

## **FY22 MODERN SLAVERY STATEMENT**

This Modern Slavery Statement covers the activities of Container Exchange (QLD) Limited ACN 622 570 209 (**COEX**), during our financial year ended 30 June 2022 (**FY22**), to identify and mitigate any potential modern slavery risks in COEX's operations and supply chain.

### **A. Introduction**

COEX is appointed by the Queensland Government as a not-for-profit organisation responsible for implementing, managing, and advancing the Container Refund Scheme 'Containers for Change' in Queensland (**Scheme**). The Scheme is authorised under *the Waste Reduction & Recycling Act 2011* (Qld) and COEX reports to Queensland's Minister for Environment and the Great Barrier Reef.

COEX manages a network of more than 300 collection refund points (**CRPs**) across Queensland incorporating depots, reverse-vending machine depots, bag drops and pop ups, with 83 independent operators contracted to run the CRPs in the Scheme.

As an Australian business generating annual revenue in excess of AU\$100 million, we acknowledge that COEX is required to publish an annual Modern Slavery Statement, in accordance with Section 13 of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). This is COEX's Modern Slavery Statement, which we have prepared in relation to FY22 (**FY22 Modern Slavery Statement**).

In this FY22 Modern Slavery Statement:

1. Modern slavery refers to situations of serious exploitation, in which coercion, threats or deception are used to exploit victims and deprive them of their freedoms (including amongst others, exploitative practices such as human trafficking, slavery, forced labour and child labour); and
2. Modern slavery risk refers to the prospect of a practice involving modern slavery occurring in a business' operations and/or supply chain.

### **B. Position Statement**

COEX will not accept the existence of any form of modern slavery in connection with our business. We recognise our responsibility to work with our members, customers, employees, suppliers, contractors, buyers of our recyclable commodities and all other relevant stakeholders, to identify and mitigate any modern slavery risks in our operations and supply chain.

### **C. Our Organisational Structure**

COEX is an Australian public company limited by guarantee. COEX has two members, Coca-Cola Europacific Partners Australia Pty Ltd ACN 076 594 119 and Lion Pty Ltd ACN 128 004 268. COEX's registered office is Level 17, 100 Creek Street Brisbane, Queensland, 4000.

COEX is not part of a larger corporate group of entities, and does not own or control other entities.

### **D. Our Business**

#### *Operations*

COEX is the not-for-profit organisation responsible for implementing, managing, and advancing the Scheme in Queensland. COEX employs approximately 84 people and manages approximately 100 independent contracts including CRP operators, processing (sorting) of containers, logistics between CRPs, processors and sale of the recyclable materials. For further information about COEX's operations, please refer to COEX's website ([www.containerexchange.com.au](http://www.containerexchange.com.au)).



## Supply Chain

Category	Details
Technology used in the Scheme	Consistent with standard commercial practice, COEX facilitates procurement of technology for use in its operations.
Outsourced back-office services	COEX has a services agreement with Container Exchange (Services) Pty Ltd ACN 623 565 471 ( <b>CES</b> ) to provide certain services, including accounts payable and customer call center support.
Customers (Suppliers)	COEX receives containers sold for consumption in Queensland, from persons presenting such containers for deposit at a CRP.
Operators (various)	COEX contracts with numerous operators for various purposes, including but not limited to, CRP operations, processors, and logistics.

## E. Our Approach, Risk Assessment & Mitigation Plan

### Approach

In preparation for compliance with the Modern Slavery Act (including publication of this FY22 Modern Slavery Statement), COEX's Management:

1. Conducted an assessment of the modern slavery risks which are presented by COEX's unique operations and supply chain (**Risk Assessment**); and
2. Took various actions, to mitigate the potential modern slavery risks which we identified as part of the Risk Assessment (**Actions**).

Further details of the potential modern slavery risks which we identified as part of the Risk Assessment and the Actions which we took to mitigate those modern slavery risks are outlined below in this FY22 Modern Slavery Statement.

