

# MODERN SLAVERY STATEMENT 2020



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*We acknowledge and pay our respect to Aboriginal and Torres Strait Islander Peoples as the First Peoples of Australia, whose ancestral lands and waters we work and live on.*

*We pay our respect to Elders past, present and emerging and acknowledge the cultural authority of all Aboriginal and Torres Strait Islander Peoples across Australia.*

# A MESSAGE FROM

## BINGO's Managing Director & CEO

### **I am pleased to present BINGO's first Modern Slavery Statement.**

BINGO spends almost \$400 million annually across more than 1,500 suppliers. To achieve BINGO's vision of a waste free Australia, we are highly dependent on working with the partners we use for downstream servicing of our waste streams, and also our upstream product and service providers.

We are committed to continuous improvement through maintaining responsible and transparent supply chains.

In FY20, we implemented a Responsible Sourcing Program across the business. The program included a comprehensive evaluation aimed at better understanding our supply chain and the potential risks of modern slavery from our operations. The evaluation included a 12-month external spend review, procurement documentation and policy assessment, development of relevant training and conducting on-site field assessments of key international suppliers in China and Vietnam.

In addition, we developed a Supplier Code of Conduct that sets out BINGO's expectations for our supply chain, and we made improvements to our due diligence processes for onboarding suppliers.

We also conducted a comprehensive evaluation of BINGO's supply chain and the potential risks of modern slavery within our operations.

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**“By working to increase awareness of modern slavery across our business and developing appropriate strategies and plans to combat it, we hope that our customers and sector peers will follow our lead.”**

To better understand areas of risk, our supplier base was segmented, analysed and categorised according to country, industry, product risk, entity risk, and associated spend levels. Following this desktop review, thorough field assessments of our significant international suppliers in China and Vietnam were carried out. Pleasingly, no instances of exploitation were identified during the field audits.

Additionally, this year we updated our Human Rights Statement and our Procurement Policy to include our modern slavery commitments.

We were proud to be recognised for our work addressing modern slavery at the Australasia Supply Management Awards 2020 where we received the award for outstanding supply chain risk management. We will continue to proactively engage with the issue of modern slavery and contribute to combating the practice within our sphere of influence. By working to increase awareness of modern slavery across our business and developing appropriate strategies and plans to combat it, we hope that our customers and sector peers will follow our lead.



Daniel Tartak  
Managing Director & CEO





# WE ARE BINGO

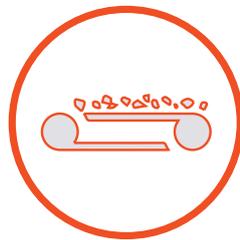
**BINGO is an ASX listed recycling and waste management company with operations across New South Wales and Victoria. BINGO provides end-to-end solutions across the resource management supply chain including collection, processing and recovery, disposal and manufacturing.**



## Collections

BINGO's Collections business is carried out through its two business divisions BINGO Bins and BINGO Commercial. BINGO Bins focuses on the collection of non-putrescible Building and Demolition (B&D) waste from a wide range of construction sites, civil and infrastructure projects and households.

BINGO Commercial focuses on the collection of Commercial and Industrial (C&I) waste from customers across a range of sectors, including commercial office, hospitality, education, retail and manufacturing.



## Post-Collections

BINGO provides Post-Collections services across its network of fully integrated transfer stations, recycling and disposal assets and recycled product manufacturing services.

BINGO diverts waste from landfill by sorting and processing mixed waste to be reused, recycled or sent to other facilities.



## Other

BINGO's remaining business activities include the manufacture and sale of steel and plastic bins through BINGO's wholly-owned subsidiary, TORO Waste Equipment, for both BINGO's Collections operations and for external customers.

