



TOMRA Collection Pty Ltd

Modern Slavery
Statement
FY24

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TOMRA Collection Pty Ltd

Table of Contents

Table of Contents	2
Covering note from the CEO	3
Introduction	3
Criterion One: The reporting entity	3
Criterion Two: Structure, operations, and supply chains	4
Structure	4
Operations	4
Supply Chains	5
Criterion Three: Modern slavery risks assessment	6
Criterion Four: Actions taken, including due diligence and remediation	7
Criterion Five: Assessing the effectiveness of actions taken	8
Criterion Six: Consultation with subsidiary entities	9
Criterion Seven: Other relevant information	9
Approval	9

Covering note from the CEO

As CEO and on behalf of the Board of Directors, I am pleased to present TOMRA Collection Pty Ltd.'s Modern Slavery Statement covering the financial year 2024 reporting period. This statement has been formally reviewed and approved by the Board, demonstrating our commitment to identifying, assessing, and addressing modern slavery risks across our operations and supply chains, in line with our obligations under the Modern Slavery Act 2018 (Cth). We recognise that modern slavery is a serious violation of human rights and that combating it is essential to ensuring ethical, transparent, and sustainable business practices. In collaboration with TOMRA Global, we are developing our counter-slavery program and will continue and deepen that program year-on-year.

Tor Eirik Knutsen

CEO and Director, TOMRA Collection Pty Ltd

Introduction

The Australian **Modern Slavery Act 2018** (the Act) defines modern slavery as situations where coercion, threats or deception are used to exploit victims and undermine them of their freedom. It is used to describe eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

In financial year 2024 (FY24) Tomra Collection Pty Ltd met the mandatory reporting threshold under the Modern Slavery Act, making this our second formal modern slavery statement. Contained below, we follow the seven mandatory reporting criteria to outline the actions taken during the reporting period to understand and mitigate those risks, and to uphold our commitment to respecting human rights.

At TOMRA Collection Pty Ltd, we are committed to continuous improvement in proactively identifying, assessing, and mitigating modern slavery risks across our operations and supply chains.

Criterion One: The reporting entity

This Modern Slavery Statement has been prepared in accordance with the requirements of the Act. It is the first statement issued by TOMRA Collection Pty Ltd (TOMRA Collection Australia) - ABN 90 111 224 018 and covers the reporting period from **1 January 2024 to 31 December 2024**.

TOMRA Collection Australia, a proprietary limited company established in Australia in 2004, is headquartered in New South Wales and serves as the reporting entity under the Act. TOMRA Collection Australia provides automated technology for recycling drink containers, operating as a leader in reverse vending machines (RVMs) and container deposit schemes.

TOMRA Collection Australia reverse vending machines and modern depot facilities are deployed across hundreds of sites across Australia, mainly in retail car parks, shopping centres, and stand-alone recycling centres.

TOMRA Collection Australia is majority owned by TOMRA Systems ASA, which altogether has approximately 105,000 installations in over one hundred markets worldwide (see more detail in the following section). This statement covers only the operations of TOMRA Collection in Australia.

TOMRA Collection Pty Ltd



Employees

330



Number of Sites

661



Reverse Vending Machines

2,510



Locations

NSW, QLD,
WA, VIC, NT,
SA

Details as of 04 November 2025

Criterion Two: Structure, operations, and supply chains

Structure

TOMRA Collection Pty Ltd is the Australian subsidiary of the ultimate parent company, TOMRA Systems ASA (TOMRA Group) which is a publicly listed company headquartered in Norway founded in 1972. TOMRA Group operates worldwide through three core business divisions: Collection, Recycling, and Food. Within this structure, TOMRA Collection Australia forms part of the Collection division and represents the Australian operations of TOMRA Group's container-collection business.

TOMRA Sorting Pty Ltd (part of TOMRA Group's recycling division), TOMRA Cleanaway Pty Ltd (a joint venture operating under the Return and Earn scheme in New South Wales) and TOMRA Cleanaway (Victoria) (a joint venture operating under the VIC Return scheme in Victoria) are related entities to TOMRA Collection Australia as they share ownership in Norway but are not included within this statement as they are separate legal entities.

Operations

Our operations focus on managing automated container recycling through reverse vending machines and modern depot networks supporting state container deposit schemes in Australia.

