



MODERN SLAVERY STATEMENT

FY2024-25

CONTENTS

Introduction	3
Our operations	3
Our risks	4
Our actions to assess and address risks	5
Review, reflection, and future commitments	6
Actions completed since last report	6
Future commitments for 2025-2026	6
Approval	6

Reporting criteria

MODERN SLAVERY ACT REPORTING CRITERIA	RELEVANT SECTION
a. Identify the reporting entity.	Introduction Pg 3
b. Describe the reporting entity’s structure, operations and supply chains.	Our operations Pg 3
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Our risks Pg 4
d. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Our actions Pg 5
e. Describe how the reporting entity assesses the effectiveness of these actions.	Refer to Assessing effectiveness section, which outlines indicators and review processes overseen by WARRRL’s Audit and Risk Committee. Pg 5
f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	Not applicable – WARRRL does not own or control other entities.
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant	Nil

Introduction

This Modern Slavery Statement is made by Western Australia Return Recycle Renew Limited (WARRRL) ACN 629 983 615, a not-for-profit organisation appointed by the State Government of Western Australia to coordinate WA's container deposit scheme (CDS), Containers for Change.

WARRRL denounces all forms of modern slavery, including forced labour, child labour, servitude, human trafficking, and other forms of exploitation. We recognise that modern slavery is often linked with wider systemic issues such as poverty, discrimination, and economic vulnerability, and that businesses of all sizes have an obligation to act.

We acknowledge modern slavery as a global issue requiring collective, multi-stakeholder action, and commit to continually strengthening our approach. We aim to embed modern slavery risk management into our broader governance, risk and compliance frameworks, and ensure that our operations and supply chains reflect our values of integrity, accountability, and fairness.

WARRRL acknowledges the broader national focus on enhancing due diligence practices in line with evolving expectations. We are committed to continually reviewing and strengthening our approach to reflect changing legislation, emerging guidance and better-practice standards.

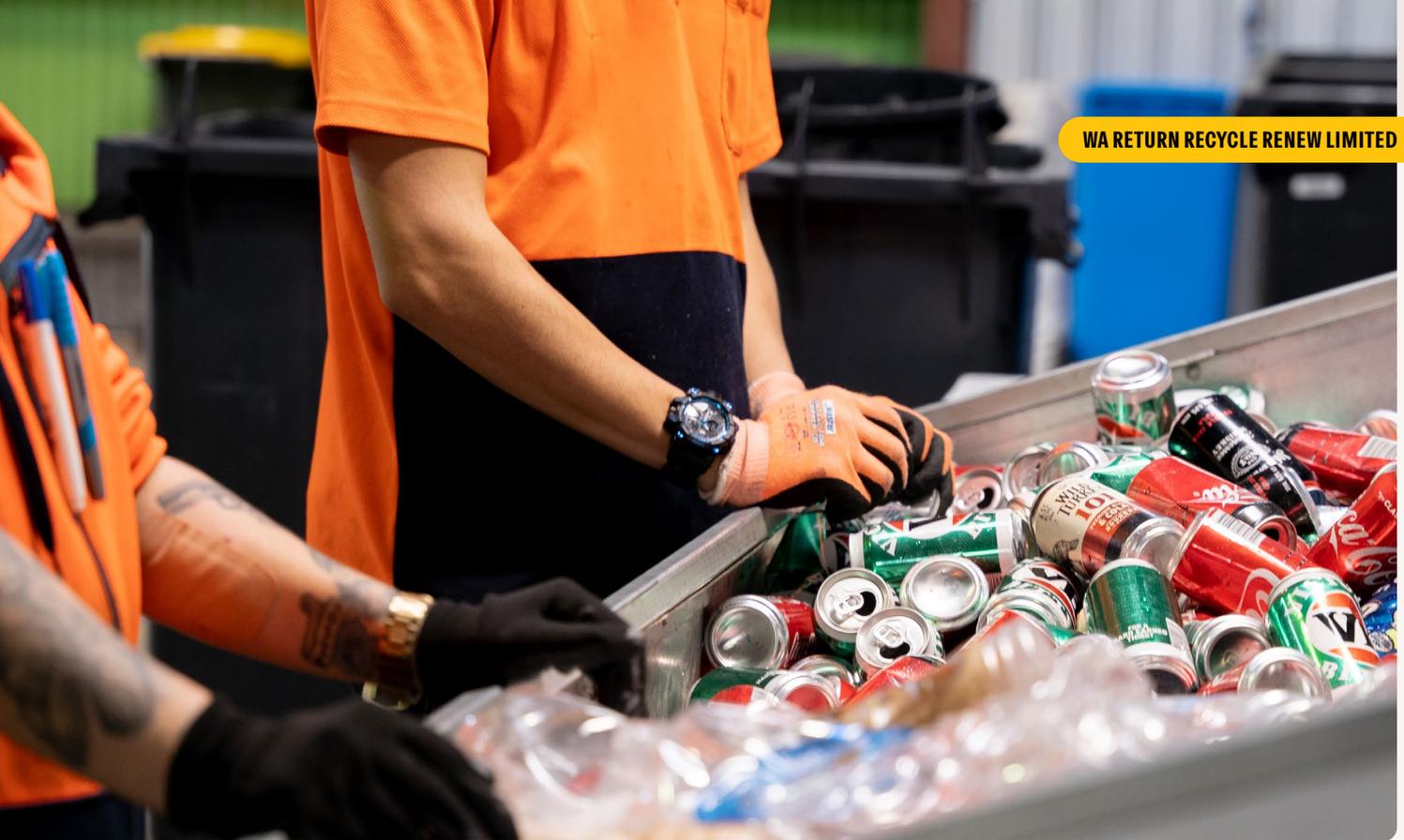
Our operations

WARRRL is responsible for the day-to-day governance and administration of the WA CDS. To fulfil this function, WARRRL engages specialist providers and business partners across Western Australia.