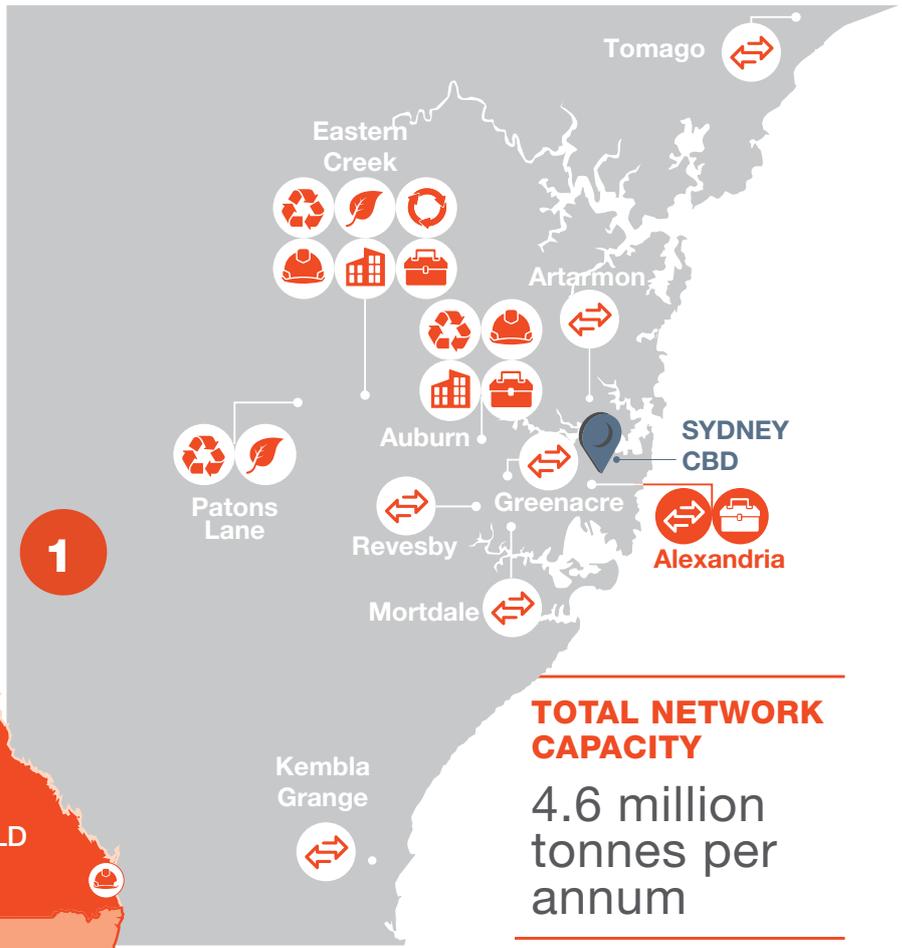
TORO services the waste management, mining and construction industries.



# OUR NETWORK

## New South Wales (NSW) Post-Collections Network

1



## Victoria (VIC) Post-Collections Network

2



- Advanced Recycling
- Transfer and Recycling
- Landfill
- Material Processing
- TORO Manufacturing
- BINGO Office
- Workshop

# MODERN SLAVERY STATEMENT

**BINGO is committed to promoting good labour standards and protecting human rights in our own operations and throughout our supply chains. We are aware that forced labour and human trafficking in the supply chain poses a risk for any business, and we are determined to play our part in making sure that modern slavery is eradicated.**

Within this we are committed to taking the necessary steps and actions that will protect people against modern slavery. We firmly stand alongside the Australian Government's position that there is no place for modern slavery in the Australian community, or in global supply chains. We support the global fight against labour abuse, and we are vocal champions of supply chain transparency.

This Modern Slavery Statement is made pursuant to the **Modern Slavery Act 2018** (Cth). This statement applies to the operations of BINGO, including Bingo Holdings Pty. Ltd, Bingo Property Pty Ltd and Bingo Property (VIC) Pty Ltd, and its subsidiaries for the financial year 1 July 2019 to 30 June 2020 (FY20).

BINGO is committed to maintaining and improving systems and processes to avoid complicity in modern slavery or human rights violations related to our own operations, our supply chain, and our services.

We understand that modern slavery can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking, workplace abuse and human trafficking. In this statement, we use the term "slavery and human trafficking" to encompass all forms of coerced labour.

## OUR SUPPLY CHAIN

BINGO spends almost \$400 million each year across more than 1,500 suppliers. We procure a diverse range of goods and services, each of which may have potential exposure to slavery and human trafficking impacts.

BINGO has undertaken an analysis of the Company's key expenditure categories, and has identified the high-risk products and services procured from countries that pose an elevated modern slavery risk.

1

Proportion of unskilled labour

- Exiobase (Global database indicators)

2

Risk score for Labour Rights and Decent Work, Health and Safety, Human Rights, Governance and Community Infrastructure

- Social Hotspot Database (Global database of indicators)

3

Prevalence and vulnerability country scores

- Global Slavery Index

4

Child rights scores and due diligence response per country

- Child Rights Index

5

Evidence of modern slavery issues cited in literature

- Literature Review

Risk proximity	Products and services	Key issues
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**Direct on-shore and on-site activities**



Construction, repairs and maintenance activities

Labour rights in construction activities including labour hire.



