



A message from BINGO CEO Chris Jeffrey

I'm pleased to present BINGO Industries' 2022 Modern Slavery Statement.

This is our third Modern Slavery Statement and it reflects our growing maturity as a business. We are pleased to report that we did not identify any instances of modern slavery in our business or across our supply chain in FY22.

A key focus of FY22 has been the implementation of best-practice sustainable supply chain management, ensuring that all our procurement activities – underpinned by our Responsible Sourcing Program - address the risk of modern slavery.

In FY21 we began aligning our procurement processes and Responsible Sourcing Program to international standard ISO 20400, Sustainable Procurement. I'm pleased to advise that for FY22 BINGO achieved a performance score of 86% in an independent review of our alignment with ISO 20400.

Over the past 12 months we developed supplier self-assessment questionnaires which all new BINGO suppliers will have to complete from January 2023.

Existing major suppliers will also be transitioned to the new supplier management system in early 2023 and be asked to complete the self-assessment questionnaire.

In addition, we engaged specialist social due diligence auditor Precision Solutions Group (PSG) to undertake modern slavery compliance audits at two of our high-risk suppliers. No modern slavery abuses were identified and the likelihood modern slavery abuses were occurring was assessed as unlikely.

BINGO continues to expand our operating footprint and on 1 July 2022 we officially entered Queensland through our acquisition of United Waste Services. BINGO spent \$420 million across approximately 1,500 suppliers in FY22, a large proportion of which are small-to-medium size enterprises.

As our business grows, we remain acutely aware that the risks associated with Modern Slavery do too. We will remain vigilant and continue to encourage positive change within our industry.

Chris JeffreyChief Executive Officer

"As our business grows, we remain acutely aware that the risks associated with Modern Slavery do too. We will remain vigilant and continue to encourage positive change within our industry."





We are BINGO

BINGO is a recycling and waste management company with operations across the east coast of Australia. 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 for further processing.

BINGO manufactures a range of recycled landscape and building products as part of its ECO Product range of aggregates, road bases, sands and mulches.



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.

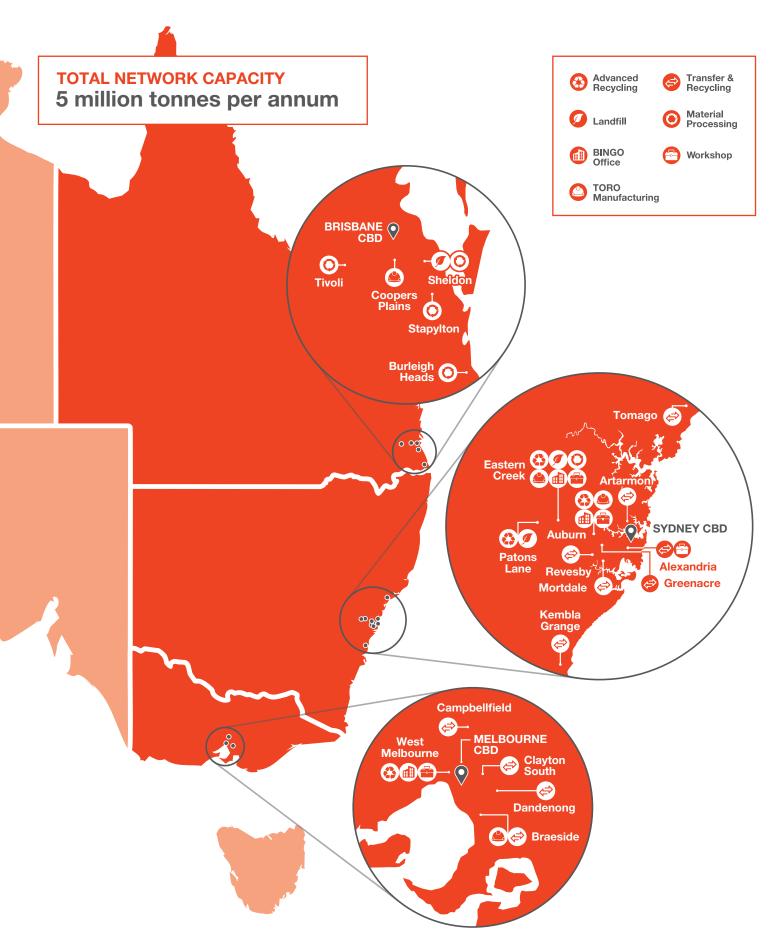
TORO services the waste management, mining and construction industries.

