



# DELIVERING OUR AMBITION

*together*



Modern Slavery Statement 2025

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Cleanaway acknowledges the Traditional Owners of the lands on which we operate and in the communities in which we live and work. We pay our respect to all Aboriginal and Torres Strait Islander people and to their Elders past and present, for they hold the traditions and the culture, and together, we hold the hopes of a truly reconciled Australia.



## A message from our CEO

*At Cleanaway, our purpose is to create a sustainable future together. Supporting this purpose are our Guiding Principles, which serve as a roadmap for fostering a workplace where everyone feels safe and respected. With this in mind, we are committed to addressing risks of modern slavery within our business and supply chain.*

This is Cleanaway's Modern Slavery Statement for the year ended 30 June 2025, outlining the progress we have made in identifying modern slavery risks across our operations and supply chains, as well as the actions taken to mitigate those risks.

Over the past 12 months, we have continued investigating our supply chain for signs of modern slavery through desktop and onsite audits, utilising our Informed 365 platform for supplier engagement and due diligence.

Modern slavery demands our constant vigilance, and we are committed to eliminating it from our operations and supply chains.

We adopt a 'beyond compliance' stance in managing modern slavery risks and are pleased with our progress.

Following the independent statutory review of the Modern Slavery Act in 2023 and noting the ongoing work led by the Attorney General in this area, Cleanaway's Modern Slavery Working Group will continue to monitor developments and adjust our approach accordingly. Our focus remains on strengthening our systems to prevent violations and mitigate adverse impacts.

**Mark Schubert**  
Chief Executive Officer  
and Managing Director

## HIGHLIGHTS FROM FY25

*Our work to eliminate modern slavery includes:*

- Launched Respect 2.0 @Cleanaway Program to build on the successful launch of Respect@Cleanaway to further embed a safe, inclusive and values-driven culture.
- Desktop audits of over 150 suppliers assessed as a higher risk, via an independent third party.
- Two in-person independent audits of four major logistics suppliers.
- In-person audits of a major personal protective equipment supplier and a major office product supplier.

# OVERVIEW

## About this Statement

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 year ended 30 June 2025 ("FY25").

## 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
- Waste Management Pacific (SA) Pty Ltd

This Statement does not apply to our joint ventures given that Cleanaway does not control these entities from a shareholding or operational perspective.

This Statement was approved on 12 December 2025 by the Cleanaway Board at the December Board meeting, 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](mailto:ModernSlavery@cleanaway.com.au)

## 1.2 Consultation

Cleanaway adopts a unified and comprehensive approach to managing all modern slavery risks amongst our reporting entities. Our 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:

