Modern Slavery Statement for 2021

SUEZ opposes slavery in all its forms and has zero-tolerance towards this matter.

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Modern Slavery Statement for the year ending 31 December 2021

About this statement

SUEZ opposes slavery in all its forms. This statement has been prepared to meet the requirements of the *Australian Modern Slavery Act 2018 (Cth)* and constitutes SUEZ's Modern Slavery Statement for the calendar year ending 31 December 2021.

It is submitted as a joint statement on behalf of the SUEZ reporting entities listed in the statement. The statement outlines the actions of SUEZ to identify, assess and address the risks of modern slavery practices across our operations and supply chains.

This is our second statement issued under the Act.

All references to "our", "we", "us", "the company" and "SUEZ" refer to SUEZ Australia Holding Pty Ltd (ABN 30 070452 890) and its subsidiaries, unless otherwise stated. All references to a year are the calendar year ended 31 December 2021, unless otherwise stated.

This statement was approved by the board of directors of each of the reporting entities covered by it. It is signed by the Managing Director and CEO of SUEZ Australia Holding Pty Ltd at the time of the close of the reporting period, being the Australian parent company and highest entity in the SUEZ Group in Australia at that time.

Please note that Veolia acquired the Recycling and Recovery (R&R) operations of SUEZ in Australia and that from 19 January 2022, these activities are now owned and operated by Veolia. This statement was approved by SUEZ's Executive Committee in its capacity as principal governing body on 31 December 2021 on behalf of all 'reporting entities' as detailed in the "Reporting Entity" section of this statement. It is signed by Mark Venhoek, the current CEO of Veolia China, given that as at 31 December 2021, he was the CEO of SUEZ Australia and had the authority to sign on behalf of SUEZ in Australia for the relevant reporting period.

Mark Venhoek Chief Executive Officer Veolia China

29 June 2022

Acknowledgement of Country

SUEZ acknowledges Aboriginal and Torres Strait Islander Peoples as the Traditional Custodians of this place we now call Australia. We recognise and respect their ongoing cultural and spiritual connection to the land and waters and their sustainable contribution to our natural capital's preservation. We pay respect to Elders, past, present and future.



1. OUR VISION

Modern slavery is a worldwide and growing issue, particularly given the rapid rise in global migration. SUEZ recognises the need to adopt a collaborative approach to tackle the complexity of slavery and human trafficking practices. An important component of our approach is our continuous respect for human rights.

SUEZ is committed to operating responsibly and maintaining high ethical and social standards. We reject any activities which may cause or contribute to modern slavery, including forced or bonded labour, child labour, human trafficking, slavery, servitude, forced marriage or deceptive recruiting for labour or services.

Our commitment to upholding human rights – including opposition to modern slavery – is an inherent part of the value of respect, which is one of SUEZ's four core values (together with passion for the environment, customer first and team spirit). These values underpin the way we interact and work together with our colleagues, customers, clients, partners and the wider community.

In addition, SUEZ is committed to the United Nations' Sustainable Development Goals (SDGs). Our modern slavery strategic action plan is an important part of SUEZ's contribution to **SDG 8** and in particular **Target 8.7**: *Take immediate and effective measures to eradicate*

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.



forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

For all the reasons above, we are committed to taking actions to reduce the risk of modern slavery in our business and supply chain.





2. GOVERNANCE

The SUEZ Australia leadership team comprises ten executive members including the SUEZ Australia Chief Executive Officer (CEO). The team is responsible for the oversight of all sustainability issues.

The SUEZ Australia CEO and leadership team are responsible for managing the Recycling and Recovery (R&R) business unit and the Water business unit of the SUEZ Group in Australia.

Another global business unit of the SUEZ Group, SUEZ Water Technology & Solutions (WTS), is operated outside of the SUEZ Australia Holding Pty Ltd group and is under separate management.

SUEZ Australia operates with a centrally managed group structure. The day-to-day implementation and coordination of our sustainability strategy is undertaken by our sustainability team in close collaboration with other areas of the business, including our legal team, human resources team and procurement team.

Our modern slavery cross-functional working group includes representatives from the sustainability, procurement, legal and human resources teams. The purpose of the working group is to design, recommend and implement SUEZ's action plan on modern slavery. SUEZ's Chief Legal Officer is appointed as the sponsor of this group. The team provides updates to the SUEZ leadership team.

