



Modern Slavery Statement
2023

1. About this Statement

Acknowledgement of Country

Cleanaway acknowledges the Traditional Owners of the lands on which we operate and in the communities in which we exist.

We pay our respect to all Aboriginal and Torres Strait Islander peoples. We are proud to pay our respect to Elders past, present and future for they hold the traditions and the culture, and together we hold the hopes of a truly reconciled Australia.

As an Australian business generating annual consolidated revenue in excess of AU\$100 million, Cleanaway is required to publish annual Modern Slavery Statements, in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* ("**Modern Slavery Act**").

This joint Modern Slavery Statement ("**Statement**") is made by Cleanaway Waste Management Limited on behalf of the "reporting entities" within its corporate group (collectively referred to as "**Cleanaway**"); details of which are set out in **Section 1.1**. This Statement sets out the actions Cleanaway has taken to identify, assess and mitigate any actual or potential modern slavery risks in Cleanaway's operations and supply chain in the 12 months ended on 30 June 2023 ("**FY23**").



1.1. Reporting entities

This Statement is made by Cleanaway Waste Management Limited on behalf of the following reporting entities ("**the reporting entities**"):

- Cleanaway Co Pty Ltd
- Cleanaway Operations Pty Ltd
- Cleanaway Pty Ltd
- Cleanaway Solid Waste Pty Ltd
- Cleanaway Industrial Solutions Pty Ltd
- Landfill Operations Pty Ltd
- Cleanaway Daniels Services Pty Ltd
- Pilbara Environmental Services Pty Ltd

This Statement does not apply to our joint ventures given Cleanaway has no control over these entities from a shareholding or operational perspective.

1.2. Consultation

Cleanaway adopts a unified and comprehensive approach to managing all modern slavery risks amongst our reporting entities. Our Shared Governance Framework ensures a consistent methodology, guides our overall strategy for managing modern slavery risks and informs our reporting practices.

For instance, our centralised Cleanaway Legal, Sustainability, Procurement, Human Resources and Finance functions play a vital role in providing guidance and support to our reporting entities, to ensure compliance with our approach to assessing and addressing modern slavery risks, utilising all relevant legislation, adoption of procurement-related standards and providing training.

1.3. Key concepts

This Statement:

- addresses the criteria of the *Modern Slavery Act* as set out in the Appendix to this Statement. Unless otherwise stated, the information provided in each Section of this Statement applies to all reporting entities.
- uses the *Modern Slavery Act's* definition of modern slavery, which includes the following criteria: situations of serious exploitation, where coercion, threats or deception are used to exploit victims, including, amongst others, human trafficking, debt bondage, slavery, forced labour, deceptive recruiting for labour or services, and the worst forms of child labour. Modern slavery risk refers to the prospect of a practise involving modern slavery occurring in a business' operations and/ or supply chain.
- uses the terms "we", "us", "our", "ourselves" and "Cleanaway" to refer to Cleanaway Waste Management Limited and its controlled entities, including the reporting entities. These terms are used for convenience. They are not intended to convey how Cleanaway is structured, managed, or controlled from a legal perspective.

This Statement was approved on 16 October 2023 by the Board, and signed by the CEO, of Cleanaway Waste Management Limited on behalf of all reporting entities in accordance with section 14(2)(d)(ii) and (e)(ii) of the *Modern Slavery Act*.

We welcome your feedback at:
ModernSlavery@cleanaway.com.au

A message from our CEO

“Our people and their contributions are the key to our success. We work together as a team to do the right thing and act beyond today.”



I'm pleased to present Cleanaway's fourth Modern Slavery Statement, which sets out our continued commitment to assessing and addressing modern slavery risks in our supply chains as well as our own operations.

Cleanaway's mission towards making a sustainable future possible together extends to all stakeholders, including our employees, suppliers, customers, and the communities we serve.

Our vigilance in managing modern slavery risks reflects our commitment to upholding human rights, in alignment with the UN Guiding Principles. We are committed to ensuring that we respect human rights, prevent violations, and address any adverse impacts we encounter.

In FY23, we engaged a specialised firm to conduct a modern slavery gap analysis and review our forward-looking strategy, seeking opportunities to further strengthen our approach.

We've also bolstered our Compliance Framework by revising our Supplier Code of Conduct, reinforcing our dedication to respecting human rights.

I'm pleased to report that an independent assessment of ASX200 companies' FY22 Modern Slavery Statements found Cleanaway to be ranked above average in meeting the mandatory requirements of the *Modern Slavery Act 2018 (Cth)*.

While we celebrate our progress, Cleanaway's commitment to combating modern slavery remains ongoing. We also acknowledge that recommendations stemming from the independent statutory review of the Australian *Modern Slavery Act 2018 (Cth)* may prompt adjustments to our future approach.

Stay safe out there.

Mark Schubert
CEO and Managing Director
Cleanaway Waste Management Limited
 16 October 2023



Key actions in FY23



Conducting desktop audits of 150+ suppliers.



Developing a suite of tiered contract clauses with graduated obligations, tailored to the modern slavery risk of specific procurements.



Completing three in-person independent audits of higher-risk suppliers, including one international supplier.



Communicating with Owner Drivers and temporary labour regarding modern slavery and our compliance requirements.



Further strengthening our Supplier Code of Conduct to set out specific requirements in relation to modern slavery and broader labour rights issues, including a clear prohibition on the use of modern slavery.



Implementing new supplier information management software allowing us to capture modern slavery compliance information during new supplier onboarding processes.



Incorporating recommendations from the gap analysis into our forward looking Modern Slavery Work Plan.



Upskilling members of our Modern Slavery Working Group through further training and engagement with subject matter experts.