- Providing reverse vending machines (RVMs) for automated bottles and can return, offering instant digital or cash-equivalent refunds for eligible beverage containers.
- Managing and servicing collection points including machine uptime, repairs, and customer engagement.
- Operating modern depots where customers return larger volumes of containers, which are aggregated and collected.
- Customer-facing interactions such as attending to customer queries through a Call Centre.
- Managing employee workforce involved in machine servicing, maintenance, and local administration.

Supply Chains

TOMRA Collection Australia operates a complex supply chain system to support our extensive network of automated container return points.

TOMRA Collection Australia works with a broad network of suppliers that we purchase and source from, with our direct (Tier 1) suppliers predominantly based in Australia and Norway. Our indirect suppliers (i.e. our suppliers' suppliers, or Tier 2 and beyond) are more geographically diverse. In FY24, we gained improved visibility into the origins of Tier 2 suppliers for our highest-spend Tier 1 suppliers, which are primarily located in China. Further analysis is needed to more comprehensively map our value chain, with this work planned for future reporting periods (See Criterion 4 below).

The industries we are mostly purchasing from, based on a high-level review of our spend data, include retail, cleaning and facilities services, waste, recruitment, construction, and leasing. The primary products we purchase include steel, electronics, merchandise, and signage.

Our supply chain analysis remains at a fairly high level, and we plan to conduct a more detailed geographic and industry-based human rights risk assessment in the next year or two.



Top Source Countries by Spend (Tier 1 suppliers)

- Australia
- Norway
- Germany

Top Tier-2 Supplier Countries (by Tier-1 Spend)

- China



Key Sourcing Industries based on Spend (Tier 1 suppliers)

- Retail
- Cleaning & Facilities Services
- Waste Management/Recycling
- Recruitment
- Construction
- Vehicle Leasing



Key Sourcing Products (Tier 1 suppliers)

- Steel
- Electronics Hardware
- Merchandise
- Computer and Electrical
- Stands and Signage

TOMRA Collection Australia maintains oversight of its supplier network across all operational areas. However, for reverse vending machine-related activities, supplier management and control are handled through parent entity, which limits Tomra Collection Australia's direct influence over these suppliers.

Criterion Three: Modern slavery risks assessment

We recognise that modern slavery risks exist in both our operations and supply chains. Looking first at our own operations in Australia, we have had no instances or reports of modern slavery occurring. However, we know no organisation is immune from modern slavery, regardless of the industry or operating location, and therefore must remain vigilant with a focus on self-reflection and continuous improvement of our controls and practices.

Looking at our supply chain, nearly all our direct Tier 1 suppliers are based in Australia, which is a relatively low-risk geography for modern slavery. However, we acknowledge that domestic sourcing can hide complex value chains that branch around the world. And even when a product or service originates from Australia, it is still possible to involve forms of modern slavery: recent estimates from the Global Slavery Index suggest there may be upwards of 40,000 people trapped in slavery in Australia today.

We know different industries in Australia come with different risk profiles for modern slavery, and see heightened risks in areas like subcontracting, low-wage labour markets, and the employment of migrant or vulnerable workers in sectors such as cleaning, maintenance, and construction.

TOMRA Group is a member of the United Nations Global Compact (UNGC) and TOMRA Collection Australia is committed to implementing the principles of UNGC through responsible business conduct. In FY23, we began a high-level desktop review of peer approaches to risk identification to better understand our operational and supply chain risks. Drawing on international human rights standards and datasets, including the UN Guiding Principles on Business and Human Rights (UNGPs), the ILO Fundamental Principles and Rights at Work, and the Global Slavery Index, we identified several higher-risk sectors listed below. These sectors remain relevant for FY24 and will be further assessed through a formal, expert-led risk assessment planned for FY25:

- Cleaning & Facilities Services
- Construction
- Logistics and Security
- Temporary Staffing & Recruitment Services
- Electronic Hardware

At a high level, the types of human rights risks potentially relevant to TOMRA Collection Australia, our extended value chain, and our business partners are likely the below, but require further investigation:

- Conditions of employment, including work hours, wages and benefits, and the right to organise/unionise
- Forced labour and the worst forms of child labour
- Harassment and discrimination
- Health and safety

Criterion Four: Actions taken, including due diligence and remediation

TOMRA Collection Australia is continuing to advance our counter-slavery response package based on last-year's work and upon the high-level risks identified in the prior section. Our efforts, to date, have focused mostly on policy and procedure improvements to better align our Australia practice with TOMRA Group's human rights efforts.