Business-related services and professional services

Labour rights in business-related services and professional services, such as cleaning and security.



Travel and accommodation

Labour rights in the hospitality and travel facilitation sectors.



Vehicles, plant and equipment

Labour rights, health and safety and human rights and governance in the overseas supply chain of parts, equipment and components, and other manufactured goods, including the production of metal products.



**Supply chain**



Building materials

Labour rights, health and safety and human rights and governance in the overseas supply chain of building materials such as cement, hardware, metals and brick.



Business-related services and professional services

Labour rights in offshore/subcontracted corporate services such as financial, travel or marketing sectors and labour rights in food production in Australia and overseas.



IT products and services

Labour rights and health and safety in electronics supply chains.



Marketing and human resources

Labour rights and human rights and governance in the overseas supply chain of merchandise and uniforms including **personal protective equipment**.

Our initial analysis has shown that a large portion of our suppliers are onshore in Australia, however we do have some exposure to international suppliers, particularly in the categories of construction, vehicles, plant and equipment and building materials. We have undertaken steps to understand the first tier of our supply chain, and we continue our work on understanding the geographical risks in our extended supply chain.

BINGO's Procurement Policy provides for risk mitigation and compliance with regulatory requirements, and places a requirement on suppliers to act fairly, ethically and responsibly.

BINGO continues to take a number of steps to address the risks of slavery and human trafficking within our supply chain, as set out following.

# RESPONSIBLE SOURCING PROGRAM AND DUE DILIGENCE

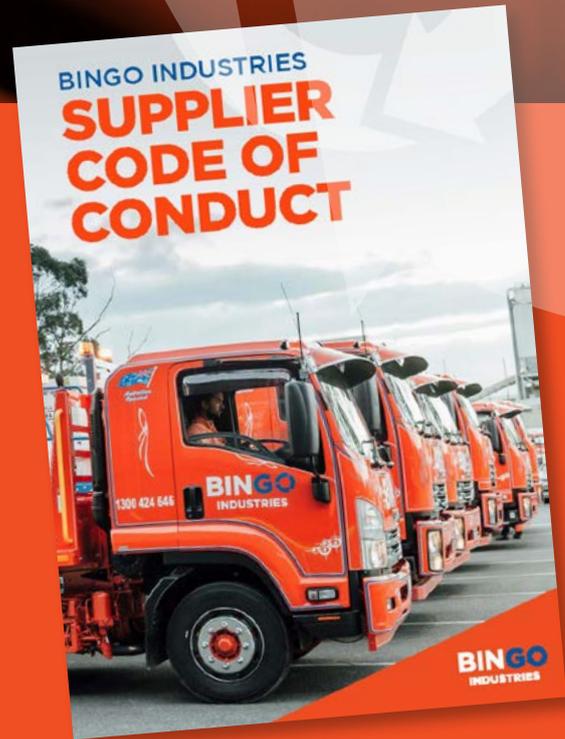
## Responsible Sourcing Program

BINGO's methodology to understand our risk profile in our supplier base utilises five risk information sources to score and assess the likelihood of modern slavery risk for each procurement category. The first four information sources are databases that provide indicators and scores relating to modern slavery risk by sector and country. The fifth source of information is a literature review and provides insight into risks specific to the Australian context and relevant sub-categories of products and services.

The risk analysis used to assess the likelihood of an issue occurring uses market models that trace commodities and services across supply chains. This reflects not only the generic risk of Tier 1 suppliers (sourced in Australia), but also Tier 2 and Tier 3 suppliers that exist upstream of Tier 1 suppliers.

BINGO has developed a Supplier Assurance Program that enables us to identify and address the risks of slavery and human trafficking in our supply chain. Phase one of our Supplier Assurance Program has been completed. This included a review all external spend and a risk assessment of BINGO's incumbent suppliers.

BINGO conducted self-assessment audits of its high-spend, high-risk suppliers using the Slavery and Trafficking Risk Template, an international standard used to assist companies in complying with modern slavery legislation, to improve visibility and transparency into extended supply chains.