Section 2

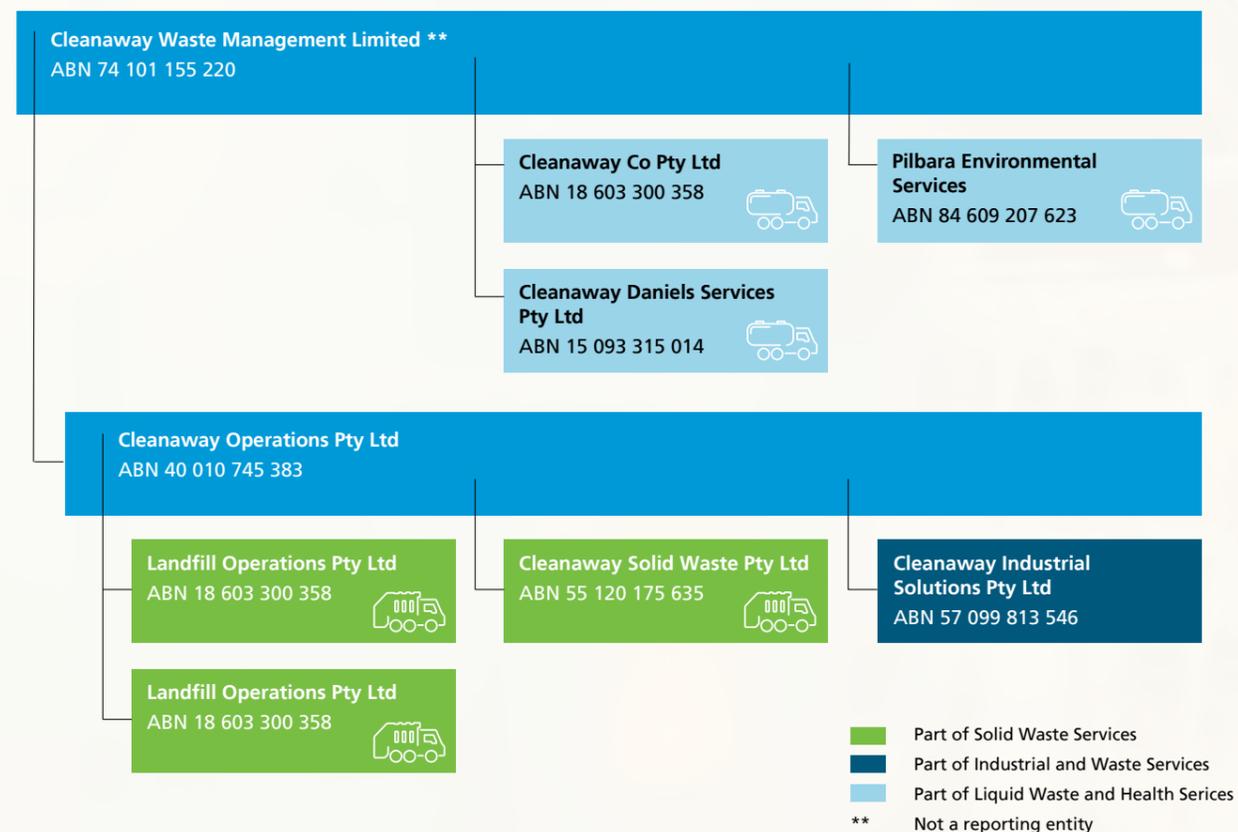
Our structure, operations and supply chain

2.1. Organisational structure

Cleanaway Waste Management Limited is a publicly listed company on the Australian Securities Exchange (ASX:CWY).

Cleanaway, including the reporting entities, is centrally managed from our Corporate Head Office, located at Level 4, 441 St Kilda Road, Melbourne. Activities undertaken by Cleanaway are outlined in Section 2.3 of this Statement.

Cleanaway comprises the following reporting entities:



2.2. Joint ventures

Cleanaway is party to a number of joint ventures that operate as separate entities. Cleanaway does not control any of the entities from a shareholding or operational perspective. Accordingly, this Statement does not cover the activities of any of these joint ventures, nor were they assessed as part of Cleanaway's operations or supply chain.

The major and trading joint ventures to which Cleanaway was a party during FY23 were as follows:

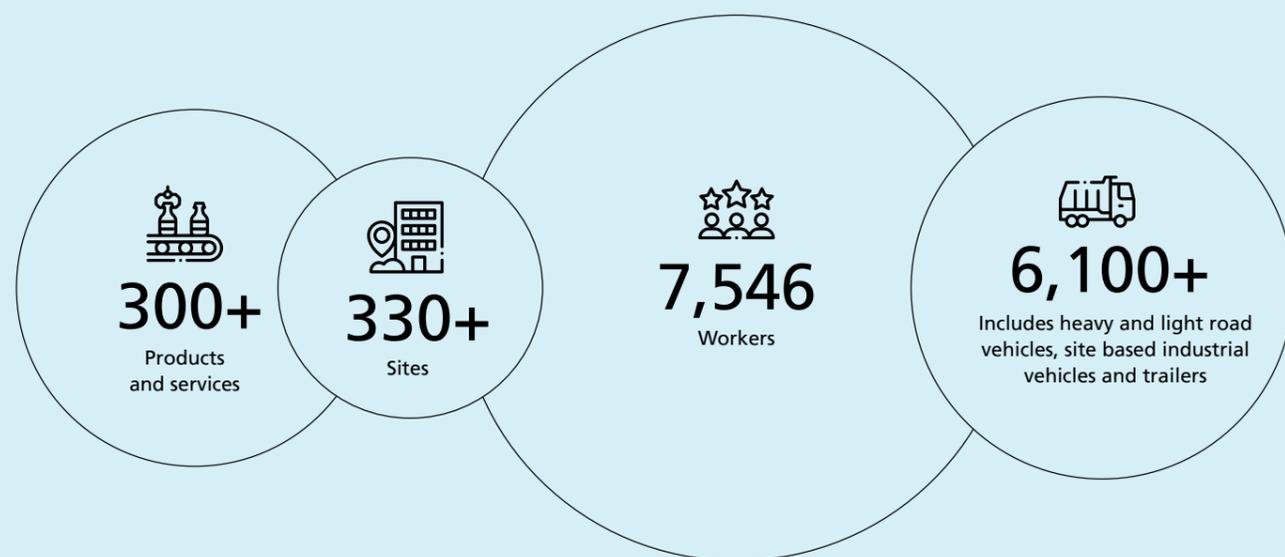
- The following is a "reporting entity" in its own right:
 - TOMRA Cleanaway Pty Ltd** – this is a 50/50 joint venture between Cleanaway and TOMRA Systems ASA, a Norwegian reverse vending manufacturer and supplier, which performs the role of the Network Operator under the NSW Return and Earn Container Deposit Scheme. TOMRA Cleanaway Pty Ltd has its own Modern Slavery Statement.
 - Entities that are not "reporting entities" under the *Modern Slavery Act* but have similar modern slavery risks, controls and mitigating actions to those faced by Cleanaway:
 - Circular Plastics Australia Holdings Pty Ltd (this is the parent company of CPA (PET) and CPA (PET) VIC)** – this is a joint venture between Cleanaway (who holds a minority interest), Pact Group Holdings Ltd, Asahi Beverages and Coca-Cola Europacific Partners where its facility in Albury/Wodonga, Victoria recycles used plastic containers onshore with ready end-market applications for the recycled PET material. This entity has its own Modern Slavery Statement. A second facility is currently under construction in Altona North.
 - Circular Plastics Australia Pty Ltd (which is the parent company of CPA (PE) Pty Ltd)** – this is a 50/50 joint venture between Cleanaway and Pact Group Holdings Ltd to build and operate a state of the art PE facility in Laverton, Victoria to process more than 20,000 tonnes of HDPE and PP plastic milk bottles, containers and food tubs. This facility is still under construction and has no revenue.
 - Cleanaway ResourceCo RRF Pty Ltd** – this is a joint venture with ResourceCo that operates a resource facility in Wetherill Park in NSW. We hold a minority interest in this joint venture. This is discussed further in ResourceCo's Modern Slavery Statement.