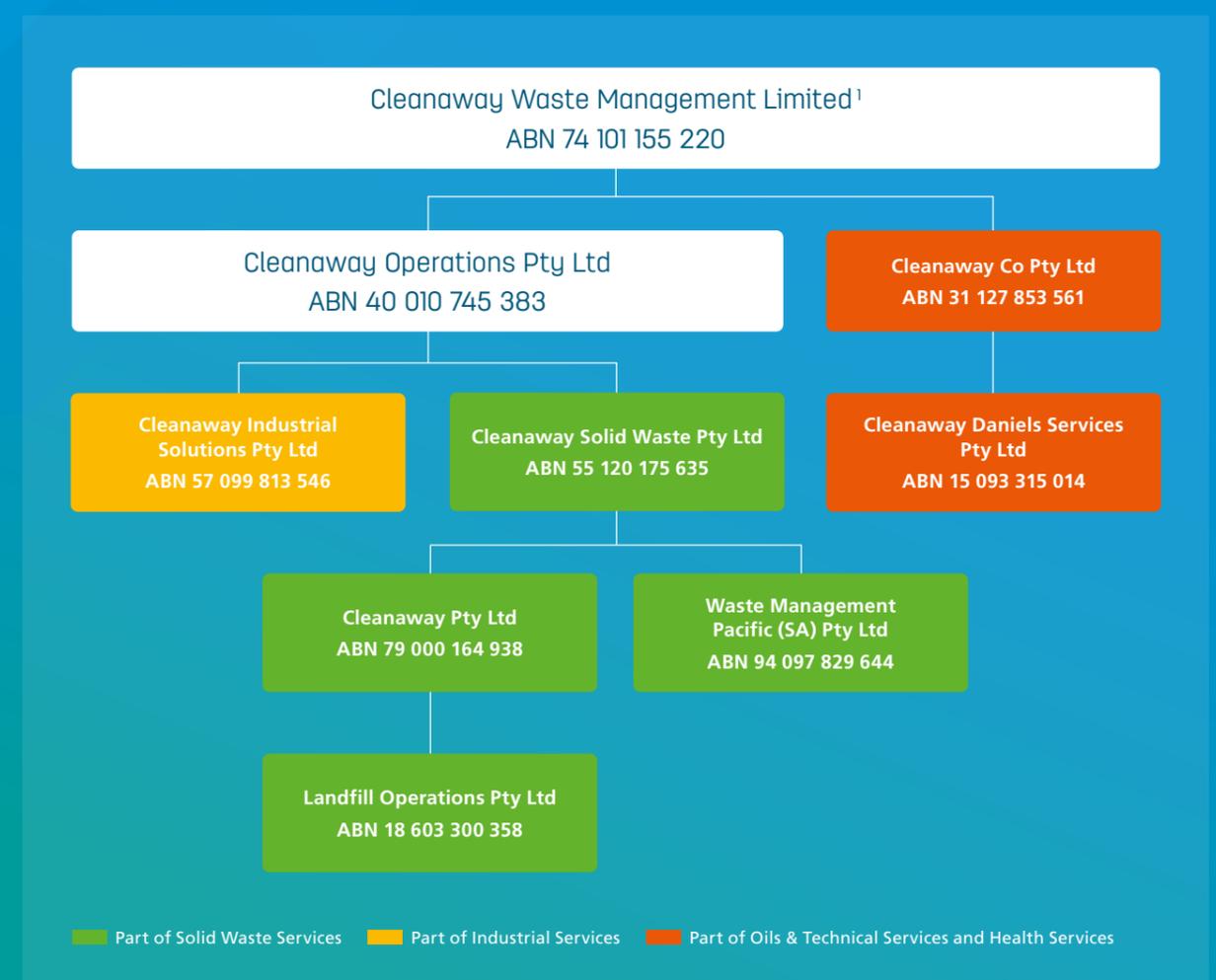
- Addresses the criteria of the Modern Slavery Act as set out in the Appendix to this Statement. Unless otherwise stated, the information provided in each Section of this Statement applies to all reporting entities.
- Uses the Modern Slavery Act's definition of modern slavery, which includes the following 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.

# 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.



<sup>1</sup> Not a reporting entity.

## SECTION 2

### 2.2 Joint ventures

Cleanaway is party to a number of joint ventures that operate as separate entities. Unless otherwise stated, 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 FY25 were as follows:

- a) **TOMRA Cleanaway joint venture** is a 50/50 joint venture with TOMRA Systems ASA, a Norwegian reverse vending manufacturer and supplier, to operate the container deposit schemes in Victoria, New South Wales and Tasmania. These joint ventures have their own Modern Slavery Statements.
- b) **Circular Plastics Australia (PET) Holdings Pty Ltd** is a joint venture between Cleanaway (who holds a minority interest), Pact Group Holdings Ltd, Asahi Beverages and Coca-Cola Europacific Partners where its facilities in Albury, New South Wales and Altona North, Victoria recycle used plastic containers onshore with ready end-market applications for the recycled PET material back into beverage containers. This entity has its own Modern Slavery Statement.
- c) **Circular Plastics Australia (PE) Pty Ltd** is a 50/50 joint venture between Cleanaway and Pact Group Holdings Ltd that is operating a state of the art recycling facility in Laverton, Victoria processing HDPE and PP plastic milk bottles, containers and food tubs into food grade and non-food grade recycled HDPE and PP resin. This entity has its own Modern Slavery Statement.
- d) **Pilbara Environmental Services Pty Ltd** is a 50/50 joint venture between Cleanaway and Kingkira Group delivering regional and remote heavy industrial cleaning, waste management and environmental support services. While Cleanaway controls this entity for accounting purposes, it does not meet the statutory definition of a 'reporting entity' for the purposes of the Modern Slavery Act.
- e) **Lucas Heights Bioenergy Pty Ltd** is a 50/50 joint venture with LMS Energy Pty Ltd, an Australian bioenergy and methane abatement company, to process and monetise landfill gas at Cleanaway's Lucas Heights landfill. This entity does not meet the statutory definition of a 'reporting entity' for the purposes of the Modern Slavery Act.
- f) **Wonthaggi Recyclers Pty Ltd** is a 50/50 joint venture between Cleanaway and Wonthaggi Recyclers Pty Ltd, a local waste collection contractor for the Bass Coast Shire Council. This entity does not meet the statutory definition of a 'reporting entity' for the purposes of the Modern Slavery Act.