2.1. Relevant policies and procedures

SUEZ employees are expected to always practice the highest ethical standards and to operate in compliance with all policies and laws that apply to SUEZ.

SUEZ has in place several policies which assist in protecting the human rights of our employees and within our suppliers' operations. These Ethics-related policies and procedures include:

- Company Code of Conduct
- Ethics in Supplier Relations
- Ethics Charter and Ethics in Practice Guide
- Ethics in Commercial Relations
- Whistleblowing Policy.

The above Ethics-related policies are further supported by our HR policies such as:

- Indigenous Australian Employment Policy
- Equal Employment Opportunities, Discrimination, Harassment & Bullying Policy
- Grievance Procedure
- Inclusion Policy
- Flexible Work Policy.

2.2. Reporting and remediation processes

SUEZ provides a number of mechanisms for employees, contractors and third parties to raise grievances.

The SUEZ Whistleblower Policy and Whistleblowing User Guide set out the process for employees and others to make confidential reports without fear of retaliation. Grievances reported under this policy are reviewed by SUEZ ethics officer who, in appropriate cases, either conducts or commissions an investigation to understand the issue and ensure appropriate action is taken.

The employee assistance program is also promoted to staff as a support program for advice and assistance when needed. It provides an external and confidential support service by telephone through which advice and information are imparted to employees across a wide range of topics.



SUEZ will consider the impact on any person working for the company or on its behalf who believes they are a victim of slavery, human trafficking or forced labour. Furthermore, the company aims to support any such person, including assisting that person in reporting the concern to the appropriate authorities.

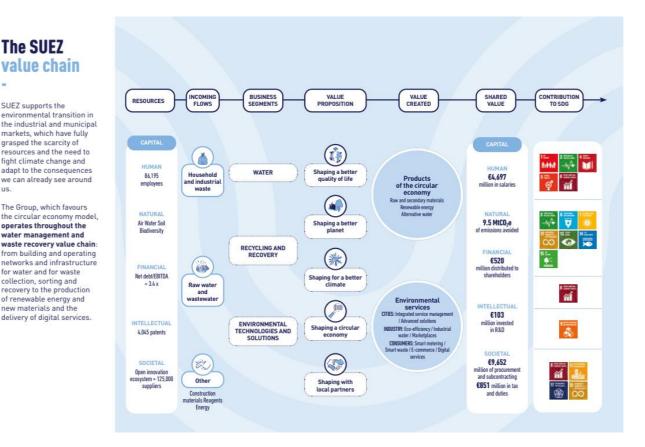
3. **ABOUT SUEZ – OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN**

3.1. Who we are

SUEZ Group provides smart and reliable solutions for towns and cities, businesses and industry that promote the efficient use of resources including:

- Water: management and optimisation of water networks and infrastructure
- Water Treatment Solutions: production of drinking water, seawater desalination, sludge treatment, wastewater purification and recycling
- Recycling & Recovery: collection, recovery and recycling of waste materials into valuable new . resources and energy
- Oil & Gas Systems: design and manufacture of specialised process equipment for the oil, gas and energy industry
- Consulting: technical, economic and environmental consulting services for the sustainable design of . cities and use of land.

The SUEZ value chain, which ultimately links up to 'Contribution to Sustainable Development Goals (SDG)' is set out below.



SUEZ is listed on the Euronext exchanges in Paris and Brussels.



us.

SUEZ Australia is the Australian subsidiary of the SUEZ Group, a global organisation headquartered in Paris, France with over 86,000 employees worldwide. The Group has delivered waste collection, recycling and water services since the late 19th century and invests approximately €120 million per year in research, development and innovation. SUEZ supplies 92 million people with drinking water and 65 million people with sanitation services. SUEZ provides nearly 52 million people with waste collection services and recovers more than 14 million tonnes of waste to create secondary raw materials and energy.

In Australia, we have over 2,600 employees at around 100 sites offering customer-focussed and technologically advanced solutions to meet the water and waste management needs of millions of people. Our resource management solutions are at the leading edge in the provision of drinking water, desalination, wastewater treatment and re-use, biosolids management, smart water networks, oil and gas systems, waste collection, resource recovery and recycling and the processing and recovery of organics.