## Supplier Code of Conduct

**All suppliers are required to comply with BINGO's Supplier Code of Conduct, and our policies and standards on ethical business practices, safety and environmental management.**

**Suppliers are expected to ensure that all employees and contractors engaged within their business are legally entitled to work, and that no forms of slavery or human trafficking are evident in the delivery of products and services to BINGO.**



## International field assessments

**In FY20, BINGO conducted field assessments on two international suppliers in our high-risk categories. This consisted of a discreet short notice assessment of the suppliers' facilities by a third party. These assessments included a local environment assessment, external observation of the facilities, engagement with local members of the public living and working in close proximity to the facilities; direct engagement with the owner/manager of the facilities and a walk through the facilities.**

**In both assessments, no instances of exploitation were identified and there were no indicators or warnings that would suggest that exploitation has or continues to occur.**

### Remediation

In the event that BINGO becomes aware slavery or human trafficking within our supply chain, BINGO's policy is to remediate issues directly with the supplier. BINGO's first position is to work with suppliers to cease and remediate the activity and work with the supplier as they take the appropriate action to cease the activity. Remediation will be focused on working with our suppliers, however, there may be instances of severity or recalcitrance that may require Australian Federal Police involvement and if these circumstances arise BINGO will uphold its regulatory obligations.

### Raising a concern

We have a mechanism for employees and third parties to anonymously report suspected or actual illegal activities or breaches of policy, as provided for in the Company's Speak Up Policy, Code of Conduct and Supplier Code of Conduct. Under these circumstances BINGO will report any breaches to regulatory authorities.

Employees and third parties are able to communicate any concerns regarding suspected slavery by phone, via our online Speak Up platform, or by email.

Each concern received is investigated and reported to our procurement, internal audit and legal executives. The instances and outcomes of our investigations are reported to the relevant authorities, including the Australian Federal Police, BINGO's Audit and Risk Committee and the Board. We strive to ensure all concerns are investigated and managed in a systematic, fair, timely and transparent manner.

## Effectiveness

Phases one and two of BINGO's Responsible Sourcing roadmap are largely complete, with the roll out of our Supplier Assurance Program. Testing the effectiveness of BINGO's measures to assess and remediate modern slavery will commence in phase three of our Responsible Sourcing roadmap.

Early indications are that our current strategy is robust and provides significantly greater confidence that BINGO is on the right path to identify and eliminate the risk of modern slavery from our extended supply chain.

## Governance and policy framework

The Board and Executive Leadership Team's (ELT) decision making is underpinned by BINGO's core values - the BINGO Way - Be Loyal, Inside the Law, Never Say Never, Greatness is Earned, and One Team, One Family. These values guide the standards and behaviours that are expected of BINGO's Directors, ELT and employees. For more information see BINGO's Corporate Governance Framework.

BINGO is committed to high standards of corporate governance. We promote sustainable business practices through our Corporate Governance Framework. Our Board and Committees provide the direction and leadership to implement appropriate levels of governance across our company so that our decisions and actions are based on transparency, integrity, responsibility and value-creation.

Every BINGO employee is expected to practice the highest ethical standards at all times, and to operate in compliance with all policies and laws that apply to our Company. BINGO has in place a number of policies which assist in protecting the human rights of our employees including providing protection against slavery and human trafficking. These policies include BINGO's:

- **Code of Conduct;**
- **Human Rights Statement;**
- **Procurement Policy;**
- **Supplier Code of Conduct;**
- **Speak Up Policy; and**
- **Responsible Sourcing Program.**

