycle (Townsville) Pty Ltd, ACN 614195505
- Re.Cycle Operations (Townsville) Pty Ltd, ACN 614195050
- Re.Cycle (Canberra) Pty Ltd, ACN 610 093 788
- Re.Cycle Operations (Canberra) Pty Ltd, ACN 610 379 078
- RDT Engineering Pty Ltd, ACN 108 273 981
- Re.Grow Pty Ltd, ACN 607 367 297
- Re.Grow (Shellharbour) Pty Ltd, ACN 613 887 899
- Re.Grow Operations (Shellharbour) Pty Ltd, ACN 620 045 098
- Re.Turn It (Canberra) Pty Ltd, ACN 623 237 687
- Re.Turn It (Canberra) Operations Pty Ltd, ACN 626 032 282
- Re.Turn It (Canberra) Depot Pty Ltd, ACN 626 032 522
- Re.TurnIt (Canberra) Collection Points PTY Limited, ACN 626 032 540
- Re.Turn It IT Co Pty Ltd, ACN 626 032 531
- Re.Turn IT Collect PTY LTD, ACN 626 032 291
- Re.Turn It (Queanbeyan) Pty Ltd, ACN 623 237 874
- Re.Turn It (Brisbane) Pty Ltd, ACN 627 480 353
- Re.Turn It (Queensland) Depot Pty Ltd, ACN 628 408 882
- Re.Turn It (WA CDS), ACN 630 323 769
- Re.Turn It (Victoria) Pty Ltd, ACN 664 532 325
- Re.Turn It (Victoria) Collection Points, ACN 666 187 033
- Re.Cycle (Adelaide) Pty Ltd, ACN 616 663 542
- Re.Cycle (Sunshine Coast) Pty Ltd, ACN 654 534 237
- Re.Cycle Operations Pty Ltd, ACN 656 197 134
- Re.Cycle Holdings Pty Ltd, ACN 656 196 244
- Re.Cycle (Auckland) Pty Ltd, 8528726; NZBN: 9429050972289
- Re.Hold Pty Ltd, ACN 616 411 217