



MODERN SLAVERY STATEMENT 2021

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INGO

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.

BINGO

A MESSAGE FROM BINGO CEO CHRIS JEFFREY

I am pleased to present BINGO's second Modern Slavery Statement.

Working to eliminate modern slavery in Australia and throughout international supply chains is everyone's responsibility. This statement sets out how BINGO is working to implement best-practice sustainable supply chain management, ensuring that all our procurement activities oppose modern slavery.

BINGO spends almost \$500 million annually across more than 2,000 suppliers. A large proportion of these suppliers are small-to-medium size enterprises (SMEs).

Over the last year BINGO has continued to improve our Responsible Sourcing Program, a key component of which is addressing modern slavery risk within our supply chain. This program also incorporates human and labour rights governance, climate change action and carbon reduction, as well as general supply chain governance.

During 2021 we did not detect any instances of Modern Slavery in our operations or in the high risk areas scanned in our supply chain. We continue to work through our action plan to implement a functional program. This year we began aligning our procurement processes and Responsible Sourcing Program to international standard ISO 20400, Sustainable Procurement. In FY21, we undertook a comprehensive evaluation of our supply chain and in FY22 we have continued to embed our international best practice due diligence processes.

We introduced a new due diligence framework that provides additional compliance requirements for high-risk categories and suppliers, while taking into consideration the resourcing and awareness limitations of our SME suppliers.

By working to increase awareness of modern slavery across our business and with our SME supplier network, and by developing best-in-class strategies and plans to address areas of concern, we strive to encourage positive change within our industry.

Chris Jeffrey Chief Executive Officer

"By working to increase awareness of modern slavery across our business and with our SME supplier network, and by developing best-in-class strategies and plans to address areas of concern, we strive to encourage positive change within our industry."





WE ARE BINGO

BINGO is a recycling and waste management company with operations across NSW and VIC. BINGO provides end-to-end solutions across the resource management supply chain including collection, processing and recovery, disposal and recycled product and bin 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.

BINGO manufactures a range of recycled landscape and building products as part of its ECO Product range of aggregate, road base and mulch.



SUBSIDIARIES AND JOINT VENTURES

TORO WASTE EQUIPMENT

BINGO's other 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.

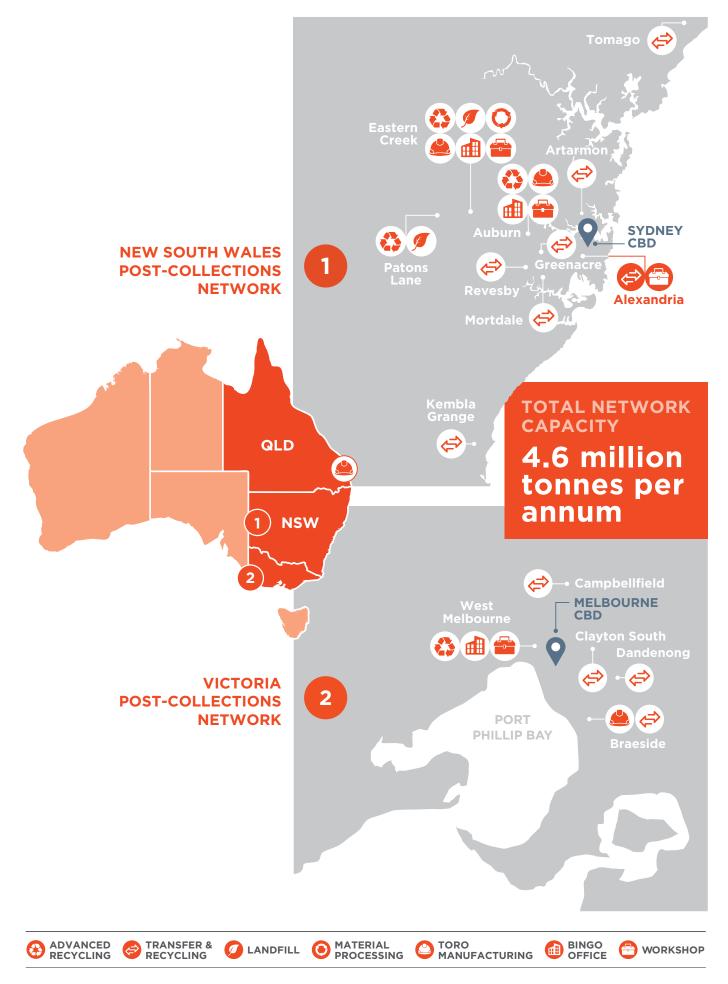
TORO services the waste management, mining and construction industries.