At SUEZ, we invest in preserving and restoring the natural capital and in the future of biodiversity, both on land and at sea. To address the challenges and opportunities of the next decade with respect to climate change, demographic growth and changing lifestyles, we are implementing Shaping SUEZ 2030, a strategic plan which aims to increase the organisation's positive contribution to creating value in a changing world.

Everyone at SUEZ played a part in helping to create a sustainable future. Together, we are also committed to investing in partnerships with community-based organisations that strive for sustainable change as well.

Sustainability is not just about looking after our natural environment. It is about the relationship between economy, society and the environment; the equal distribution of resources and opportunities; and living within our means.

SUEZ Australia supports local community organisations through yearly grants, sponsorships, in-kind services and employee volunteering.

3.2. Our structure and operations

The Recycling & Recovery (R&R) business unit is SUEZ's largest business unit in Australia. It primarily focuses on the collection and processing of both commercial and industrial (C&I) and residential waste. The division includes the operation of the southern hemisphere's largest residential waste collection contract. Our Water business unit is concerned with the treatment and reuse of water. Our WTS division is separately managed and provides specialist equipment and comprehensive solutions to meet the needs of a variety of industries, including food and beverage, chemicals, pharma, and mining.

3.2.1. Our waste recycling and recovery business

SUEZ offers a broad portfolio of recycling and recovery solutions that support our customers in transforming waste into new resources, meeting regulatory obligations and contributing to a circular economy.

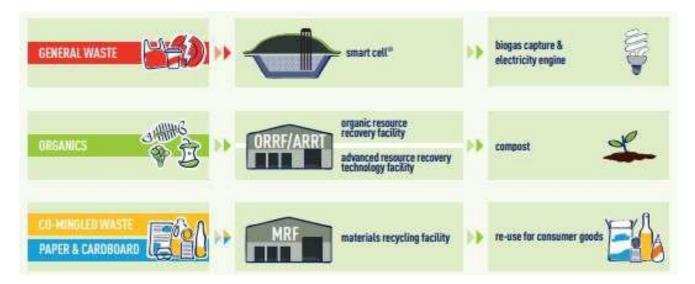
Each week, we recycle and recover thousands of tonnes of valuable resources from commercial and industrial businesses, residents and municipal councils back into the economy. We sort and separate recyclables at our **materials recycling facilities** (MRF) which are then remanufactured into new products.



We also divert up to 55% of general waste from landfill by turning household and commercial waste into **compost** at our advanced resource recovery technology (ARRT) facilities. Our organic resource recovery (ORRF) facilities convert **green organic waste** into a range of composts, mulches, and soil blends, creating specialist products for use across a variety of applications including home gardens, sporting fields and public parks.

SUEZ was the first company in Australia to convert commercial, industrial, construction and demolition waste into an **alternative fuel**. At present, we are overseeing the development of three **energy from waste** facilities in Australia that are at various stages of the project lifecycle. These facilities will provide a viable alternative to landfill, by producing electricity and steam from waste.

When waste cannot be recycled or reused, we see to its safe and secure disposal at one of our **engineered landfills**, some of which employ Smart Cells[®]. A sophisticated, highly engineered alternative to traditional landfill, the cells generate biogas from waste which is converted into renewable energy used to power homes and businesses across Australia.



3.2.2. Our Water services business

Ensuring that clean and safe **drinking water** makes it to households and businesses across Australia is no simple task. Our diverse technological expertise means we have the capacity to build and service high performance water treatment facilities.

SUEZ operates the Prospect **Water Filtration** Plant in Sydney's west that has been providing Australia's largest city with 85% of its drinking water for over two decades. With our partners, we operate two **desalination plants** in Australia delivering thousands of supplementary cubic metres of drinking water to residents per day.

Water is a reusable resource and we offer our clients proven solutions that enable **wastewater** to be treated and re-used. Through various 'sludge' treatment methods, SUEZ assists our customers in reducing, eliminating, or recycling **biosolids**.

SUEZ provides complete water network management services for water authorities and communities. Our investment in our **smart network** means we can not only provide remote water reading for our customer but also identify leaks across the network in real time.



3.2.3. Our facilities

SUEZ Recycling & Recovery and Water facilities map



3.3. Our supply chain

In the 12 months ending 31 December 2021, SUEZ spent more than AUD700 million with more than 3,950 suppliers and subcontractors across our operations. The table below shows the percentage of our top spend by category.