Our key responsibilities include:

- overseeing the refund point collection network and monitoring performance against obligations;
- managing transportation, processing, and recycling of Scheme materials post redemption including oversight of material recycling facilities (MRFs);
- overseeing and ensuring product stewardship for the Scheme, including risk management oversight compliance and assurance activities; and
- conducting auditing and compliance monitoring of Scheme participants including beverage suppliers, RPOs, material recovery facilities, exporters and other contracted parties.

Although WARRRL is a relatively small entity with approximately 60 employees, it has a broad footprint throughout Western Australia with a diverse array of business partners and suppliers ranging from large corporations and small sole businesses and community based organisations.



Our risks

WARRRL recognises that modern slavery risks can exist in any organisation or supply chain, regardless of size or sector. Our analysis has identified that the following risk areas are most relevant to us:

1. Labour practices at refund points and processing facilities – particularly where work is undertaken by casual or vulnerable labour in regional and remote communities.
2. Transport and logistics providers – sectors that may rely on contract or seasonal workforces.
3. Supply of consumables and equipment – particularly where goods are manufactured offshore in countries with known higher prevalence of modern slavery.
4. Service providers – including cleaning, security, and other contracted services where low-wage or vulnerable groups may be at greater risk of exploitation.

Most of WARRRL’s first-tier contracted entities operate solely in Australia, subject to Australian workplace laws. Those with international operations are already required to report under the Commonwealth Modern Slavery Act 2018, and WARRRL leverages these disclosures as part of our risk review.

We require all contracts to include modern slavery clauses mandating ethical conduct, reporting obligations, and the right for WARRRL to conduct compliance checks. Standard contracts are published transparently on our website: warrml.com.au/reporting-agreements.

Our actions to assess and address risks

WARRRL adopts a risk based and continuous improvement approach to addressing modern slavery, including:

- **Contractual obligations**

Embedding modern slavery compliance clauses in all commercial agreements.

- **Supplier due diligence**

WARRRL applies a structured process proportionate to supplier risks including pre-screening (ABN, sanctions and public register checks) and reviewing suppliers Modern Slavery Statements where applicable.

- **Training and awareness**

Release of a suite of training materials for refund point operators, equipping them to identify, prevent, and escalate concerns.

- **Compliance monitoring**

Site inspections, audits, and annual compliance reviews now explicitly consider modern slavery indicators.

- **Speak Up services**

Maintaining anonymous reporting channels to encourage disclosures of unethical conduct, including modern slavery concerns.

- **Engagement with peers and government**

Working collaboratively with other container deposit scheme coordinators and regulators across Australia to share learnings.

- **Assessing effectiveness**

WARRRL measures the effectiveness of its actions through quantitative and qualitative indicators such as modern-slavery-related findings or grievances received via Speak Up channels; Completion rate of modern slavery awareness training across WARRRL employees and refund point operators; and any Audit outcomes and remedial actions closed within specified timeframes.

Review, reflection, and future commitments

At the time of preparing this statement, WARRRL has not identified, nor received reports of, Modern Slavery in its operations, supply chains or in connection to the Scheme. However, it is recognised that the absence of evidence is not evidence of absence and WARRRL are committed to improving its capacity to detect risks.

Actions completed since last report

- Rolled out of a suite of accessible training material for the refund point network on modern slavery, ensuring the refund point network is aware of and able to identify, prevent and report occurrences of Modern Slavery;
- Implemented audit tools with prompts and 'red flag' indicators for auditors and inspectors.
- Undertaken contract reviews to ensure consistent inclusion of Modern Slavery clauses.

FUTURE COMMITMENTS FOR 2025-2026

- Review of WARRRL's crisis management plans to ensure suitable measures are in place if modern slavery is detected within WARRRL's supply chain.
- Enhancing our risk assessment tools to better identify and mitigate risks.
- Development of a suite of toolbox style videos for use across the Scheme network.
- Subscribe to various industry channels to observe any changes to Modern Slavery legislation.
- Strengthen supplier engagement and transparency by developing a supplier self-assessment questionnaire that can enhance visibility beyond Tier 1.
- Explore opportunities to strengthen our approach by embedding survivor informed perspectives into training and awareness content. Connecting with recognised support organisations to incorporate materials shaped by people with lived experience of modern slavery.

Approval

This statement was approved by the Board of Directors for WA Return Recycle Renew Limited on 24 November 2025.



Tim Cusack, Chief Executive Officer:
WA Return Recycle Renew Limited