DJURWA

BINGO is a minority partner in the Indigenous recycling and waste management company, Djurwa. BINGO's Indigenous business partner in this joint venture is Yalagan Group – a leading Aboriginal personnel resources company.

Djurwa is a profit for purpose business offering best-in-class recycling and waste services while working to improve economic participation for Aboriginal and Torres Strait Islander peoples.

OUR NETWORK





MODERN SLAVERY STATEMENT

BINGO is committed to promoting high standards of labour and human rights governance 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 individual and business modern slavery is eradicated.

We are committed to taking the necessary actions to protect vulnerable people against modern slavery. We support the Australian Government's position that there is no place for modern slavery in the Australian community, or in any global supply chains. We support the global fight against labour abuse, and we believe all businesses should be working towards supply chain transparency and accountability.

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, Toro Waste Equipment Pty Ltd and its subsidiaries for the financial year 1 July 2020 to 30 June 2021 (FY21).

BINGO is committed to continually improving our systems and processes to avoid complicity in modern slavery related to our own operations and supply chain.

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.

In 2021, COVID-19 did have an impact on the work that we were able activate. Whilst we have largely progressed well against our action plan implementation, there were several pieces of work that began later than anticipated. These included physical audits, which were established but not fully completed and the roll out of the self assessments. These pieces of work are well in progress.

OUR SUPPLY CHAIN

Identified key brands and trading names used in the course of BINGO's operations include BINGO, BINGO Industries, BINGO Waste Bins, BINGO Skip Bins, BINGO Waste Services, BINGO Commercial and TORO. Together with the Yalagan Group, a leading Supply Nation certified personnel resources provider, BINGO is a party to an incorporated joint venture, Djurwa Pty Ltd. Djurwa provides end-toend waste management and recycling services, while seeking to provide meaningful employment opportunities to vulnerable community members.

BINGO will work with Djurwra to implement modern slavery risk mitigation measures, as set out in this Modern Slavery Statement through the delivery of its services.

BINGO spent just under \$500 million across almost 2,000 suppliers last financial year. 99% of our direct spend is in Australia and we directly purchase offshore for our TORO brand, which manufactures bins in Australia. Through this work we have assessed:

- 100% of procurement category spend
- 100% of procurement categories reviewed against modern slavery
- 100% of categories provided a risk rating

BINGO's has 1,159 employees, 110 are casual and six are contractors, whilst the remaining 1,043 are permanent. Our employees span across NSW, Victoria and Queensland. Our employees undertake a range of functions from corporate support, operations at our sites including working at our plants sorting and operating machinery, driving vehicles across our 380 strong fleet and manufacturing bins for our TORO brand.



Figure 1: Indicators considered as part of BINGO's supply chain modern slavery risk assessment

We procure a diverse range of goods and services, each of which may have potential exposure to slavery and human trafficking impacts. One of the key areas of risk in our supply chain is geography and our exposure to procuring sheet metal from Vietnam and China.

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

Building on our previous work, identifying any modern slavery risks in BINGO's operations and supply chains, we refined our risk analysis by applying a risk rating across our categories and prioritising our suppliers. The prioritisation process helps to inform our due diligence framework, which defines the appropriate supplier screening and assessment pathway, according to the level of risk and influence. BINGO prioritised suppliers based on the following factors:

- National and international companies or suppliers, which are either bigger than BINGO Industries or are already required under MSA2018 to complete their own Modern Slavery Statement
- Level of risk for Industry, Product/Services Risk or Entity Risk
- Geographic risks: where the organisation is situated. either locally or overseas (namely; Vietnam and China)
- Level of influence, including BINGO's spending and long term relationships with key supply partners
- Direct relationship to risk: suppliers either directly linked to our supply chains that deliver services to clients, or directly linked to BINGO Industries operations.

Based on this prioritisation process, BINGO identified key suppliers across the following categories who should engage in the prevention of modern slavery and conduct independent due diligence. These were:

- Cleaning and security services at our landfills, recycling centers, offices and other facilities in Australia;
- Repair and maintenance across of fixed and mobile fleet and the provision of parts and services;
- Construction services particularly as we build new infrastructure to become a more circular business;
- Plant, equipment and trucks; the purchases of this equipment to refresh our fleet and keep our fleet in optimal condition; and

• Information Technology that we utilise for our staff including phones, computers and other IT services that we may outsource.