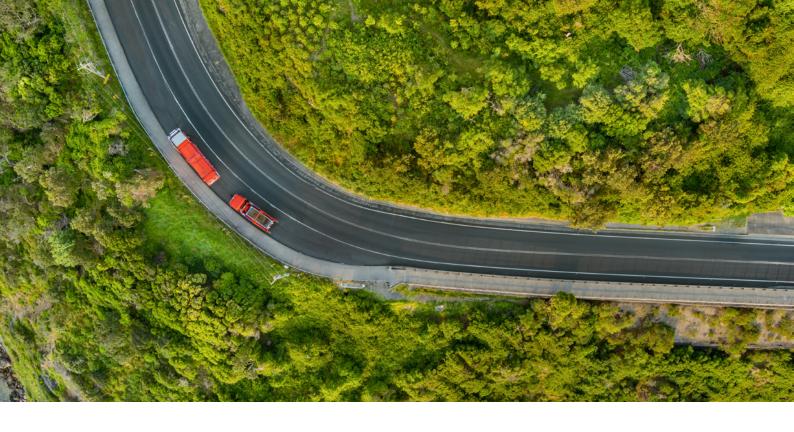
Djurwa

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 2021 to 30 June 2022 (FY22).

BINGO is committed to continuous improvement across our systems and processes to avoid complicity in modern slavery relating 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 2022, BINGO developed supplier self-assessment questionnaires which will be completed by all new suppliers and engaged specialist auditors to undertake modern slavery compliance audits of two suppliers identified as potential high risk suppliers.

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-to-end waste management and recycling services, while seeking to provide meaningful employment opportunities to vulnerable community members.

BINGO will work with Djurwa to implement modern slavery risk mitigation measures, as set out in this Modern Slavery Statement.

BINGO acquired Queensland recycling and waste management company United Waste Services on 1 July 2022 and intends to implement modern slavery risk mitigation measures during FY23.

BINGO spent just under \$420 million across almost 1,500 suppliers last financial year. 99% of our direct spend is in Australia and we directly purchase materials 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; and
- 100% of categories provided a risk rating.

BINGO has 1,223 employees, 46 are casual and 12 are fixed term, whilst the remaining 1,165 are permanent. Our employees span across New South Wales, Victoria and Queensland. Our employees undertake a range of functions from corporate support, operations at our sites including sorting waste and operating machinery, driving vehicles and manufacturing bins for our TORO brand.

Proportion of unskilled labour

- Exiobase (Global database indicators)

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

- Social Hotspot Database (Global database of indicators)

Prevalence and vulnerability country scores

- Global Slavery Index

Child rights scores and due diligence response per country

- Child Rights Index

Evidence of modern slavery issues cited in literature

- Literature Review

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 high-risk 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; and
- 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 centres, offices and other facilities in Australia;
- Repair and maintenance across our fixed and mobile fleet and the provision of parts and services;
- Construction services particularly as we build new infrastructure to support a more circular business;
- Plant, equipment and trucks; the purchases of this equipment to renew 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 Construction, repairs and Labour rights in construction activities, including labour hire. maintenance activities **Business-related services** Labour rights in business-related services and professional and professional services services, such as cleaning and security. **Direct on-shore** and on-site activities Travel and accommodation Labour rights in the hospitality and travel facilitation sectors. Labour rights, health and safety, as well as human rights Vehicles, plant and and governance in the overseas supply chain of parts, equipment equipment, components, and other manufactured goods, including the production of metal products. Labour rights, health, as well as safety and human rights **Building materials** and governance in the overseas supply chain of building materials such as cement, hardware, metals and brick. Labour rights in offshore/subcontracted corporate services **Business-related services** such as financial, travel or marketing sectors and labour and professional services rights in food production in Australia and overseas. **Supply chain** Labour rights and health and safety in electronics supply IT products and services chains. Labour rights, human rights and governance in the overseas Marketing and human supply chain of merchandise and uniforms including resources personal protective equipment.

Our analysis has shown that 99% (based on spend) 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 Supplier Code of Conduct and Procurement Policy ensures risk mitigation and compliance with regulatory requirements, insisting all suppliers act fairly, ethically and responsibly.

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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, 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 will continue to conduct 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.

Aligning with ISO 20400 – Sustainable Procurement



In FY21 BINGO began to align 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.

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. BINGO achieved a performance score of 86% (internal target was 85%) in the the latest review of BINGO's alignment with ISO 20400 by Edge Environment in FY22, up from 56% in FY21.

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 and 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.

