

MODERN SLAVERY STATEMENT 2024



*At locations within scope as per schedule.



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REVISION HISTORY

Version	Revision date	Authorised by	Comments
1.0	February 2021	Directors	First Modern Safety Statement
2.0	February 2022	Directors	Document review
3.0	February 2023	Directors	Document review
4.0	February 2024	Directors	Document review (reporting period 2023 calendar year)
5.0	February 2025	Directors	Document review (reporting period 2024 calendar year)

1.0 INTRODUCTION

This Modern Slavery Statement is intended to comply with the requirements of the Modern Slavery Act 2018 - **(Cth) Modern Slavery Act**.

This statement is submitted as a joint statement for the Solo Group of companies reporting entities as defined in section 5 of the same Act.

2.0 BUSINESS ACTIVITIES

The Solo Group of companies' is an Australian owned and operated family business, which has operated since 1932. Established locally in 1990, Solo Resource Recovery offers a range of waste and resource recovery services to industry, commerce and homes throughout New South Wales, South Australia, Victoria, Western Australia and Queensland. These services include waste collection services, domestic, recycling and organics, liquid waste, waste water and sludge removal and treatment, industrial bins, medical waste transfer and industrial services, including underground asset locations and public utility planning as well as other customised waste management solutions.

The Group currently employs around 801 people nationally.

The size, nature, diversity and geographical locations of operations conducted by the Solo Group opens to risk as identified in the **Australian Modern Slavery Act 2018**.

The below reporting entities are under the control of the same integrated management system operating under the same policy directives from the same board of directors.

Reporting entities are listed in the following table.

Solo Resource Recovery
Solo Waste
Solo Water
Rico Recovery Systems
Richmond Waste Services
Pellet Heaters Australia

- **Structure:**

This refers to the organizational hierarchy and how the reporting entity is structured. Solo Group of companies encompasses all of the above mentioned entities, Solo Resource Recovery being the main business in the business structure and the rest of the companies the subsidiaries. Head office is based in norther NSW and services the rest of the subsidiaries. The relationship of subsidiaries are directly related to the main company, some providing wide range of services.

- **Operations:**

This encompasses the day-to-day activities of the entity, including how goods or services are produced, delivered, and sold.

Solo Resource Recovery is mainly service provider, which includes range of waste and resource recovery services to industry, commerce and homes. Companies subsidiaries are

mainly service providers as well, expect for Pellet Heaters Australia, which makes a product (Australian Made and delivered directly to the customer).

- **Supply Chains:**

This refers to the network of individuals, companies, and organizations that are involved in the production and delivery of goods or services. By describing these elements, a Modern Slavery Statement provides a comprehensive overview of the reporting entity's activities and helps identify potential areas where modern slavery risks might exist. This information is essential for assessing the entity's risks and implementing appropriate measures to address them.

For the most above mentioned subsidiaries only services provided, however to assist with services provided, trucks are built Australian made, but the bodies are provide by the external provider.

3.0 CONSULTATION WITH RELATED ENTITIES

A consultation process has been undertaken with all relevant current operational managers and training will be continually developed to ensure that people accountable are taking the appropriate steps to ensure compliance to the requirements of this statement and the associated policy directive.

The Company's goals, approaches and commitments towards ensuring that we work continually towards identifying and managing these risks are supported within our Modern Slavery Response Policy Statement.

3.1 MODERN SLAVERY RESPONSE POLICY STATEMENT

All employment with the Solo group, referred to hereafter as "The Company" is voluntary.

The Company does not use or condone, child or forced labour in any of its operations or premises and works to ensure these practices are not present in its workforce or supply chain.

The Company does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude.

The Company abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.

Where the Company is made aware of modern slavery practices by stakeholders or within its supply chain, the Company will investigate all claims and if valid, resolve the issue in line with the values expressed in this Policy.

The Company will provide training with the aim of educating applicable employees and contractors on signs that could indicate modern slavery, due diligence practices for engaging suppliers, auditing existing suppliers and what action an employee or contractor can take if they have a concern in relation to modern slavery.

The Company will conduct risk assessments to determine which parts of the business and supply chains are most at risk from modern slavery to ensure focus on those areas.

This Policy will be used to underpin and inform any statement on modern slavery that the Company is required to produce as a result of legislative requirements.

The Company expects its suppliers to have similar values to the Company in relation to modern slavery.

The Company engages with suppliers to promote and support anti-slavery practices throughout the wider supply chain.