We have aligned our assessment and remediation approach to the UN Global Compact's Guiding Principles on Human Rights Due Diligence. BINGO's actions to enhance the human rights of individuals in our up and down stream supply chain, and our own operations, include:

- Policies and procedures to promote employee compliance and understanding particularly amongst staff procuring
- Internal training and the implementation of awareness programs
- Our Supplier Code of Conduct
- Inclusion of clauses within our agreements and contracts with contractors and suppliers
- Working toward annual attestation of suppliers against our Supplier Code of Conduct

RISK PROXIMITY	PRODUCTS AND SERVICES		KEY ISSUES	
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.	
	X	Travel and accommodation	Labour rights in the hospitality and travel facilitation sectors.	
Supply chain		Vehicles, plant and equipment	Labour rights, health and safety, as well as human rights and governance in the overseas supply chain of parts, equipment, components, and other manufactured goods, including the production of metal products.	
		Building materials	Labour rights, health, as well as 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, human rights and governance in the overseas supply chain of merchandise and uniforms including personal protective equipment.	

Our 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 ensures risk mitigation and compliance with regulatory requirements, insisting all suppliers act fairly, ethically and responsibly.



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 subcategories of products and services.

The risk analysis used to assess the likelihood of an issue occurring, draws on 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 operate in our supply chain beyond our 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 of all external spending and a risk assessment of BINGO's incumbent suppliers.

BINGO conducted self-assessment audits of its high-spend, highrisk 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.



In FY21 BINGO aligned its Responsible Sourcing and procurement processes with ISO 20400 Sustainable Procurement. We did this to ensure our actions to address modern slavery are being directed by a recognised international standard.

We have completed a document review and stakeholder interviews to understand current procurement and risk management practices.

This report provides a heatmap and score against ISO 20400, an overview of BINGO's performance across the different requirements of the standard, and recommendations for improvement.

ISO 20400 is structured in four sections, describing what is required to implement sustainability into the procurement function of an organisation. The four areas are:

FUNDAMENTALS

Fundamentals of sustainable procurement, which include: the principles, core subjects, risks and opportunities, and the setting of priorities.

POLICY & STRATEGY

Procurement policy and strategy for integrating sustainability at a strategic level and defining sustainable procurement for top management in order to provide direction and key intentions for the organisation.

PROCUREMENT PROCESS

Procurement process describes how sustainability is integrated into the actual functions of procurement, such as planning, assessment and review.

ENABLING

Enabling conditions and management techniques that help create the right conditions and practices, and which assist individuals with the integration of sustainability into the procurement function.

The outcomes of this gap analysis have provided BINGO with a detailed action plan. Our aim is to move the entire BINGO business into alignment with this global best practice standard.

ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS 2021

PRIORITISATION OF SUPPLIERS TO TARGET MODERN SLAVERY RISK

BINGO recognises that our procurement processes play an integral role in effectively preventing and mitigating the risk of modern slavery. To better understand the strengths and weaknesses of our processes we engaged a third party to undertake a gap analysis against the ISO20400 Sustainable Procurement Guidance. From this analysis we have drafted a roadmap of recommendations for improvement with a focus on how to better embed our responsible sourcing initiatives across the business.

Key results achieved include:

- BINGO Responsible Sourcing Roadmap development
- Improving our approach for supplier assessment and onboarding in relation to modern slavery
- Establishing a process for responding to highrisk suppliers and conducting due diligence
- A risks and opportunity management plan for the top five at risk spend categories

DUE DILIGENCE FRAMEWORK

Based on the risk and prioritisation process, BINGO has outlined the requirements for specific high-risk categories and identified the key suppliers that should be considered throughout the sourcing process, from the initial identification of need though to supplier performance management. To address the diversity of our suppliers we have created different approaches for SME suppliers and large suppliers. BINGO's risk management approach includes:

- Ensuring commitment and alignment to BINGO's Supplier Code of Conduct
- Tailored self-assessment questionnaires for onboarding
- Tailored contract requirements
- Reporting data embedded into performance management
- External supply chain audits
- Supplier training



Figure 2: BINGO's due diligence framework

EMBEDDING MODERN SLAVERY RISK MANAGEMENT INTO THE PROCUREMENT PROCESS

BINGO has developed clear objectives, and created a set of tender and evaluation criteria according to key issues, such as the risk of forced or child labour in the supply chain, or exploitation of migrant or low-skilled workforce at operational sites.