Cleanaway has binding contractual arrangements with each of the respective joint venture parties which includes a general requirement that all parties comply with laws.

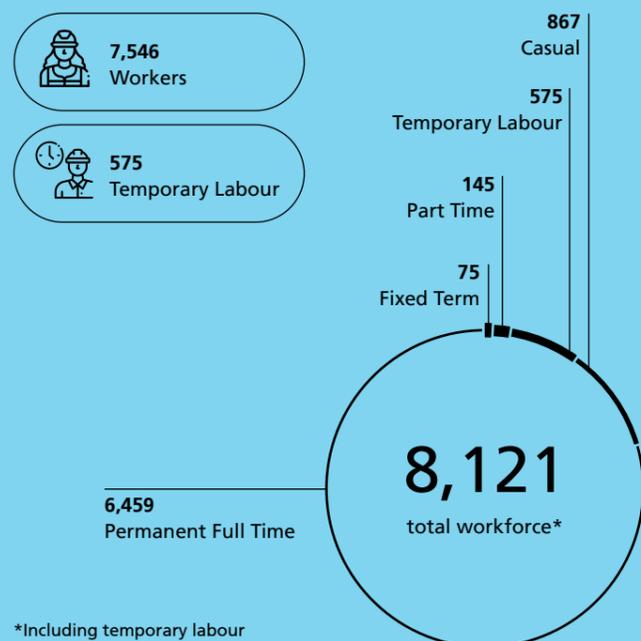


2.3. Our operations

Cleanaway is Australia's leading waste management, industrial and environmental services company, providing over 300 products and services across 330+ locations across the country. Our dedicated team of over 7,500 workers is supported by Australia's largest fleet of more than 6,100 waste, recycling and liquids collections vehicles.



Our workforce in FY23



*Including temporary labour

Our net revenue

\$2,965.8 million

as at 30 June 2023.

Our operations are divided nationally into the following three operating segments:

Solid Waste Services

Cleanaway collects solid waste from more than 100 municipal councils and 100,000 Commercial and Industrial customers across Australia. The services consist of both collection and post collection services (disposal and resource recovery).

Reporting entities:

- Cleanaway Operations Pty Ltd
- Cleanaway Solid Waste Pty Ltd
- Cleanaway Pty Ltd
- Landfill Operations Pty Ltd

Modern slavery risk:

- Direct labour**
Overseas recruitment
- Indirect labour**
- Waste collections, construction, logistics, temporary labour, facilities management, security**

Liquids, Hydrocarbons and Health Services

The Liquid Waste and Health Services segment generates revenue from collection, treatment, processing, refining, recycling and destruction of hazardous and non-hazardous liquids, hydrocarbons (i.e. used oil recycling), chemical waste, and hazardous waste.

Cleanaway's Health Services business also includes services for the safe treatment and disposal of health-related waste which includes sharps management, medical waste, pharmaceutical waste, healthcare hazardous waste and quarantine waste.

Reporting entities:

- Cleanaway Operations Pty Ltd
- Cleanaway Solid Waste Pty Ltd
- Cleanaway Pty Ltd
- Landfill Operations Pty Ltd
- Cleanaway Daniels Services Pty Ltd

Modern slavery risk:

- Indirect labour**
- Temporary labour**
- Waste collections, logistics, temporary labour, facilities management**

Industrial and Waste Services

Cleanaway's Industrial and Waste Services business provides a wide range of services including drain cleaning, non-destructive digging, vacuum loading, high pressure cleaning, pipeline maintenance, hydro-excavation, site remediation, CCTV and other technical services. These specialised services are supplied to over 2,000 customers in the Mining and Resources, Construction, Heavy Industry, Manufacturing and Civil Infrastructure sectors.

Reporting entities:

- Cleanaway Operations Pty Ltd
- Cleanaway Industrial Solutions Pty Ltd

Modern slavery risk:

- Direct labour**
Casual labour
- Temporary labour**
- Waste collections**
Temporary labour

2.4. Our supply chain

Our reputation depends not only on our own actions but also on those of our suppliers. We are continuing to work collaboratively with our value chain partners and suppliers to assess and address modern slavery risk.

The figures below represent the spend with our direct suppliers.