Top Spend by Category	Percentage
Subcontractors	21.07%
Disposal	23.87%
Fleet & fuels	15.97%
Professional services (incl. facilities management)	7.26%
Labour Hire & recruitment	7.37%

Our supply chain is extensive and varies depending on which business division we are supporting. For example, in the R&R business unit, the waste collections and logistics division have the largest expenditures in the fleet, fuel, labour hire and subcontractor categories. By contrast, the purchase of chemicals and equipment such as membranes for desalination plants accounts for the bulk of our Water business unit's expenditure.



4. **REPORTING ENTITIES**

This statement is submitted as a joint statement on behalf of the following reporting entities:

Name of reporting entity	Australian Business Number
SUEZ Australia Holding Pty Ltd	30 070 452 890
SUEZ Recycling & Recovery Holdings Pty Limited	18 002 658 255
SUEZ Recycling & Recovery Pty Ltd	70 002 902 650
SUEZ Recycling & Recovery (NSW) Pty Limited	93 524 709 106
SUEZ Water Pty Ltd	33 051 950 068

5. ASSESSING THE POTENTIAL RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAIN

5.1. Group Risks and Opportunities within the Sustainable Development Goals (SDG)

Based on SUEZ Group's analysis of risks and opportunities aligned with SDGs, one of the key risks identified under Health and Citizen's concerns relates to Supply Chain Vigilance (SDG 16 and 17).



5.2. Risk mapping

SUEZ has a broad operational footprint across Australia and collaborates with a diverse range of suppliers and partners, from small family-run businesses to large corporate organisations. We recognise that all products and services carry a risk of modern slavery in their supply chains. We are committed to better understanding the risks



of modern slavery for our operations and supply chains and have developed a risk-based approach to the due diligence.

Within the SUEZ Group, a global risk mapping exercise was undertaken in 2018 to identify geographies and products and services that carry a higher level of human rights risk as part of the duty of vigilance law in France. SUEZ in Australia was part of this global risk evaluation exercise which involved an analysis by purchasing category and by country. The combination of these two factors enabled a risk categorisation to be formed which was then applied to modern slavery evaluation in Australia.

The geographic risk was established based on the Global Slavery Index 2018 which highlights how some countries have a higher prevalence of modern slavery. This is often associated with poor governance, weak rule of law, conflict, migration flows and socioeconomic factors such as poverty.

5.3. Results of the risk mapping

Our initial analysis has shown that the vast majority of SUEZ Australia's R&R suppliers are onshore Australian based 5,613 suppliers (98.42%). Regarding the remaining 90 R&R suppliers (1.58%), which we source from international markets, the key product categories are plant and equipment, Asia, Europe, and the USA. The Water business sourced key product categories such as membranes from Europe and the USA.

An analysis of the key expenditure categories has identified the following products and services categories, as in the past, that pose an elevated modern slavery risk:

Category of product/service	Area of business	
Labour hire	HR/Procurement/Operations	
Plant & equipment; fleet supplies	Procurement /Operations	
PPE/uniform supplies	Procurement	
Service providers (i.e. cleaning services)	Operations	
Office supplies & consumables	Procurement	

6. ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISKS

The key steps that SUEZ has taken during 2021 are set out below.

6.1. Ethics - an essential element

SUEZ Group has made ethics an essential element in improving its global performance. Compliance with ethics values is vital in all the Group's activities - in our dealings with our clients, suppliers and other stakeholders, as well as in our internal company relations. The Group has put in place an ethics procedure based on:

- Key policies and reference documents
- Procedures
- Regular training
- Reporting

The Corporate General Secretary oversees the Group Ethics & Compliance function and is the Group Ethics Officer. The Group has a network of Ethics Officers, in various SUEZ entities and subsidiaries across the global group.

Ethics Officers assist the Group Ethics function. Their role is to:

• Ensure that an adequate ethics mechanism is in place and that personnel are sufficiently familiar with it



- Assess ethics-related risks within the entity and put in place measures
- Report to the Group Ethics Officer,
- Make contributions to the Group Ethics Officer network.

Ethics Officers provide an Annual Ethics Report to the Group Ethics Officer. They also report significant ethicsrelated incidents to the Group Ethics Officer.