ENGAGING ON MODERN SLAVERY

We mapped our key stakeholders to identify who we need to inform, engage and partner with to increase our effectiveness and prevent and mitigate modern slavery risks.

Supplier engagement is key to our Supplier Assurance Program, and we understand that selfassessment questionnaires are only one method of understanding a supplier's maturity and ability to respond to modern slavery risks.

Based on our stakeholder mapping, BINGO developed a Stakeholder Engagement Plan that sets out a number of follow up activities that includes, engaging and working with suppliers on modern slavery, training, communications, workshops, action plans or other initiatives based on research of best practice approaches.

MODERN SLAVERY SELF-ASSESSMENT QUESTIONNAIRE

BINGO developed a modern slavery questionnaire which will be rolled out over the coming year. We tailored the questionnaire for our diverse supplier base which comprised SMEs, contractors and large national/multi-national corporations.

BINGO developed a scorecard to assist us in assessing modern slavery responses and identifying red flags that require further investigation or immediate corrective action. This process has been embedded into our due diligence framework.

FURTHER INVESTIGATION AND AUDITING OF HIGH RISK SUPPLIERS

INNOVATIVE WAY OF APPROACHING SUPPLIER SELF ASSESSMENTS

BINGO piloted the use of a voice analytics program to assess risk within our supply chain. The aim of the Remote Supplier Assessment (RSA) pilot was to overcome the issues of lengthy and costly supplier selfassessment questionnaires traditionally used in supply chain programs. This pilot involved trialling an artificial intelligence solution that spoke to suppliers rather than them having to fill out a lengthy form.

The pilot was considered a success with an 80% completion rate, an average total assessment time of less than 45 minutes per supplier, with highrisk issues and suppliers being easily identified and an overall increased confidence in assessment results.

Through this process, BINGO developed a scalable, cost-efficient solution that will enhance the business' ability to identify areas of risk in its supply chain and focus investigative and remediation efforts accordingly.

While the pilot was initially developed with a focus on identifying modern slavery risk, the scope of the assessment has been expanded to capture other environmental and sustainability risks as well. This broader scope of questions is providing highquality insights into other governance and compliance risks within our supply chain.

COMMUNICATING OUR COMMON GOAL

To ensure that our employees, contractors and suppliers align to a common goal, we updated our Procurement Policy to reflect our Human Rights Policy. The Procurement Policy now communicates our vision for responsible sourcing and articulates the principles for ethical procurement based on BINGO's Sustainaility Framework pillars and targets.



ACCESSING THE VOICE OF THE WORKER

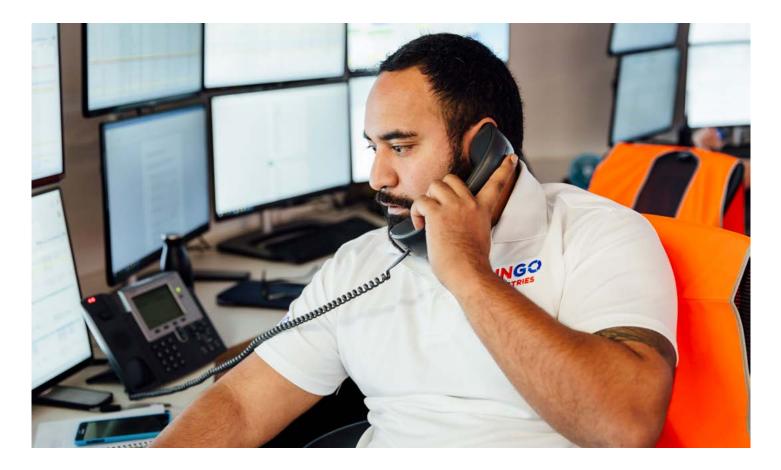
BINGO has several internal channels for raising grievances, as well as our external third-party managed Speak Up hotline (whistleblower program).

BINGO also maintains a network of Site Safety Forums that are run for and by employees which provide for effective two-way communication between management and the workforce. These mechanisms ensure the voice of the worker is encouraged and heard and we promote these regularly to employees and contractors where relevant.

In FY21 no modern slavery concerns have been raised via grievance procedures.