### 2.3 Our operations

Cleanaway is Australia's leading waste management, industrial and environmental services company, providing products and services across 350+ locations across the country. With the acquisition of Contract Resources and Citywide Waste completed in July 2025, our dedicated team of over 10,000 workers is supported by Australia's largest fleet of more than 6,400 waste, recycling and liquids collection vehicles.



#### OUR WORKFORCE<sup>1</sup>



#### OUR NET REVENUE

**\$3,302.7m**  
FOR THE YEAR ENDED 30 JUNE 2025

<sup>1</sup> Cleanaway workforce as at 30 June 2025, prior to the completion of Contract Resources and Citywide Waste in July 2025.  
<sup>2</sup> Total workforce includes temporary workforce.

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



#### Solid Waste Services

Cleanaway collects solid waste from more than 120 municipal councils and 115,000 Commercial and Industrial customers across Australia. The services consist of both collection and post-collection services (disposal and resource recovery).

#### Reporting entities:

- Cleanaway Pty Ltd
- Cleanaway Co Pty Ltd
- Cleanaway Operations Pty Ltd
- Cleanaway Solid Waste Pty Ltd
- Landfill Operations Pty Ltd
- Waste Management Pacific (SA) Pty Ltd

#### Modern slavery risk:

- Direct labour
- Temporary labour
- Overseas recruitment
- Indirect labour
- Waste collections
- Construction
- Logistics
- Facilities management
- Security



#### Oils & Technical Services and Health Services

Oils & Technical Services 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 Co Pty Ltd
- Cleanaway Operations Pty Ltd
- Cleanaway Daniels Services Pty Ltd

#### Modern slavery risk:

- Direct labour
- Temporary labour
- Waste collections
- Construction
- Logistics
- Facilities management



#### Industrial Services

Cleanaway's Industrial Services business provides a wide range of services including vacuum loading, high pressure cleaning, non-destructive digging, site remediation, pipeline maintenance, drain cleaning, and other technical services. These specialised services are supplied to over 2,000 customers in the Oil and Gas, Resources and Infrastructure sectors.

#### Reporting entities:

- Cleanaway Co Pty Ltd
- Cleanaway Operations Pty Ltd
- Cleanaway Industrial Solutions Pty Ltd