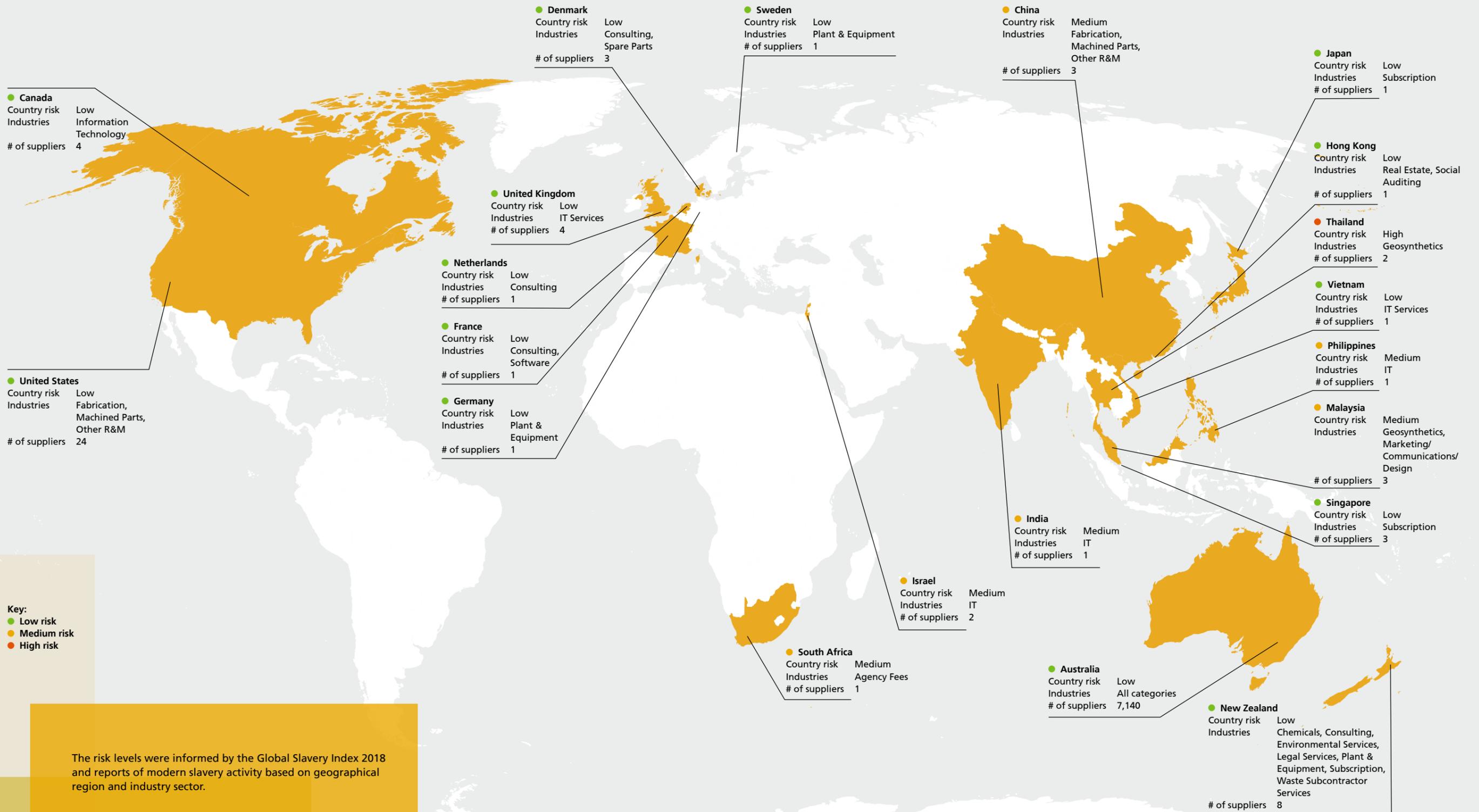
In FY23



We spent
\$1.8bn
with 7,300+ direct suppliers

We work with more than 7,300 suppliers directly, and we understand that there are many more indirect suppliers that are part of our extended supply chain, through the provision of goods or services to our direct suppliers.

We remain focused on addressing the risks of modern slavery in our direct supply chain, but also recognise that this risk can often sit within our indirect supply chains.



Key:
● Low risk
● Medium risk
● High risk

The risk levels were informed by the Global Slavery Index 2018 and reports of modern slavery activity based on geographical region and industry sector.



Procurement category spend

Our suppliers provide a diverse range of goods and services to help us deliver waste management, industrial, environmental and health services.

In line with our FY22 procurement profile, the majority of Cleanaway's spend is centralised through its procurement function. Spend outside this function is generally transactional in nature, such as fuel, equipment, and other site needs. Cleanaway's reporting entities and associated spend level with direct suppliers in each category is set out below*.

These supply categories are considered to be at higher risk of modern slavery as they are associated with employment of a higher percentage of workers from vulnerable populations. Complexities that exist within our labour supply chain, including where subcontracting arrangements are in place, limit the visibility Cleanaway holds over the final pay of persons involved.

Please refer to the table in Section 3 on page 13 for additional supply chain risks, including our indirect suppliers.

Supply category	Examples	Spend level**
 Waste collections	<ul style="list-style-type: none"> Landfill services Owner Drivers Recycling services Waste subcontractor services 	\$100M+
 Construction	<ul style="list-style-type: none"> Building construction Landfill cell construction Landfill Gas Infrastructure Construction 	\$100M+
 Logistics	<ul style="list-style-type: none"> Freight Ground Freight 	\$50M-\$100M
 Temporary labour	<ul style="list-style-type: none"> Temporary Labour 	\$50M-\$100M

Supply category	Examples	Spend level**
 Facilities Management and utilities	<ul style="list-style-type: none"> Facilities Management Services Fire Services Laundry Services Other Facilities Management Services 	\$10M-\$20M
 IT hardware	<ul style="list-style-type: none"> Computers IT Services Other IT Hardware Printers Telecom Hardware 	\$10M-\$20M
 Uniforms and workwear	<ul style="list-style-type: none"> Personal Protective Equipment Workwear 	>\$10M
 Security	<ul style="list-style-type: none"> Security Services 	>\$10M

* This spend excludes the following Cleanaway subsidiaries: Cleanaway Daniels, Global Renewables Holdings (GRL), Grasshopper, Vins Bins and ASP Plastics.
 † Spend level comprises addressable spend (i.e. the spend that Cleanaway can influence, and excludes expenses such as taxes and inter-company expenses).

Section 3

Risk of modern slavery in operations and supply chain

In FY23, we continued to focus our efforts on the modern slavery risks across our operations and supply chain, set out below:

Cleanaway is aware that modern slavery is an inherent risk in our operations and supply chain. In line with the UNGPs, we remain committed to respecting all internationally recognised human rights, including those set out in the UN Declaration on Human Rights, International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.



Facilities Management

Facilities management involves a variety of activities including cleaning, and may carry a higher risk due to a mix of factors, including: the industry's reliance on subcontracting arrangements, workers coming from vulnerable populations and the typical work hours taking place after-hours where there is little supervision.

Refer to page 22 for detail on our efforts to address modern slavery in this higher-risk category.



IT goods and/or services

At Cleanaway, we purchase finished goods from reputable suppliers, but we are aware that the components which comprise these finished goods, such as raw materials, may be sourced and/or manufactured in jurisdictions recognised as having higher risks of modern slavery.



Uniforms and Personal Protective Equipment (PPE)

The textile industry has been closely scrutinised for years due to the prevalence of high modern slavery risk factors, including the link between cotton from Xinjiang, the use of Uyghur labour, and high-risk business models and production regions (including Asia Pacific). In FY21, we engaged Sedex to undertake a Sedex Members Ethical Trade Audit (SMETA) of an indirect PPE and workwear supplier and we continue to closely monitor this category.



Logistics and transport

Cleanaway manages a significant portfolio of logistics suppliers who transport waste and other essential business commodities. We are also aware that logistics and transport are an important element of our indirect supply chain. Logistics and transport is an area of higher modern slavery risk because of the relative likelihood of business practices such as: forcing contracts by threat or duress, forcing an unsafe number of working hours, employing vulnerable populations, and non-payment for non-driving work (such as loading or waiting).



