

*This Modern Slavery Statement covers the activities of Tomra Cleanaway Pty Ltd (“Tomra Cleanaway”), during our financial year ended 30 June 2022 (“FY22”). It sets out the actions Tomra Cleanaway has taken to identify and mitigate any potential **modern slavery risks** in Tomra Cleanaway’s operations and supply chain in the twelve months ended on 30 June 2022.*

1 – Introduction

Tomra Cleanaway is a joint venture between Cleanaway Pty Ltd (**Cleanaway**) and TOMRA Europe AS (**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 610 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 second Modern Slavery Statement, which we have prepared in relation to FY22 (“**FY22 Modern Slavery Statement**”).

Tomra Cleanaway is aware of the consultation requirements of the Modern Slavery Act. However, Tomra Cleanaway does not control or own any other entities, nor does it form part of any other corporate group and therefore this Modern Slavery Statement relates solely to the operations of Tomra Cleanaway.

2 – What is modern slavery?

In this FY22 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 610 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 services, post collection services by sorting collected material and facilitates the sale 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 FY22 Modern Slavery Statement below) conducted during FY22:

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.
Collection point partners	There are a large number of small businesses and charities which participate in the network of collection points.

6 – Our approach: risk assessment and mitigation

6.1 – Overview

In preparation for compliance with the Modern Slavery Act (including publication of this FY22 Modern Slavery Statement), during FY22, 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 FY22 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 & 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	<p>That there are modern slavery risks in the operations and/or supply chains of Tomra Cleanaway’s various contractors and suppliers:</p> <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); • 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 low overall modern slavery risk, given that Tomra Cleanaway’s various partners comprise a significant number of small businesses and community organisations which are physically located in NSW, Australia.

6.3– Actions: mitigation of potential modern slavery risks

During FY22, 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
Human resources	Lack of awareness	<p>In FY22, Tomra Cleanaway participated in initiatives for raising awareness of modern slavery, including mandatory training of all white-collar employees. The training was focused on educating Tomra Cleanaway staff about the requirements of the Modern Slavery Act, how to better identify modern slavery risks and the processes for reporting any concerns identified, including through Tomra Cleanaway’s third-party service FairCall and Tomra Cleanaway’s Whistleblower Policy.</p> <p>In addition, all new staff are required to complete modern slavery training as part of their onboarding process</p>
Operations & Supply chain	Workforce risks	<p>During FY22, 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

Area of business	Modern slavery risk	Action(s) taken to mitigate modern slavery risk
		<p>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</p> <ul style="list-style-type: none"> • Collection Point Operators - Tomra Cleanaway issued information to collection point operators to address the identification and mitigation of new modern slavery risks which arise in small businesses.
Supply chain	Supply chain risks	<p>During FY22, 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 Business Principles for Suppliers & Partners attached. This is further supported by TOMRA’s Code of Conduct (Section 3.3) dealing with Human Rights. 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 (FY22) attached.

6.4 – Effectiveness of Actions

As at the date of this FY22 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 FY22 to mitigate the potential **modern slavery risks** which were identified as part of the Risk Assessment.

7 – Our plans for FY23

During FY23, we plan to:

1. Continue mandatory modern slavery training for new employees and all white-collar employees
2. Promote access to third party FairCall in terms of Tomra Cleanaway’s Whistleblower Policy for all employees to encourage the reporting of modern slavery risks.
3. Provide specific training to account managers dealing with Collection Point Partners and incorporate observations on **modern slavery risk** into regular site assessment evaluations.
4. Monitor and review to identify and mitigate 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.
5. Continue to strengthen awareness of **modern slavery risks** in our network of collection points to address the identification and mitigation of new **modern slavery risks** which arise.



Markus Fraval

Director

29 December 2022

This FY22 Modern Slavery Statement has been approved by the Board of Directors of Tomra Cleanaway Pty Ltd.

Annexure A: Cleanaway FY22 Modern Slavery Statement

Annexure B: TOMRA Corporate Responsibility Statement

Annexure C: TOMRA Systems Business Principles for Suppliers & Partners