

NodernSlaveryStatementFY20

NTS REAT

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Modern Slavery Statement FY20

This Modern Slavery Statement ("MMS") relates to the reporting period of 1 July 2019 to 30 June 2020 and made pursuant to the Modern Slavery Act 2018 (Cth) by J.J. Richards & Sons Pty Ltd (ACN 000 805 425) ("JJR") in respect of JJR and its wholly owned and controlled subsidiary entities ("together referred to as we, us, our, the JJR Group").

I.Richards & Sons Pty

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Our Structure, Business & Supply Chains

Structure



Our Modern Slavery Risks

We have conducted a detailed risk assessment and evaluation to identify the risks of modern slavery in our overarching operations and supply chains. This was completed having regard and giving due consideration to the principles around same provided in the relevant guidance material.

The below categories of suppliers and subcontractors who provide products or conduct services for, or on behalf of the JJR Group were identified during this process as those who may be at a higher risk of modern slavery occurring in their supply chain:

- Companies (non-trade qualified) undertaking building maintenance on our sites – e.g. office cleaning, garden/yard maintenance;
- Companies (trade qualified) undertaking building maintenance on the JJR Group's sites – e.g. including electricians, plumbers, carpenters, roofers;
- Cleaning and detailing (non-trade qualified) of JJR vehicles – companies and/or professionals undertaking cleaning and detailing services of JJR vehicles;
- Information Technology (I.T.) services; and
- Labour Hire services.

How we address these risks

The JJR Group takes a zero-tolerance approach to modern slavery and the risks assoc The JJR Group acknowledges the importance of providing practical steps to underpin o compliance by implementing various measures to continue addressing the risks of mod our operations, supply chains, and actions associated with same.

We are dedicated to providing an environment which enables us to monitor, manage an modern slavery in a way which ensures accountability and transparency across our enti structure. As such, the JJR Group has implemented a multi-faceted approach to manag of modern slavery in our operations including:

- A Whistle-blower Policy which can be used by internal and external stakeholders;
- Employment and Industrial Relations Policy;
- A due diligence program in relation to engaging with suppliers wherein high-risk supp required to attest to having adequate protocols in place to respond to the risks of Moo Slavery; and
- Training and instruction of and to relevant staff.

Assessing the effectiveness of our actions

Overall, we are continually monitoring our risk profile and ensuring the JJR Group have appropriate controls in place to ensure compliance with the Act – which we consider to be imperative in upholding our Company Values which define the way we do things and the way we treat others. We assess the effectiveness of these actions through:

- **a.** The establishment of a regular review process that involves sourcing, our People department and Legal team;
- b. Considering any trends in cases reported through grievance mechanisms; and
- c. Regularly checking our risk assessment processes to ensure that they remain up-to date.

How did we consult on this statement?

Our associated entities for the most part share Company Officers and have the same corporate system and advisory staff. This statement has been approved by the Board of Directors of J.J. Richards & Sons Pty Ltd on 23 February 2021.

N.C.

John Richards CEO - J.J. Richards & Sons Pty Ltd.



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