Indirect labour (including contractors, subcontractors, Owner Drivers and temporary labour)

There may be a higher inherent risk of modern slavery through indirect labour as it is often characterised by a higher portion of workers from vulnerable populations who may be less aware of their workplace rights and may be more susceptible to heightened subcontracting (and unauthorised subcontracting), and independent contracting. At Cleanaway, our direct categories of waste collections, construction, and security are all considered higher-risk for these reasons. We will continue to focus our efforts on Owner Drivers subcontracting of waste collection services.

We also engage a small number of contractors for skilled white-collar labour in higher-risk countries. This type of engagement carries different types of risks. The day-to-day work has fewer inherent health and safety risks and the workers tend to be highly educated. Working overseas may limit Cleanaway's visibility over their working conditions.



Direct labour

Cleanaway directly employs over 7,500 workers and these employees are recruited locally and internationally. Additionally, Cleanaway engages the services of an agency to recruit mechanics from South Africa and the Philippines to work in Australia on a visa for our Solid Waste Services business unit.

Those directly employed by Cleanaway are likely to have lower inherent risk of modern slavery as Cleanaway has direct control and visibility over their pay and working conditions. In addition, Cleanaway requires that a person holds Australian working rights to be employed.



Section 4

Actions taken to assess and address modern slavery risks

4.1. Governance and oversight structure

We have established a clear Governance Structure over the management of modern slavery risks across our operations and supply chain. Human right risks, including modern slavery, are considered within Cleanaway's broader Governance Framework.



Cleanaway Board

Responsible for the overall leadership, stewardship, strategic direction, governance, and performance of Cleanaway. It has the ultimate oversight of compliance with modern slavery laws for Cleanaway.



Sustainability Committee

A sub-committee established by the Board, the Sustainability Committee ensures that Cleanaway is meeting our legal and regulatory environmental obligations, in relation to modern slavery and is responsible for providing oversight of Cleanaway's modern slavery program. The Committee consists of three Non-Executive Directors, all of whom are determined to be independent by the Board.



Executive Team

Comprises the CEO, CFO, General Counsel & Company Secretary, Chief People Officer and Executive General Managers. Executive Team members are responsible for providing strategic leadership in all aspects of our operational and functional activities, including our actions to assess and address our modern slavery risks. The Executive Team is also responsible for approving and reviewing our Human Rights Policy.



Modern Slavery Working Group

Comprises three Executive Team leaders (Chief People Officer, General Counsel & Company Secretary, and CFO) and representatives from multiple functions including Human Resources, Employee Relations, Procurement, Legal, Sustainability and Finance, who meet monthly.

Formed in 2020, the Modern Slavery Working Group leads day-to-day implementation, oversight and monitoring of commitments to meet the *Modern Slavery Act* requirements on behalf of Cleanaway. Modern slavery risks, mitigation and management strategies are presented to our Executive Team by the Working Group for discussion and endorsement. This governance framework is also supported by our framework of documents and set out in **section 4.2**.

[Cleanaway Corporate Governance](#)

4.2. Our policy framework

Our policies and procedures play an important role in embedding respect for human rights throughout our business; establishing clear expectations of how we work and what we expect from those who work with or work for Cleanaway.

The core policies that assist us in respecting human rights and assessing and preventing modern slavery risks within our operations and supply chain include:

Code of Conduct

Defines how we do business and the standards of behaviour expected from those who work in or for our business. It emphasises our commitment to operating honestly, ethically, responsibly and with integrity.

Supplier Code of Conduct

Revised in FY23, this Code defines minimum requirements from our suppliers, including compliance with the *Modern Slavery Act*. Specifically, we communicate that all suppliers, not just those subject to the *Modern Slavery Act*, are to comply with Cleanaway's compliance standards.

Social Procurement Statement

Enables our vision for positive environmental, social and governance outcomes for our community through our supply chain, by focusing on modern slavery, social enterprises, First Nations businesses and environmentally sustainable initiatives.

Human Rights Policy

Our Human Rights Policy sets out our commitment to respect and support the human rights of all people, our employees, the communities where we operate, within our supply chain and those who may be impacted by our activities.

Anti-Bribery and Corruption Policy

Strictly prohibits those who work at or with Cleanaway from engaging in conduct that constitutes bribery or corruption, which may facilitate modern slavery.

Whistleblower Policy

Outlines how those working at or with Cleanaway, their associates or dependents, can raise concerns anonymously regarding any actual or suspected contravention of policies or applicable laws, including modern slavery. It sets out the mechanism to report to the independent third-party service, FairCall.

Other policies that contribute to our broader Governance Framework can be found here:

[Cleanaway Corporate Governance](#)

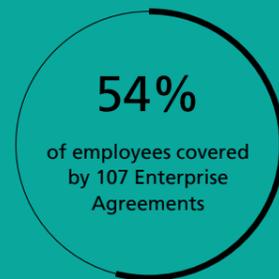
4.4. Assessing and addressing risk in our operations

Cleanaway’s direct labour force has been assessed as low risk. This classification is due to robust human resource controls in place for employee onboarding and regular reviews of wages and salary agreements, which assist in ensuring compliance with applicable legislation.

The compensation, benefits and entitlements received by Cleanaway employees meet or exceed Australian legislative requirements. We currently have 107 Enterprise Agreements in place covering 54% of our employees. Moreover, the policies we have implemented to address modern slavery and safeguard human rights, (as set out in Section 4.2 above), offer additional protections to our workers, fostering safe and equitable working environments.

Conversely, a higher-risk classification has been identified for Cleanaway’s indirect labour force. Whilst no accusations or cases of modern slavery breaches have been identified, Cleanaway recognise the vulnerable state of our indirect labour force and acknowledge potential associated risks.

Due to the size and nature of our business, our workforce composition can vary at different points in time, with many contract and labour hire workers being engaged. We are just as committed to valuing, protecting and honouring our agreements with our contractors as we are with our direct employees.



Risks identified in our operations:

Temporary labour

Cleanaway sources temporary labour during service demand peaks. Temporary labour can represent a comparatively higher modern slavery risk as:

- The roles sought are typically unskilled, attracting lower-skilled workers, migrants and other vulnerable populations.
- Seasonality of work limits job security.
- There is less visibility over worker end pay.

Owner Drivers and subcontractors

In order to operate efficiently, Cleanaway utilises subcontractors and Owner Drivers to carry out collection services primarily within our Solid Waste Services division. These individuals enter into a standard form contractual agreement with Cleanaway to perform these services.