6.2. Role of Procurement

SUEZ Australia requires its business partners, suppliers, and sub-contractors to implement practices that are compatible with its ethical, environmental, and social commitments. All principles and rules applicable for managing purchases and suppliers now form the SUEZ Procurement Policy.

The Procurement Department oversees the coordination of relationships and negotiations with strategic suppliers. SUEZ's long-term plan is to ensure sustainable strategies (particularly supplier contracts or partnerships), technical innovations and continuous improvement plans. This is complemented by detailed procedures designed to support each State and Corporate Department to reach their objectives in terms of procurement economic performance & process compliance.

It is important to note that SUEZ also receives requests from clients regarding Modern Slavery surveys and questionnaires. SUEZ responds to such requests in the true spirit of compliance.

6.3. Supply chain mapping

During 2020, we gathered information from our database of suppliers to better understand our supplier population. We then selected a sample of our suppliers based on risk criteria that included the type of services or goods provided to SUEZ and the country of origin. We believe that the benefits of this exercise flow into 2021 and key matters continue to be addressed by the business.

6.4. Due diligence self-assessment questionnaire

We developed and launched a self-assessment questionnaire in 2020 and this forms an important ongoing component of our process to identify and assess risks within our higher risk suppliers. There were 650 tier one suppliers (in the first layer of the supply chain) selected in total who were engaged through the questionnaire.

The questionnaire asks suppliers to provide information on how they identify and address the risks of modern slavery in their own operations and the operations of their suppliers. The results will inform future actions to take, including identifying those suppliers where additional assistance or monitoring may be required. The analysis of the responses gathered in 2020 are part of the 2021 priority actions.

Following key business decisions taken during 2020 & 2021, SUEZ underwent a major internal restructuring program and was also partly affected by Covid-19 restrictions. Due to these reasons, whilst another supply chain mapping was not undertaken during 2021, reliance was placed on the 2020 results with ongoing focus on the actions arising therefrom.

6.5. Modern slavery clause incorporated in supply contract terms

Based on a review of our purchasing standard terms and conditions, a specific modern slavery clause was inserted, requiring continued compliance by suppliers with modern slavery laws. The clause also requires suppliers to take reasonable steps to ensure there is no modern slavery within their operations and supply chains. Further, it entitles SUEZ to audit the suppliers for modern slavery compliance.



Modern Slavery clause for suppliers

39.	MODERN SLAVERY LAWS	
39.1	In performing its obligations under with this Agreement,	
	the Contractor will, and will ensure that its Personnel:	and a second and
	(a) comply with all Modern Slavery Laws; and	A State of the second s
	(b) take reasonable steps to ensure that there is no Modern Slavery	and the second second
	in the Contractor's or its Personnel's supply chains or in any part	and the second second
	of their businesses.	
39.2	The Contractor represents and warrants that neither it nor	
	its Personnel:	
	 have been convicted of any offence involving Modern Slavery; and 	
	(b) to the best of their knowledge, having made reasonable enquiries, have been or are the subject of any investigation, inquiry or enforcement proceedings by any Government Agency regarding any offence or alleged offence of, or in connection with Modern Slavery;	
39.3	The Contractor will comply (and ensure that all of its Personnel	
	comply) with any reasonable requests made by SUEZ for the	
	provision of information or documents as required by SUEZ to enable	
	SUEZ:	The second second
	 (a) itself to comply with Modern Slavery Laws; and/or 	
	 (b) to assess the Contractor's own compliance with Modern 	
	Slavery Laws.	and the second second
39.4	The Contractor will immediately give written notice to SUEZ if it	
	becomes aware of a possible, potential, suspected or actual breach by	
	it or its Personnel of any Modern Slavery Law.	

Suppliers of goods and services to SUEZ must continue to comply with all relevant legislation and international standards as relevant to their industry, including child and forced labour, health and safety of workers, non-discrimination, employment law, human rights, fraud, bribery, and corruption. We expect that our suppliers will hold their own suppliers to the same high standards to which we hold them.