The Company is committed to introducing anti-slavery obligations in all supplier contracts that present with a risk. As part of their contractual obligations, suppliers will agree to undertake a process so the Company can gauge the supplier's ongoing commitment to eradicating modern slavery within its own business and those of its own suppliers.

4.0 KEY OPERATIONAL ACTIVITY

The Groups key operations and core business is within the waste management sector; however the groups activities are diverse and include the following.

4.1 WASTE MANAGEMENT

The Group delivers a range of waste management industry related services including:

- Municipal kerbside waste, recycling and organics collection
- Commercial collection
- Industrial and liquid waste solutions
- Waste treatment, storage and processing, and
- Waste facility management including landfills, transfer stations and satellite waste hoppers.

4.2 INDUSTRIAL SERVICES

The Group specialises in a number of industrial services related activities including:

- Non destructive digging (NDD)
- Bulk liquid waste transport and disposal
- Asset location
- Drain cleaning
- High pressure water blasting
- CCTV Survey investigation and reporting
- Tank cleaning
- Civil infrastructure asset maintenance

- Geotechnical investigation
- Dredging and sludge removal, and
- Dangerous goods transport and management

4.3 WATER UTILITY PROVISION

The group has a water utility division that has projects managing water utility services including:

- Provision of potable drinking water
- Sewerage treatment, and
- Provision of recycled water.

4.4 DESIGN ENGINEERING AND MANUFACTURING

The group has a number of manufacturing and engineering arms that include:

- Design engineering and manufacturing of waste collection vehicles
- Design engineering and manufacturing of industrial services vehicles
- Engineering and manufacturing of skips, bins, compactors and related products, and
- Manufacturing of wood pellet products.

5.0 SUPPLY CHAINS

The Group sources its external supply chain required products from Australian providers at every opportunity and wherever possible providing a level of insulation against conducting business with supply chains that may source products from lesser regulated global economic regions.

The group's business divisions conducted an analysis during 2022 to identify and assess risks of modern slavery practices that may be present in relation to our supply chain and business operations.

6.0 APPROACH AND STRATEGY

The Group will perform due diligence when engaging service providers, contractors and supplier contracts through the implementation of the groups Modern Slavery Management Plan.

Managers acknowledge that they are accountable for addressing modern slavery issues within their operations when engaging service providers, contractors and supplier contracts.

The principles of the Modern Slavery Response Policy Statement are to be complied with and or incorporated into related policies and procedures within all areas of the business.

The policy applies to all persons working for, on behalf of, or providing services to, the Solo Group of companies in any capacity, including:

- Management
- Employees
- Suppliers
- Contractors
- Consultants and any other third-party representatives

The Group expects that all who have, or seek, a relationship with the Solo Group to familiarise themselves with this Policy and to act in a way that is consistent with its values.

7.0 MODERN SLAVERY RISK MANAGEMENT AND MINIMUM STANDARDS

7.1 ACCOUNTABILITY

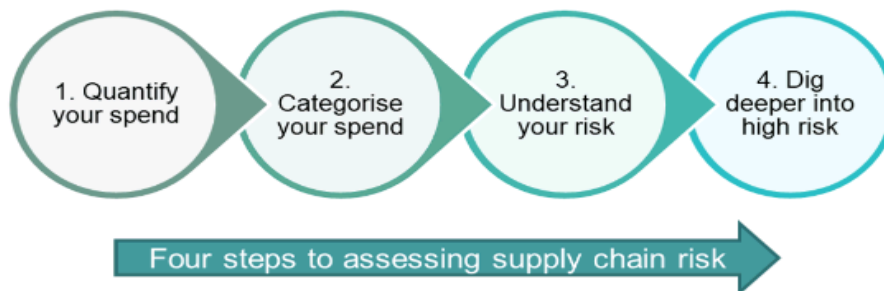
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Managers acknowledge that they are accountable for addressing modern slavery issues within their operations when engaging service providers, contractors and supplier contracts.

7.2 RISK ASSESSMENT STRATEGY

The Company will assess the risk in relation to Modern Slavery Legislation firstly at a national level using a spend analysis to identify relationships with organisations that are at a higher risk of being connected to implications of modern slavery practices.

This will be achieved by conducting the following process.



7.2.1 QUANTIFYING RISK

All of our suppliers are categorised according to the amount that the company spends with them. Risk can be characterised as a combination of spend and potential exposure to modern slavery practices.