Owner Drivers and collection subcontractors represent a higher modern slavery risk as:

- Owner Drivers may employ lower-skilled workers, who may be from vulnerable populations.
- Owner Drivers are paid to provide a service at a fixed price, rather than proportional to the hours they work.
- The Owner Driver may engage in subcontracting or unauthorised subcontracting of the services where Cleanaway has less visibility over worker end pay.

In addition, Cleanaway employs a limited number of contractors from overseas to provide specialised services. This includes IT personnel based in India and communication and design specialists located in Malaysia, Vietnam, and the Philippines. Whilst these professionals possess high levels of expertise, it is important to note

that the Global Slavery Index identifies these countries as having heightened risks of modern slavery, due to factors such as varying degrees of employment protection for workers, a relatively higher incidence of modern slavery and a large number of migrant workers.

In FY23, we undertook the following actions to address modern slavery risk in our operations:

Indirect labour

- Communicated with Owner Drivers and temporary labour regarding modern slavery and our compliance requirements.
- Developed tiered modern slavery clauses which can be tailored to the level of risk associated with a particular supplier or procurement.
- Enhanced the Responsible Business section of our external website to ensure information is accessible to our stakeholders.

Direct labour

- Upskilled members of our Modern Slavery Working Group through further training and engagement with specialist consultants.
- Delivered further training to all corporate employees which includes how to identify risks and report any concerns.
- Added a modern slavery awareness component to the Frontline Employee Induction Module.

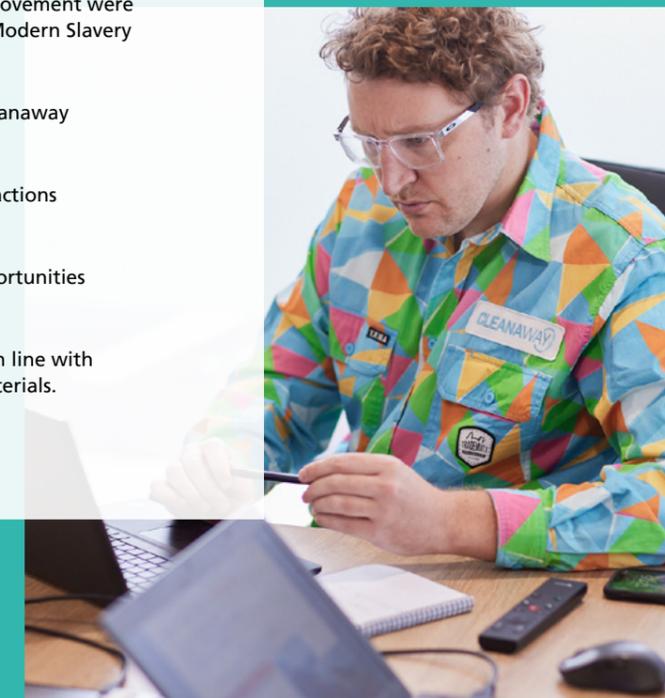
Enhancing our modern slavery risk management approach

Cleanaway engaged a specialist human rights firm to undertake a modern slavery gap analysis. The aim of this project was to identify opportunities to further enhance Cleanaway’s modern slavery risk management approach.

Key stakeholders across Cleanaway functions were engaged through targeted interviews and a high-level review of relevant documents and processes. Following this, gaps and opportunities for improvement were identified with recommendations incorporated into our Modern Slavery Work Plan for FY23 and beyond.

Our forward-looking Modern Slavery Work Plan helps Cleanaway to strengthen its modern slavery risk management by:

- Providing a detailed plan which allows for targeted actions to be implemented in a phased way;
- Aligning ‘effort with impact’ by focusing on key opportunities for action; and
- Addressing key stakeholder expectations for action in line with the UNGPs and Australian Government guidance materials.



4.5. Assessing and addressing risk in our supply chain

In FY23, we undertook the following assessment of modern slavery risk in our supply chain:

We categorised over 300 suppliers as either high, medium or low risk by industry, geography and spend. For suppliers rated low and medium, a survey was issued by an independent third-party to request data on the company's approach to managing Labour and Human Rights.

Survey responses were assessed and suppliers with a score of 44 or lower underwent an additional internal assessment to determine any further action required for FY24.



In FY23, we undertook the following actions to address the modern slavery risks identified in our supply chain:



Facilities management and cleaning services

- As part of our commitment made in FY22 to engage cleaning services directly (where possible), we undertook a deep dive into cleaning suppliers to better understand existing indirect supplier arrangements in place. Cleanaway continues working towards removing layers of subcontracting and implementing local and direct engagements across our facilities. The details of this can be found on page 22.
- Engaged an independent third-party to audit tier two indirect cleaning suppliers.

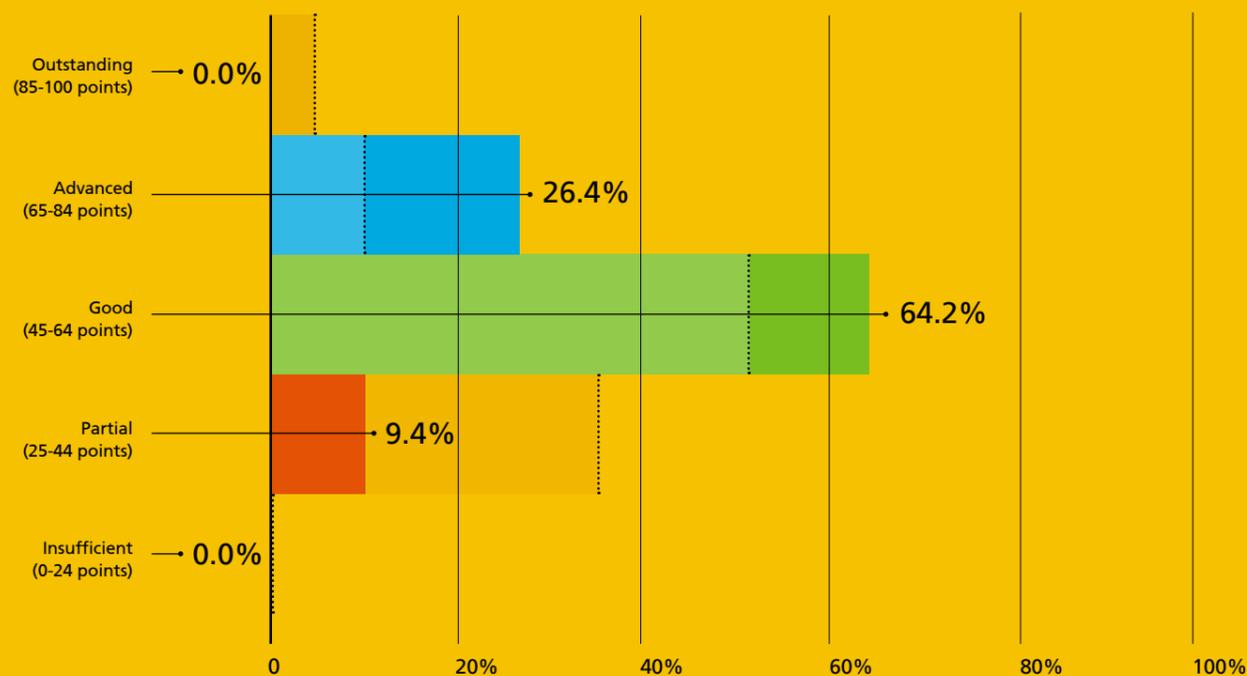


IT, goods or services

- An in-person Sedex SMETA audit was performed with a direct international supplier that provides marketing services to support Cleanaway internally. All workers interviewed were salaried and reported positive working conditions and relationships with management.