### *Risk Assessment – potential modern slavery risks*

The Risk Assessment identified the following potential modern slavery risks in relation to COEX's operations and supply chain:

Business Area	Modern Slavery Risk	Description of Modern Slavery Risk
Operations	Commodity risks	That recyclable commodities which COEX collects are sold to buyers who (directly or indirectly) engage in any practices which might be considered to constitute modern slavery.
Operations & Supply Chain	Workforce risks	That any person in COEX's workforce or operators' workforce, is subject to any conditions which might be considered to constitute modern slavery.
Supply Chain	Supply chain risks	That there are modern slavery risks in the operations and/or supply chains of COEX's various contractors and suppliers: <ul style="list-style-type: none"><li>• supply of technology – the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, due to the technical nature of</li></ul>



		<p>these goods and the strong reputations of the supplier (being CES);</p> <ul style="list-style-type: none"><li>• specialist logistics service providers – the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, given that COEX's various service providers are well-reputed professionals in their respective fields and are physically located in Australia; and</li><li>• collection point partners – the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, given that COEX's contracted partners are large and small businesses and community organisations which are physically located in Australia.</li><li>• Material Recovery Facility operators – These contractors are paid recovery amounts for containers recovered through their contracted services with the respective local councils. The Risk Assessment concluded that material recovery activities performed by these facilities are considered to present low modern slavery risk.</li><li>• Processors - the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, given that COEX's contracted partners are large and small businesses and community organisations which are physically located in Australia.</li></ul>
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#### *Actions – mitigation of potential modern slavery risks*

During FY22, COEX took the following actions to mitigate the potential of modern slavery risks which were identified as part of the Risk Assessment (see above):

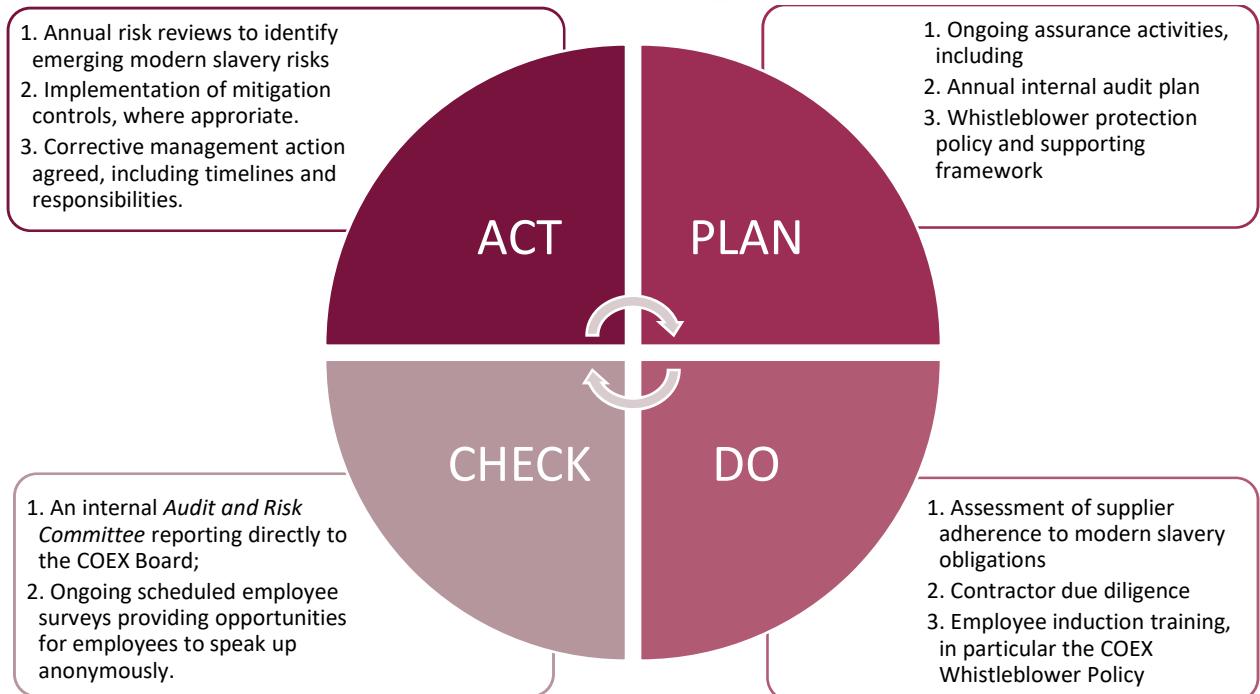
Business Area	Modern Slavery Risk	Action taken to mitigate Modern Slavery Risk
Operations	Commodity risks	<p>Due diligence checks are performed on all buyers prior to providing access to purchase material.</p> <p>Regular risk-based audits are performed across multiple purchasers.</p> <p>With the introduction of the waste export ban, through the <i>Recycling and Waste Reduction Act 2020</i> (Cth), many purchasers of Scheme material are required to obtain a waste export license.</p>
Operations & Supply Chain	Workforce risks	<p>Scheme material, being used eligible beverage containers, is supplied by the Queensland public and limited to beverages sold for consumption within Queensland.</p> <p>Our terms and conditions prohibit accounts by children under the age of 13 years. Parental consent is required for individuals between 13 and 18 years of age.</p> <p>While being independent operators, all parties in the supply</p>