7.2.2 CATEGORISING RISK

Suppliers are sorted into categories determine by what they are supplying, goods or services. The risk is then determined by the amount of spend in the following categories:

- Category A - ☒\$1,000,000.00
- Category B - ≥ \$500,000.00
- Category C - ≥ \$100,000.00

7.2.3 UNDERSTAND THE RISK

The company will request specific information from categorised suppliers that will assist in determining the level of risk of modern slavery practices that may be inherent with the supplier. This could be as simple as sending them a questionnaire and a request for information.

For example, if a company has a high spend category and limited policy, or procedure for managing compliance around modern slavery, further information or evidence may be required of that supplier.

IMS-ENVM-F-3796 Supplier Questionnaire - Sustainable Procurement and Solo IMS-COMP-F-0894 - Modern Slavery Questionnaire have been developed to capture required information.

7.2.4 MANAGING THE RISK

Focussing on the suppliers listed in the aforementioned categories that have been identified as having the most significant risk of modern slavery implications, the company will undertake a more specific and detailed risk assessment, or for the largest and riskiest suppliers, undertaking a site-based audit.

Questions asked and evidence required will relate to things such as the nature of their workforce, and what policies or management systems they have in place along with how they manage their own supply chain.

Analysing information provided, the company assesses effectiveness of the actions taken and controls in place. The company reviews information provided by the suppliers, analyses, records and based on the outcome of the reviews makes decision if supplier is suitable and included in the preferred supplier list. By putting all of the controls in place mentioned above, Solo Resource Recovery and any of its subsidiaries can make only suppliers listed on preferred supplier list are in use.

8.0 MODERN SLAVERY RISKS

Potential risks of modern slavery practises in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls are listed below:

- Forced or bonded labour
- Child labour
- Record keeping
- Working hours
- Discrimination harassment or abuse
- Working conditions
- Migrant workers

To minimise the risks, the following minimum standards are in place and required of stakeholders in the supply chain.

NO FORCED OR BONDED LABOUR

Employment shall be freely chosen. Suppliers shall:

- Not use any type of **forced labour** (any work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person), **bonded labour** (work which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange) or **indentured labour** (in which an employer forbids workers from leaving employment at the worker's discretion);
- Respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment; and;
- Ensure that workers are free to leave their employer after reasonable notice.

NO CHILD LABOUR

Suppliers shall comply with the minimum legal working age in the country in question or in the absence of such law, by the International Labour Organisation (ILO) Convention 138.

- Suppliers must be able to verify the age of all employees to ensure compliance.
- Suppliers must accept the principles of remediation of child and under age workers, and where such labour is discovered suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.

TRANSPARENT RECORD KEEPING

Suppliers must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits.

- Record keeping must be accurate and transparent. Workers must be provided with written and understandable information about their employment conditions before they enter employment and about their wages for each pay period.
- Deductions from wages for disciplinary measures or any deductions from wages not provided for by law shall not occur without the express permission of the worker concerned.
- All disciplinary measures should be recorded.

WORKING HOURS

Working hours must comply with local laws.

- Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable ILO convention.
- Overtime shall be agreed, shall not be excessive, shall not be requested on a regular basis and shall be compensated as prescribed by applicable local laws.

NO DISCRIMINATION HARASSMENT OR ABUSE

All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation.

- Suppliers must ensure that they provide an environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.
- Workers shall be treated with dignity and respect. In particular, suppliers will provide a workplace free from harassment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.

SAFE WORKING CONDITIONS

Suppliers shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards.

- Workers shall receive adequate and regular training to perform their jobs in a safe manner.
- Personal protective equipment and machinery safeguards shall be supplied and workers trained in their use.
- Where suppliers provide accommodation it shall be clean, safe and meet the basic needs of workers.
- Workers will have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation.
- Workers have the right to refuse work that is unsafe.

MIGRANT WORKERS

Migrant workers shall have the same entitlements as local workers as stipulated by local law. Any commissions and other fees in connection with employment of migrant workers must be covered by the employer.

- The employer must not require the worker to surrender identification documents.
- Workers employed through a third party agent or contractors are the responsibility of the suppliers, and are thus covered by these Minimum Standards.

9.0 MONITORING OF EFFECTIVENESS

The Solo Group will continue to monitor the effectiveness of implemented strategies to identify risks of modern slavery and act on any incidences where modern slavery practices are detected within our operations or supply chains.

The solo Group will review its implemented Modern Slavery Management Plan annually and communicate when and as required to ensure compliance to the policy directive and the Australian Modern Slavery Act.

10.0 AUTHORISATION

This statement has been approved and endorsed by the Solo Group Board of Directors on the 1st of February 2025.

Robert Richards (Managing Director)



Gillian Richards (Director)



Rhys Richards (Director)