We are continuing to develop and utilise appropriate controls focusing on suppliers and industries we have the greatest influence over, which is often tied to spend. From there, we will then progressively expand these controls across a wider selection of our suppliers.

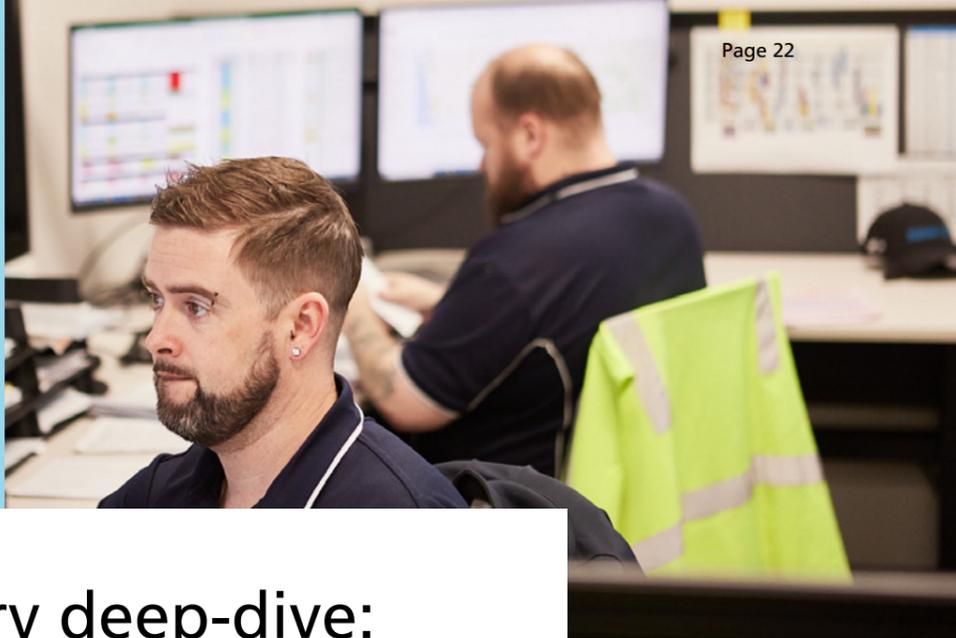
Supplier performance on the desktop audits indicated better than average performance.



Key achievements and actions in FY23 related to our supply chain include:

- Strengthening our Supplier Code of Conduct to set out specific requirements in relation to modern slavery and broader labour rights issues, including a clear prohibition on the use of modern slavery.
- Implementing a new supplier information management software that allows us to capture modern slavery compliance information during the onboarding process of new suppliers.
- Utilising a third-party predictive risk tool that anticipates our highest-risk suppliers based on industry factors.
- Participating in Modern Slavery roundtables with customers and industry peers to share learnings and gain insights.
- Undertaking a deep-dive to better understand our indirect contracted cleaners, considered a higher-risk category.





Category deep-dive: Facilities Management and Cleaning Services

In our FY22 Modern Slavery Statement, we committed to going beyond direct suppliers to better understand indirect arrangements and to engage cleaning suppliers directly, where possible.

In August FY23, Cleanaway transitioned from a contractual engagement with a national facilities management provider to having sites manage their own facilities directly, including cleaning services. One reason for this change was that our national provider relies heavily on subcontracting, particularly in remote regions. Having a decentralised approach allows for further local and direct engagements.

In November, we assessed the current cleaning service providers for 339 sites. Of these, 121 sites (36%), were not applicable as they either managed cleaning in-house, were not under our operational control, or were closed and/or inactive. Cleanaway's top three cleaning suppliers covered 88 sites (26%). The remaining 38%, were served by various suppliers, each responsible for only one or a few sites.

We gathered subcontracting data for our top three suppliers, all of which engage cleaning subcontractors. The third largest supplier contracts local sole proprietors, with whom they have established positive, long-term relationships. The second largest supplier subcontracts to a single cleaning company that manages multiple sites in the region. Lastly, the largest cleaning provider operates with a substantial and fragmented system of subcontractors, prompting us to conduct in-person audits.

To ensure compliance, we enlisted a third-party company to randomly audit two sites that receive subcontracted cleaning services from the largest provider. The audit aimed to verify that the employees were of legal age, compensated fairly, not coerced into working and operated in safe and healthy conditions.

Both audits found that our sites were fully compliant in terms of training and onboarding, remuneration, and employee workload. All workers interviewed expressed positive and safe working conditions and emphasised that they have always been paid on time and in full.

Refreshing our Supplier Code of Conduct

In FY23, we refreshed our Supplier Code of Conduct to set out specific requirements in relation to modern slavery and broader labour rights issues. We instilled a clear prohibition on the use of modern slavery and established a requirement for suppliers to take reasonable steps to ensure modern slavery is not occurring within their own supply chains.

Further updates include:

- Requiring suppliers to have reporting pathways in place to support the safe reporting of modern slavery and other concerns by workers and local communities without fear of retaliation.
- Highlighting the details for the whistleblowing mechanism as a grievance channel.
- Expanding content on wider environmental, social and governance considerations, including environmental protection.



We view our Supplier Code of Conduct as a key tool to communicate and manage potential modern slavery (and other human rights) risks relating to Cleanaway's supply chain. By setting out clear expectations for our suppliers in relation to issues such as modern slavery, this refreshed document will help to drive supplier action and provides a foundation for supplier engagement.

[Cleanaway Supplier Code of Conduct](#)



4.6. Grievance mechanisms

Cleanaway is dedicated to ensuring that all employees; both current and former, contractors and suppliers can report concerns anonymously, freely and without fear of reprisal or intimidation. Cleanaway is committed to treating complaints seriously, sensitively, and confidentially. The UNGPs outline the criteria for effective grievance mechanisms and Cleanaway is actively working to enhance our grievance mechanisms to comply with these criteria.