Firstly, we are working to align our human rights due diligence approach with TOMRA Group's framework, which is based on the OECD Guidelines for Responsible Business Conduct. This framework follows six key steps as outlined in [TOMRA Group's Commitment to Human Rights](#):

1. Embedding responsible business conduct into policies and management systems;
2. Identifying and assessing actual or potential adverse impacts within operations and supply chains;
3. Taking action to prevent or mitigate identified risks;
4. Tracking and recording implementation and outcomes;
5. Communicating how impacts are addressed; and
6. Enabling or cooperating in remediation where appropriate.

As part of efforts to embed responsible business conduct into policies, a Business Principles for Suppliers & Partners Policy was introduced by TOMRA Group in 2019. This policy serves as the Group's supplier code of conduct and sets out expectations around sustainability; human & labour rights; and health, safety, and the environment. It also reinforces compliance with anti-bribery and corruption standards and ethical business practices. Suppliers are required to provide accurate information, cooperate with assessments and due diligence reviews, and participate in ongoing monitoring through TOMRA Group's established tools, communications, and audits. TOMRA Collection Australia applies this Group policy by providing the Business Principles for Suppliers & Partners Policy to suppliers on initial engagement for review, confirmation and sign-off, and by regularly monitoring our due diligence system for supplier alerts and changes in beneficial ownership.

Further, TOMRA Group's Human & Labour Rights Policy sets clear expectations for ethical conduct and performance across its operations and supply chain. This policy is supported by TOMRA Group's remediation and grievance procedure, which provides avenues for concerns to be raised and addressed. An internal reporting portal is available to all employees and

stakeholders to confidentially report any behaviour inconsistent with TOMRA Group’s values, code of conduct, or applicable laws. TOMRA Collection Australia applies this Group policy by ensuring mandatory Compliance training is completed on a regular basis by all employees.

TOMRA Collection Australia applies an Integrity Due Diligence Policy to assess the compliance risks of customers, agents, projects, and suppliers above a 50,000 AUD spend threshold. Reviews are conducted through a global compliance platform. Where risks or “red flags” are identified, compliance officers assess the issue and recommend mitigating actions. Final approval of new suppliers’ rests with relevant business heads, and these reviews are undertaken quarterly.

As we advance along our counter-slavery journey, Tomra Collection Australia has developed an action plan to guide our future efforts:

Planned Action	Target Completion
Conduction Tier-1 Supplier Modern Slavery Risk Assessment	In Progress (FY25)
Middle and senior management to complete Modern Slavery Awareness Training	FY26
Establish Tomra Collection Australia, Human Rights Committee or Working Group	FY27
Establish a formal Human Rights Due Diligence Process	FY27
Develop a formal Remediation Process	FY27

Criterion Five: Assessing the effectiveness of actions taken

Tomra Collection Australia remains in our early stages of developing a formal and practiced process for assessing the effectiveness of our counter-slavery actions. However, we acknowledge the importance of doing so to ensure continuous improvement.

Over the coming reporting periods, we intend to develop measurable indicators to evaluate the impact of our counter-slavery activities, such as supplier risk assessment outcomes, completion rates for employee training, or the integration of modern slavery considerations into procurement processes. These measures will help us to monitor progress, identify gaps, and strengthen our overall response to modern slavery risks across our operations and supply chains.

Currently, our policies are continuously reviewed and updated to ensure they remain fit for purpose and aligned with TOMRA Group’s values and objectives. Group Compliance will periodically assess compliance performance as a key performance indicator (KPI) and report outcomes by division.

Criterion Six: Consultation with subsidiary entities

As the reporting entity does not own or control any other entities, a formal consultation process across multiple entities was not required for this reporting period. Although each entity operates independently, all TOMRA Group entities are governed by, and adhere to, Group policies, ensuring consistent application of the Group's governance principles across the organisation.

Internal consultation took place among relevant teams, including procurement, to support the preparation of this statement and ensure a shared understanding of our modern slavery obligations.

Looking ahead, we intend to extend engagement to key suppliers and industry peers to strengthen our collective response to modern slavery risks. These consultations will help inform us about future improvements to our risk management approach and the effectiveness of our actions.

Criterion Seven: Other relevant information

Nothing further to add.

Approval

This report was reviewed and endorsed on Date by TOMRA Collection Australia Board of Directors—the group's highest governing body—and is signed on the board's behalf of by the Chair of the Board Tor Eirik Knutsen.