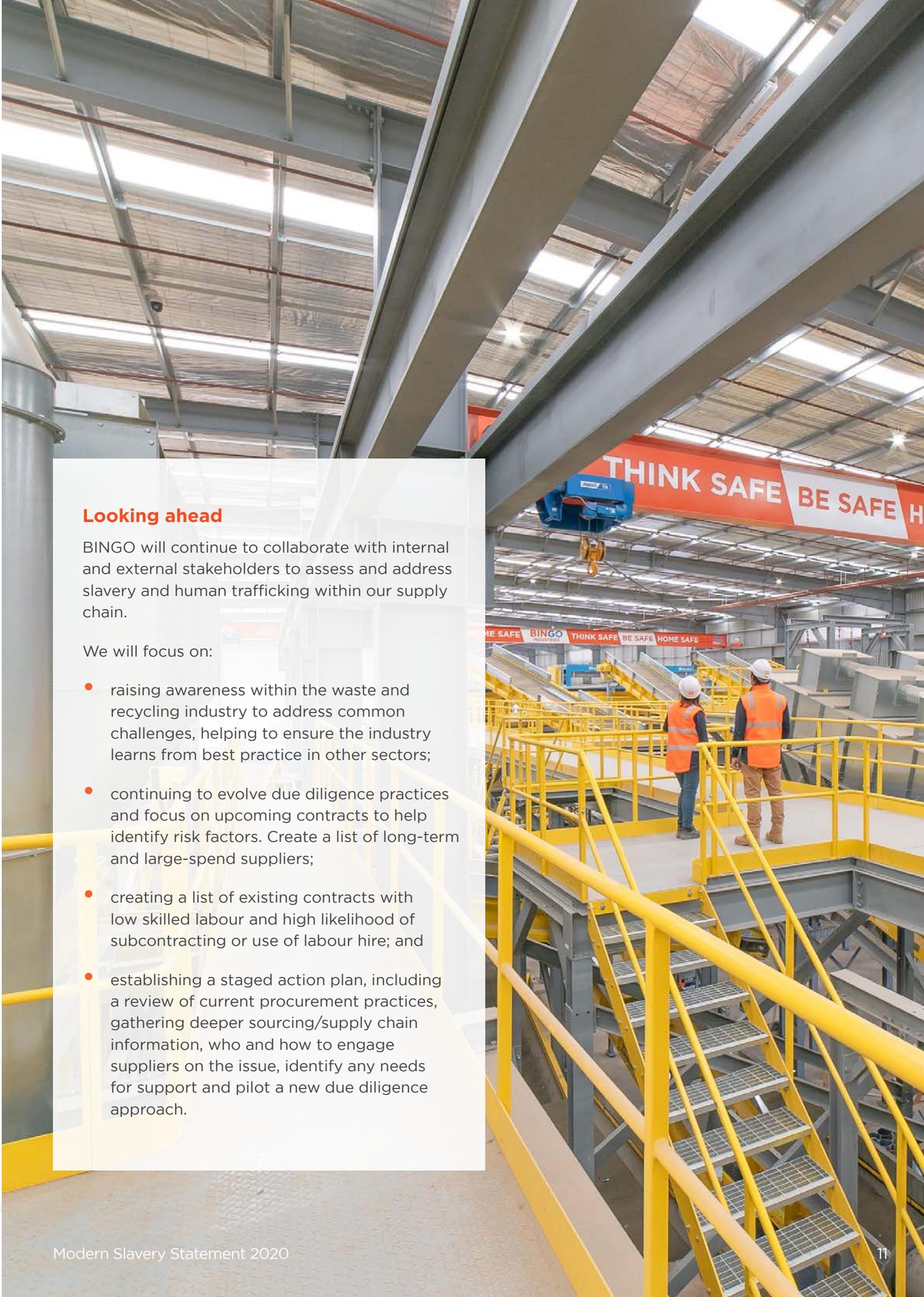
These policies reflect our ethics and values, providing guidance on the way we treat our employees, work with our customers, suppliers and other business partners, and contribute to communities in which we operate.

## Current performance

BINGO has revised and updated all relevant policies and procedures to account for identifying and managing the risks associated with slavery and human trafficking. Our Code of Conduct and Supplier Code of Conduct outlines our corporate values and ethical principles, setting out the behaviours expected of all employees, contractors and suppliers.

We have also revised all procurement documentation to clearly articulate our position, and where relevant, to provide suppliers with the opportunity to provide information on their policies and procedures related to reducing the risk of slavery and human trafficking in their supply chains.

BINGO has mandated Modern Slavery Awareness training from 2020 for all staff that procure on behalf of BINGO. This training includes: an overview of modern slavery, the different forms it can take, how to recognise the signs in a workplace, the background to the Australian Modern Slavery Act 2018 (Cth), how this may impact our supply chain, and what employees can do if they suspect any incidents of slavery or human trafficking.



## Looking ahead

BINGO will continue to collaborate with internal and external stakeholders to assess and address slavery and human trafficking within our supply chain.

We will focus on:

- raising awareness within the waste and recycling industry to address common challenges, helping to ensure the industry learns from best practice in other sectors;
- continuing to evolve due diligence practices and focus on upcoming contracts to help identify risk factors. Create a list of long-term and large-spend suppliers;
- creating a list of existing contracts with low skilled labour and high likelihood of subcontracting or use of labour hire; and
- establishing a staged action plan, including a review of current procurement practices, gathering deeper sourcing/supply chain information, who and how to engage suppliers on the issue, identify any needs for support and pilot a new due diligence approach.



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