

Modern Slavery Statement 2023



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The consolidated entity, being Recycle and Resource Holdings Limited became the ultimate holding company of BINGO Industries Limited and its controlled entities (“BINGO”) on 5 August 2021. BINGO is the operating group which encompasses all of BINGO’s operations and people.

Acknowledgement of Country

In the spirit of reconciliation, we acknowledge the Traditional Custodians of Country throughout Australia and acknowledge and respect their connections to land, sea and community.

BINGO acknowledges the Bundjalung Nation, Yuggera Nation, Kulin Nation, Eora Nation, Dharug Nation, Dharawal Nation and the Awabakal People, whose ancestral lands and water we operate on.

We pay respect to Elders both past and present and stand together with First Nations leaders of today and tomorrow.





“We are pleased to report that we did not identify any instances of modern slavery in our business or across our supply chain this year.”

A message from the CEO

I'm pleased to present our Modern Slavery Statement for 2023. At BINGO we acknowledge that human rights are universal and fundamental rights, freedoms and standards to which all people are entitled. We recognise that respecting and promoting human rights is integral to our social license to operate and that the commercial viability of our business will only continue in a society where human rights are upheld and promoted. We are aware of BINGO's ability to promote human rights in our society by highlighting instances of abuse of power and the inappropriate exertion of influence wherever we identify it. In particular, BINGO's vision for a "waste-free Australia" supports the protection and promotion of human rights through contributing to Australia's efforts to maintain a clean, healthy and sustainable environment.

BINGO spent \$300m in FY23 with more than 1,400 suppliers. More than 98% of this spend was with domestic suppliers. We are pleased to report that we did not identify any instances of modern slavery in our business or across our supply chain this year. During the year we continued our focus on the implementation of best-practice sustainable supply chain management and ensuring that all our procurement activities address the risk of modern slavery. Central to this has been the rollout of our supplier self-assessments, with nearly 300 assessments completed to date. Our priority has been to assess our high spend and high risk existing suppliers and all new suppliers.

Since it's inception, BINGO's modern slavery risk assessment program has engaged specialist social due diligence auditor, Precision Solutions Group, to undertake both site and desktop audits to assess our suppliers' modern slavery risks.

Over 100 GOgetters have been provided with specialist modern slavery training with a particular focus on our procurement and corporate teams. This training and the continued development of our staff will embed awareness of the risks of modern slavery across our business.

As our business grows, so do the risks associated with modern slavery. On 1 July 2022, we officially entered Queensland through our acquisition of United Waste Services, expanding our operational footprint and our supply chain. Our Queensland operations have been incorporated into our reporting for the first time this year.

We remain committed to continuous improvement and transparency on the progress of our actions related to modern slavery, and we aim to continue to lead positive change in our industry.

Chris Jeffrey
Chief Executive Officer



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.