		<p>chain are Australian entities (Container Refund Point Operators (<b>CRPOs</b>), Logistics providers, and Processors) and are both legislatively and contractually required to adhere to all Australian laws, including all Work Health and Safety (<b>WHS</b>) and Modern Slavery laws.</p> <p>Quarterly declarations are received from CRPOs, declaring that they adhere to all applicable Australian legislative requirements, including but not limited to taking steps to ensure compliance with relevant employment legislation and industrial instruments.</p> <p>Multiple avenues for whistleblower disclosures are available for anonymously reporting suspected breaches of legislation and 'an improper state of affairs'. No disclosures concerning modern slavery have been reported.</p>
Supply Chain	Supply chain risks	<p>Backend technology infrastructure is provided by an Australian entity, and is both legislatively and contractually required to adhere to all Australian laws, including WHS and Modern Slavery laws.</p> <p>The logistics industry is a heavily regulated industry with specific requirements for modern award for payment to workers and is limited to licence holders, as such, there is nil risk to child labour, and limited risk to modern slavery.</p> <p>The Queensland public are the ultimate supplier of Scheme material, being eligible used beverage containers.</p> <p>Eligibility is directly related to the provenance of material, i.e. being sold for consumption in Queensland, or a corresponding domestic jurisdiction.</p>

#### F. Assessing the Effectiveness of Our Actions

COEX has an ongoing assessment process to measure and improve its culture of identifying and remediating modern slavery in its supply chain. COEX monitors for any incidents of modern slavery through its risk assessments and audit processes. These measures for FY22 include steps to plan, do, check and act:



COEX takes its responsibility to identify and remediate modern slavery very seriously and will continue to work on developing its frameworks and processes to improve its review of the effectiveness of its actions to assess and address modern slavery risks in its operations and supply chains.

#### **G. Consultation Process**

This statement was prepared in consultation with internal stakeholders of COEX. We advise that COEX does not own or control other entities, and therefore sections 14 and 16(1)(f) of the *Modern Slavery Act* do not apply.

#### **H. Impact of COVID-19**

In response to the “Modern Slavery Act: Information for reporting entities about the impacts of coronavirus” guidance which the Department of Home Affairs published on 21 April 2020, we note that:

1. The novel coronavirus (**COVID-19**) pandemic did not impede COEX’s ability to conduct the Risk Assessment, complete the Actions or prepare this Modern Slavery Statement;
2. COEX have maintained our supplier relationships and fostered open communication with our suppliers about COVID- 19 risks; and
3. COEX maintained a number of health and safety measures introduced into our operations in FY21, in an effort to ensure that we continue running our business during the COVID-19 pandemic, whilst also ensuring the safety, health and wellbeing of all COEX staff, contractors, customers and members of the public.

As at the date of this FY22 Modern Slavery Statement, we are not aware of the COVID-19 pandemic having caused any additional modern slavery risks in our operations and/or supply chain.

#### **I. Our Plans for FY23**

During FY23, COEX plans to review the identification (and mitigation) of potential modern slavery risks, prioritising our activities based on:



1. The identification (and mitigation) of any new modern slavery risks which arise in our operations and/or supply chain; and
2. Any inadequacies which we identify in relation to the ability for our existing Actions to appropriately mitigate the potential modern slavery risks which we have identified (and will, in the future, identify) in relation to our operations and/or supply chain.

This FY22 Modern Slavery Statement has been approved by the Board of Directors of Container Exchange (QLD) Limited.

Signed:

*Andrew Clark*

Andrew Clark (Sep 28, 2022 14:50 GMT+10)

Andrew Clark

Acting Chair

Container Exchange (QLD) Limited

Date: Sep 28, 2022