In addition to contacting a Cleanaway representative, current and former employees, suppliers, contractors and their workers and associates have the option to utilise our independent third-party service, FairCall. FairCall enables all individuals to raise concerns anonymously and confidentially, including those relating to modern slavery. FairCall offers multiple language options and can be accessed via phone, email or fax.

All new employees receive training in relation to the Whistleblower Policy through Cleanaway's online training platform. Reminders of the independent FairCall service and the protections under the Whistleblower Policy are provided to employees regularly.

No disclosures regarding labour rights or modern slavery were reported to FairCall during FY23.

Whilst FairCall should not replace an effective grievance mechanism, information on the platform is widely available throughout Cleanaway and all potential modern slavery or broader human rights concerns or allegations received via the hotline are investigated appropriately.

It is important Cleanaway's workers (including in acquired entities) are aware of Cleanaway's grievance mechanisms so that they are able to safely report modern slavery or broader labour rights related concerns. In FY24, we will take steps to ensure our workers, including contractors and suppliers are aware of our approach to managing modern slavery risk, including the grievance mechanisms available to them, and is accessible to all workers, including 'frontline' workers at regional sites and across Cleanaway entities.



4.7 Remediation process

Cleanaway recognises the UNGPs require businesses to address and collaborate on rectifying identified human rights violations, including modern slavery, that they may have caused or contributed to.

In the event that instances of modern slavery are identified in Cleanaway's supply chain or operations, Cleanaway, led by the Modern Slavery Working Group, will conduct an investigation into the identified risks in order to gain an understanding of whether Cleanaway has caused or contributed to the identified modern slavery harm. Cleanaway understands that investigating modern slavery incidents or allegations can be complex and context specific. Any such investigation findings will be reported upwards through the governance structure outlined in **section 4.1** and inform our approach to remediation.

The Modern Slavery Working Group will make its recommendations for remediation on a case-by-case basis. If we identify that we have caused, or contributed to modern slavery, Cleanaway will endeavour to remediate or cooperate in the remediation of the harm, in line with the UNGPs. This may include putting in place an agreed framework to mitigate any such involvement in any future instances of modern slavery.

In situations where Cleanaway is not satisfied with the response from a supplier in relation to managing modern slavery risks, we will generally seek to work with the supplier to undertake the actions we deem necessary to address and mitigate the risk. In some situations, we may choose to remove the supplier from our supply chain and terminate their engagement with us.

Remediation Steps

We receive a modern slavery grievance or identify a potential modern slavery issue, through:

- Our FairCall service
- Cleanaway's organisational structure
- Active monitoring

This is escalated to our Executive Team and Modern Slavery Working Group.

We undertake an initial assessment to determine whether an internal or external investigation is appropriate, and establish the appropriate communication procedure.

Where required, we or a third party undertakes an investigation to verify the modern slavery grievance or modern slavery issue.

Cleanaway has developed a set of key principles to guide its investigative response, including:

- Adopting a 'do no harm' approach.
- Setting out key investigative steps, such as whether and how we would engage with suppliers, unions, NGOs and other stakeholders and the process for involving law enforcement.
- Outlining the process for escalating a modern slavery incident or allegation internally.

We remediate, monitor, report and learn, and we:

- Take immediate steps to correct the victim's situation tailored to their circumstances, and monitor their progress
- Report the findings to key stakeholders and as required by law
- Work with the perpetrator to remediate and resolve the issue or remove them from our business or supply chain
- Assess the effectiveness of the procedure to ensure continuous improvement.

Section 5

Assessing the effectiveness of our actions

We acknowledge that measuring effectiveness of our actions to assess and address modern slavery risks is challenging and takes time to develop.

Cleanaway will continue to mature its modern slavery risk management framework and assess its effectiveness by:

- Regularly evaluating our own processes and procedures against best industry practice and peer companies.
- Embedding a continuous improvement process through monitoring of suppliers participating in the third-party supplier survey, to help us track, assess and evaluate our risks on an ongoing basis.
- Regularly reviewing relevant governance documents, processes and procedures to help ensure they remain fit for purpose.
- Continuing to use our cross-functional Modern Slavery Working Group to monitor the progress of our actions and drive improvements to our processes to address identified gaps and opportunities.
- Tracking our work to extend and enhance our modern slavery training across Cleanaway, including the reporting entities. This will help us identify remaining knowledge gaps and help ensure our training content is fit for purpose.
- Analysing any modern slavery related complaints or grievances received through the third-party service FairCall and Cleanaway's Whistleblower Policy mechanism or other channels to help identify any trends and possible gaps in our controls.
- Further details on our priorities for FY24 are found in **Section 6**.



Section 6

Priorities for FY24

We are committed to continuously improving our response to modern slavery as we continue to learn and understand our modern slavery risks.

We have set the following as our key priorities in FY24:

Area	Planned action
Policies and governance	<ul style="list-style-type: none"> Communicate revised Supplier Code of Conduct across Cleanaway entities.
Assessing risk	<ul style="list-style-type: none"> Further strengthening procurement onboarding processes and reviewing non-central procurement processes.
Managing risk	<ul style="list-style-type: none"> Deliver scenario-based training for the Modern Slavery Working Group. Undertake targeted capacity building with key suppliers.
Remediation	<ul style="list-style-type: none"> Increase visibility of grievance mechanisms available at Cleanaway. Work with labour hire companies to ensure workers are being provided with information around workplace rights and reporting concerns.
Tracking effectiveness	<ul style="list-style-type: none"> Develop a framework to track and measure effectiveness of our approach to managing modern slavery.



Appendix

Modern Slavery Act reporting criteria

The table below sets out the mandatory reporting requirements in the *Modern Slavery Act* and where each has been addressed within this Statement:

Modern Slavery Act mandatory reporting criterion	Reference in this Statement
1. Identify the reporting entity.	Section 1 Page 3
2. Describe the reporting entity's structure, operations and supply chain.	Section 2 Pages 6-12
3. Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls.	Section 2.2. 2.3, 2.4, 3 Pages 7-15
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address risks, including due diligence and remediation processes.	Section 4 Page 16
5. Describe how the reporting entity assesses the effectiveness of such actions.	Section 5 Page 26
6. Describe the process of consultation with any entities the reporting entity owns or controls and, for a reporting entity covered by a joint statement, the entity giving the statement.	Section 1.2 Page 3
7. Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Section 6 Page 28