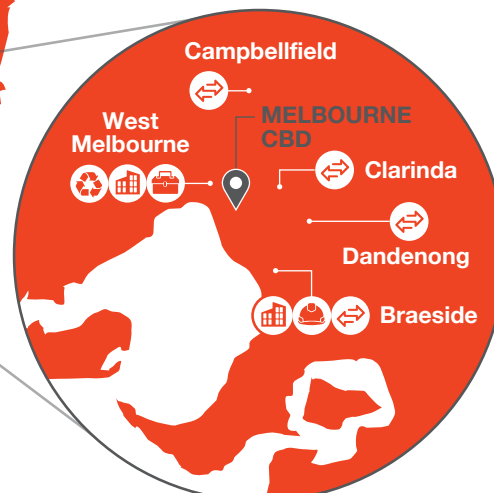
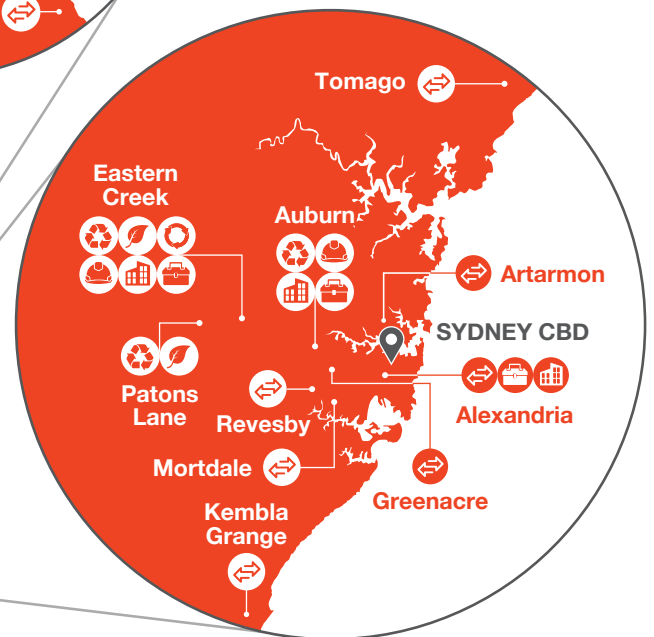
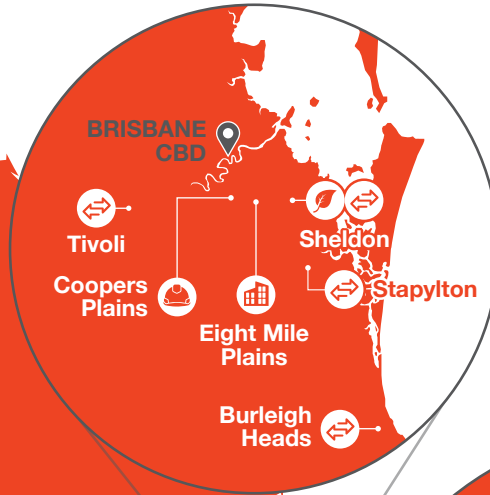
Djurwa

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 training and mentoring 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

TOTAL NETWORK CAPACITY
5 million tonnes per annum

- Advanced Recycling
- Transfer & Recycling
- Landfill
- Material Processing
- BINGO Office
- Workshop
- TORO Manufacturing





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.

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 a supplier self assessment questionnaire. This has been completed by nearly 300 new suppliers to date and will be provided to existing suppliers, starting with the high risk categories, in December 2023.

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth). This statement applies to the operations of Recycle and Resource Holdings Limited (BINGO), including BINGO Industries Limited, Bingo Holdings Pty Ltd, BINGO Recycling Pty Ltd, BINGO Waste Services Pty Ltd and BINGO Bins Pty Ltd and its subsidiaries for the financial year 1 July 2022 to 30 June 2023 (FY23).

Our supply chain



44%	\$130.49M Operations and Maintenance	5%	\$16.4M SME Spend
25%	\$74M Transport	4%	\$11.74M Information Technology
21%	\$63.46M Professional Services	1%	\$3.37M Utilities

Figure 1: BINGO's key categories of spend

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, TORO Waste Equipment and United Waste Services. Together with the Yalagan Group, a leading Supply Nation certified training and mentoring 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 indigenous community members.

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

BINGO spent \$300 million across 1,434 suppliers last financial year. 98% of our direct spend is in Australia and we directly purchase materials offshore for our TORO brand, who manufacture bins in Australia.

BINGO has 1,319 employees, 35 are casual and 26 are fixed term, whilst the remaining 1,258 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.

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, China and India.

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 Modern Slavery Act 2018 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, China and India);
- 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 with 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 our procurement team
- 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 Labour Rights Issues
 Direct on-shore and on-site activities	 Construction, repairs and maintenance activities	Construction activities, including labour hire.
	 Business-related services and professional services	Business-related services and professional services, such as cleaning and security.
	 Travel and accommodation	In the hospitality and travel facilitation sectors.
 Supply chain	 Vehicles, plant and equipment	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	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	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	Health and safety in electronics supply chains.
	 Marketing and human resources	Human rights and governance in the overseas supply chain of merchandise and uniforms including personal protective equipment.