REMEDIATION

In the event that BINGO becomes aware of 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 take the appropriate action to embed the change. 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 act to refer the matter.



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.

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.

These mechanisms ensure the voice of the worker is encouraged and heard, and we promote these opportunities for dialogue to employees and contrcactors.

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 outline 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 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.

EFFECTIVE ASSESSMENT OF ACTIONS

BINGO's Responsible Sourcing roadmap is 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 the next phase of our Responsible Sourcing roadmap.

We believe we have a robust strategy to identify and mitigate the risk of modern slavery from our extended supply chain.

A key learning from year one was that by refining BINGO's supplier categorisation, the risk analysis could be improved. The process of examining BINGO's spend per category and an internal review of suppliers, has provided us with a better picture of our modern slavery risk profile.



BINGO engaged modern slavery and supply chain risk consultants to provide independent advice on the actions BINGO has taken to date and to help identify areas for improvement. As part of the ISO 20400 analysis on BINGO's approach to risk management and those areas in need of attention in order to be most effective. This advice included:

- The risk of modern slavery is diverse and complex, therefore suppliers should be prioritised to increase effectiveness of actions

 a prioritisation process was undertaken which informed the roll out of the due diligence framework, targeting high risk suppliers
- Supplier engagement needs to be tailored based on category risk, size of the business and location – this has been addressed in the due diligence framework and Stakeholder Engagement Plan
- To improve the effectiveness of the existing Whistleblower Policy and Grievance Mechanism, a targeted approach for high-risk supply chain is required, to ensure it is trusted and accessible and increase its effectiveness.



We are continuing to work with our supply chain to communicate the importance of modern slavery.

Applying BINGO's outlined risk-based approach, BINGO acknowledges its role in working with its suppliers to address human rights requirements, and as such, these due diligence activities were conducted as collaborative gap analysis and supply chain discovery efforts. Due diligence was designed to determine the supplier's understanding of human rights issues, identify and evaluate internal and external policies, procedures and compliance assurance mechanisms, identify risks in extended supply chains, and develop a priority corrective action plan as required.

Due diligence on one supplier has been completed while the other assessment remains ongoing. The high level assessment resulting from this due diligence is that there is a comparatively lower risk of human rights abuses occurring within the operations of the suppliers in focus. However, there is a moderate risk of human rights abuses occurring in the their supply chains due to their geographic location. This risk is largely mitigated through close and enduring supplier relationships and demonstrated practical efforts to improve supplier practices. The primary area for improvement identified is formalising compliance assurance processes and reporting.



CONSULTATION WITH RELATED REPORTING ENTITIES

GOVERNANCE AND POLICY FRAMEWORK

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 valuecreation.

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 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.

BINGO has established governance frameworks to communicate through the business about Modern Slavery program and the progression of the work being done to identify any modern slavery activity.

At the operational level there is direct oversight through to the ELT and KPIs to key staff, including the Chief Financial Officer, to deliver on this program and maintain focus on identifying any modern slavery issues.

These regular updates are also presented to the Zero Harm Board Committee. This Board Committee has responsibility for the ongoing delivery and reporting of the responsible Sourcing and Modern Slavery program.

The third and critically important facet of consultation is establishment of a quarterly update to key subsidiaries and open dialogue on modern slavery. This is important as TORO has its own procurement processes and exposures that we need to maintain focus on.

We support our subsidiaries through practical implementation of the resources used within BINGO's own program. This includes implementation of the Supplier Code of Conduct, inclusions, supplier screening and category risk assessment and supplier audits.

LOOKING AHEAD

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

Some of the ways we may enhance our modern slavery risk framework in the future include:

- Continuing implementation of ISO 20400 as a standard to ensure we have the right process in place;
- Raising awareness within the waste and recycling industry to address common challenges, helping to ensure the industry learns from best practice in other sectors;
- Following up on our due diligence practices and focus on upcoming contracts to help identify and mitigate key risks;
- 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.



PRINCIPAL GOVERNING BODY APPROVAL

This modern slavery statement was approved by the principal governing body of the BINGO INDUSTRIES LIMITED ABN 72 617 748 231 as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 17 December 2021.

This modern slavery statement is signed by a responsible member of The Board of Directors on 22 December 2021.

Anthony Shepherd Chairman of the Board of BINGO INDUSTRIES LIMITED ABN 72 617 748 231



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