Actions taken to address modern slavery risks

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 have engaged a third party to undertake a gap analysis against the ISO20400 Sustainable Procurement Guidance in FY21 and again in FY22. 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 high- risk suppliers and conducting due diligence; and
- 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; and
- Supplier training.

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.



Figure 2: BINGO's Due Diligence Framework

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 self-assessment 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

Supplier self-assessment questionnaires have been developed and will be given to new suppliers on BINGO's supplier management system when it is rolled out in January 2023.

Existing major suppliers will also be transitioned to the new supplier management system in early 2023 and at the same time be asked to complete the self-assessment questionnaire.

We tailored the questionnaire for our diverse supplier base which comprised SMEs, contractors and large national/multinational 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.



Auditing of high-risk suppliers

In FY22 BINGO engaged specialist social due diligence auditor Precision Solutions Group (PSG) to undertake modern slavery compliance audits of two high risk suppliers.

The two audited suppliers (clothing and mechanical repair services) were selected based on their position in our modern slavery risk matrix (due to their spend category and the type of supplier).

No modern slavery abuses were identified during either audit and the likelihood modern slavery abuses were occurring was assessed as unlikely.

PSG provided recommendations to BINGO for improved evaluation of suppliers during modern slavery compliance audits such as standarised supplier briefing and reporting templates that can be shared with suppliers. These templates align our audits with the supplier's internal modern slavery audits to gain visibility on tier two suppliers.

The above recommendations will be implemented for any audits undertaken going forward.

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).

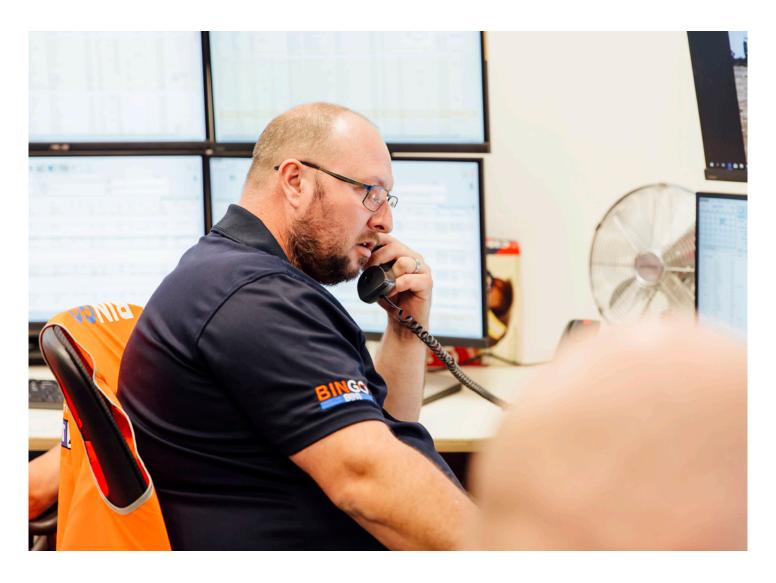
BINGO also maintains a network of Site Safety Forums that are run for and by employees which provide for effective two-way communication between management and the workforce. These mechanisms ensure the voice of the worker is encouraged and heard and we promote these regularly to employees and contractors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

In FY22 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, through 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 contractors via our online intranet and communications.

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, 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 has been completed with the implementation of the roadmap to begin 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.

The key learnings from the implementation of the roadmap is 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, to date our supplier audits were conducted as collaborative gap analysis and supply chain discovery efforts.

Our audits were 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.

The high-level assessment resulting from our supplier audits has found that there is a comparatively lower risk of human rights abuses occurring within the operations of the suppliers audited. However, there is a moderate risk of human rights abuses occurring in 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. Bingo will continue to undertake supplier audits each year on high-risk suppliers and their supply chains.





Consultation with related reporting entities

Governance and policy framework

BINGO's Board and Group Leadership Team's (GLT) decision making is underpinned by BINGO's core values - the BINGO Way - Be Safe, 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, GLT and all employees. For more information see BINGO's Corporate Governance Framework.

BINGO is committed to the highest 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 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 educate relevant employees about modern slavery risks and how to resolve any identified instances of modern slavery.

At the operational level there is direct oversight through to the GLT and KPIs to key staff 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, 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;
- Continuous improvement of modern slavery compliance audits to evaluate risks from tier two suppliers; and
- 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 23 December 2022.

This modern slavery statement is signed by a responsible member of The Board of Directors on 23 December 2022.

Anthony Shepherd

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