The difference between Tier 1, 2 and 3 suppliers

Understanding the dynamics of our supply chain provides valuable perspectives on the resilience and risks to our business. This enhanced visibility of our supply chain fosters the development of a robust and sustainable business.

This underscores the significance of adopting supplier tiering or systematically classifying our suppliers within the context of our supply chain especially for the assessment of modern slavery risks.

Suppliers can be broken down into three tiers:

Tier 1 suppliers are our direct suppliers.

Tier 2 suppliers are our suppliers' suppliers or companies that subcontract to our direct suppliers.

Tier 3 suppliers are the suppliers or subcontractors of our tier 2 suppliers.

Responsible sourcing program and due diligence

Responsible sourcing program

BINGO has developed a Supplier Assurance Program which enables us to identify and address the risks of slavery and human trafficking in our supply chain. The risk analysis used draws on market models that trace commodities and services to assess the likelihood of modern slavery issues across supply chains. This includes the generic risk of Tier 1 suppliers (sourced in Australia), Tier 2 and Tier 3 suppliers who operate in our supply chain beyond our Tier 1 suppliers.

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 supplier self-assessment audits of its high-spend, high-risk suppliers using the Slavery and Trafficking Risk Template. It's an international standard used to assist companies in complying with modern slavery legislation, to improve visibility and transparency to our 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 conducted 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.

BINGO will now be undertaking an ISO 20400 review on a bi-annual basis with the next review to be undertaken in FY24.

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.

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.

Procurement process

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

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. 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 achievements to date 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 risk 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 through to supplier performance management.

To address the diversity of our suppliers, we have developed different approaches for SME and larger suppliers. BINGO's risk management approach as shown in Figure 2 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.

Engaging on modern slavery

We mapped our key stakeholders to identify who we need to



Figure 2: BINGO's Due Diligence Framework

inform, engage and partner with to increase our effectiveness and prevent and mitigate 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 to date 297 questionnaires has been completed by new suppliers.

Existing major suppliers will also be transitioned to the new supplier management system from December 2023 and will be required to complete the self-assessment questionnaire.

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.

Communicating our common goal

To ensure that our employees, contractors and suppliers

Auditing of high-risk suppliers

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

The selection of the two audited suppliers (clothing and mechanical repair services) was based on their position in our modern slavery risk matrix, determined by their spend category and supplier type.

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 standardised 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.

No audits were conducted in FY23, however, the above recommendations will be implemented for the audits undertaken in 2024.

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 Sustainability 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 allows for effective two-way communication between management and the workforce. These mechanisms ensure the voice of the worker is encouraged and heard.

In FY23, no modern slavery concerns were 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 mechanisms and policies reflect our ethics and values, whilst ensuring the voice of the worker is encouraged and heard. BINGO promotes these opportunities for dialogue to employees and contractors via our intranet "The LOOP" and other internal channels.



Current performance

Where relevant, BINGO provides 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 employees who 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. To date over 100 GOgetters have completed modern slavery awareness training.

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 within our extended supply chain. The key learning 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, provides us with a clearer understanding of our modern slavery risks profile, and this process is ongoing.



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 (Safe to Speak Up) 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 continue 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 supplier audits have been conducted 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 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 to ensure 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

Responsible Sourcing Program

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.



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 collaborating 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 processes 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 high risk tier 1 and tier 2 suppliers



Principal governing body approval

This modern slavery statement was approved by the principal governing body of Recycle and Resource Holdings Limited ABN 20 649 347 302 as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 22 December 2023.

This modern slavery statement is signed by a responsible member of The Board of Directors on 22 December 2023.

Anthony Shepherd, AO
Chairman of the Board of
Recycle and Resource Holdings Limited
ABN 20 649 347 302



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