6.6. Engagement with NGOs – Slave-Free Alliance (Hope for Justice) and Anti-Slavery Australia

In the past, SUEZ engaged with **Slave-Free Alliance**, a social enterprise established by **Hope for Justice** to help businesses and organisation manage the threat of modern slavery within their supply chains. Hope for Justice is one of the world's leading anti-human-trafficking charities, operating across five continents. Members of SUEZ's modern slavery working group were given a presentation by Slave-Free Alliance which explained the extent and complexity of modern slavery with a focus on the Australian context and highlighted the new challenges posed by the covid-19 pandemic. SUEZ also engaged with **Anti-Slavery Australia**, a specialist legal practice, research and policy centre committed to the abolition of modern slavery in Australia. We explored the opportunity for the organisation to present a modern slavery face-to-face training session and webinar for relevant employees.

The benefits of this engagement with the NGOs flowed into 2021. For details regarding in-house webinars held in 2021 on Modern Slavery see item '6.7 Training' below.

6.7. Training

Dr Jennifer Burn from **Anti-Slavery Australia**, a specialist legal practice, research and policy centre delivered the first Modern Slavery workshop at SUEZ on the 26th of February 2021. Thereafter, Jacqualine Raad, SUEZ Learning & Development Consultant, delivered two more sessions on the 17th of June and on the 3rd of September 2021. In total 78 Managers from various state offices representing the R&R and Water businesses, as well as from Corporate Office attended this training. Participants represented various departments/functions such as Business Development, Sales, Operations, Compliance, IT, Finance, Procurement, HR, Tenders and Legal. Topics covered include a detailed introduction to modern slavery, modern slavery risks and reporting requirements and dealing with modern slavery at SUEZ Australia.

In the past, the modern slavery working group delivered an awareness training session to the SUEZ leadership



team during 2020. This session included the topics of what is modern slavery; relevant facts and figures; modern slavery and the Sustainable Development Goals; the international context; the Australian context; how modern slavery relates to Australian companies; the Modern Slavery Act 2018 and its requirements; and the actions being undertaken by SUEZ. SUEZ also provided training in ethics policies more broadly. Employees are expected to review and comply with our policies, including the Ethics Charter, Ethics in Practice and Ethics in Supplier Relations.

SUEZ is committed to continue to deliver training to employees to build awareness, identify any signs of modern slavery and put an end to it.

7. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We recognise the value and importance of continual improvement and assessing the effectiveness of the actions taken to address modern slavery risks.

As at the date of this 2021 Modern Slavery Statement, we have not identified any incidents of modern slavery within our operations or our supply chains.

We use key performance indicators (KPIs) to measure how effective we have been to ensure that slavery is not taking place in any part of our business or supply chains. In 2020, our KPIs were:

- Number of risk assessments conducted during the year: 650 tier one suppliers contacted in 2020. The results and benefits from this risk assessment continued to flow into 2021.
- Training provider selected: Between Feb to Sept 2021, in-house webinar training on Modern Slavery provided to 78 Managers from various state offices representing the R&R and Water businesses, as well as from Corporate Office.

Note that Veolia has acquired the Recycling and Recovery (R&R) operations of SUEZ in Australia and from January 19th, 2022, these activities are operated by Veolia. Additional KPIs identified for 2022 will oversee our evaluation process:

- Number of employees who have received training during the year.
- Number of risk assessments conducted during the year.
- Number of cases discovered within SUEZ operations or in our supply chain (if any).

The ongoing message to the business is clear - SUEZ opposes slavery in all its forms and has zero-tolerance towards this matter.

8. LOOKING AHEAD – KEY FOCUS AREAS IN 2022

SUEZ is committed to continuing to improve our approach to respecting human rights and preventing modern slavery. We will continue to do this by:

- Reviewing and, where appropriate, improving due diligence processes.
- Risk assessing suppliers based on responses to due diligence questionnaires.
- Delivering training for employees in procurement, legal, human resources and other relevant business functions through external agencies and/or our internal learning & development team.

It is worthwhile noting that Veolia has acquired the Recycling and Recovery (R&R) operations of SUEZ in Australia and that from January 19th, 2022, these activities are operated by Veolia that is strongly committed to continuing to improve our approach to respecting human rights and preventing modern slavery.

Veolia is convinced a continuous improvement approach to tackle modern slavery is necessary. Following the acquisition, in early 2022, of Suez Australia Holdings Pty Ltd, Veolia will focus on aligning Veolia and Suez respective Modern Slavery frameworks, retaining and reinforcing proven actions already in place, and implementing new actions as appropriate.



SUEZ opposes slavery in all its forms and has zero-tolerance towards this matter.