#### Modern slavery risk:

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

SECTION 2



**FY25 spend and suppliers:**

**\$2.9B<sup>1</sup>**  
Total spend

**\$1.8B<sup>2</sup>**  
Addressable spend

**9,514**  
Total suppliers

**9,221**  
Number of suppliers in the centralised spend category with operations based in Australia

**99%**  
of spend was with businesses based in Australia

**1%**  
of spend was with business based overseas

# 2.4 Our supply chain

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

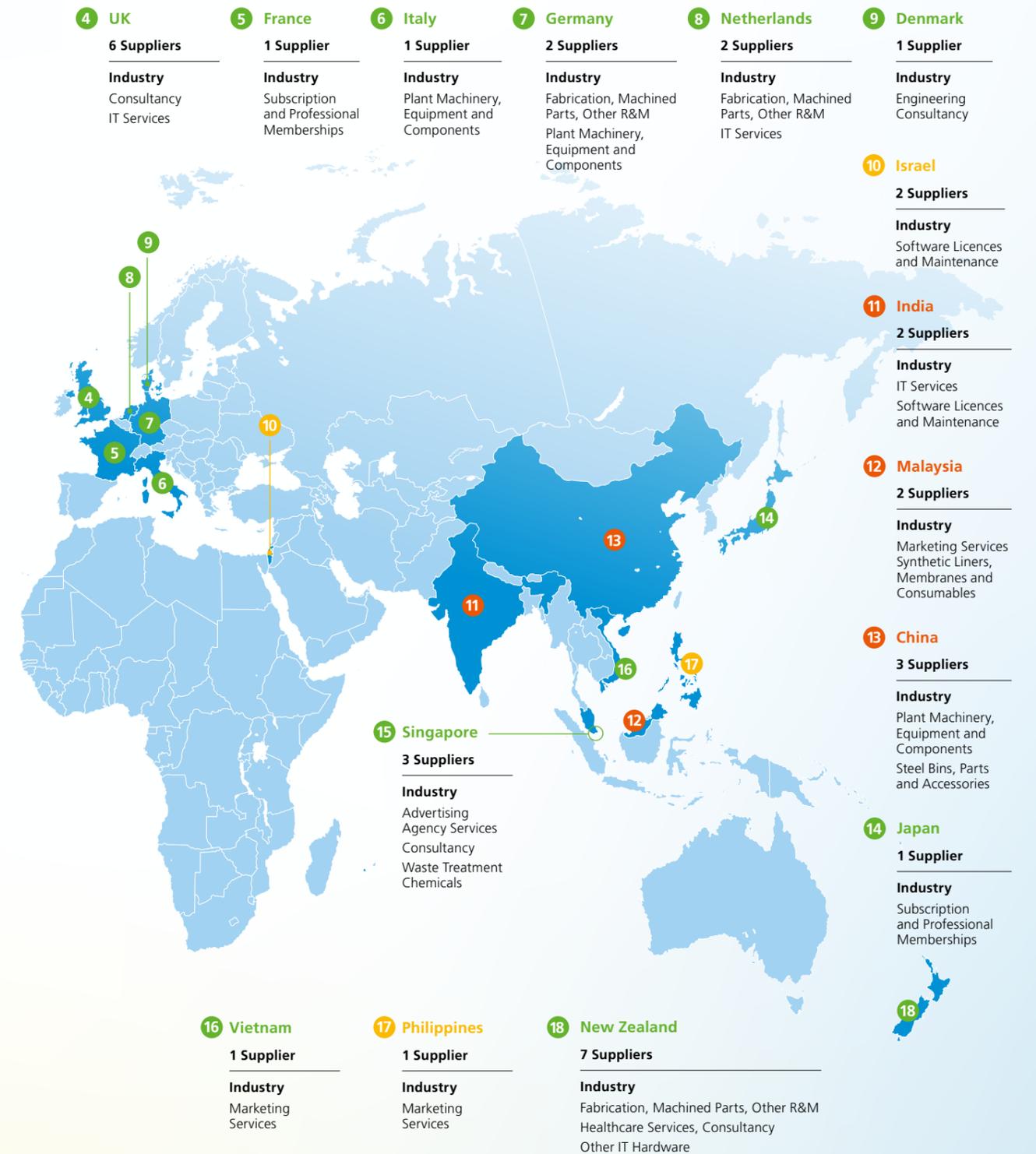
KEY ● Low risk ● Medium risk ● High risk



1 The total spend excludes the reporting entity Cleanaway Daniels Services Pty Ltd, as well as ASP Plastics and joint ventures since these are not reporting entities.  
2 Addressable spend is spend that Cleanaway can influence and excludes expenses such as taxes.

Our reputation depends on the actions of our suppliers as well as our own. Those suppliers include the more than 9,000 companies we work with directly but also an extended supply chain that includes those that they receive goods and services from.

We collaborate with our value chain partners and suppliers to address modern slavery risk but also recognise that there are risks in our indirect supply chains. The figures below represent the spend with our direct suppliers. However, we understand that many more indirect suppliers are part of our extended supply chain by providing goods or services to our direct suppliers. We remain focused on addressing the risks of modern slavery in our direct supply chain, but we also recognise that this risk can often sit within our indirect supply chains, and we have a lot more work to do to have a better understanding of this risk.





## SECTION 2

### Procurement category spend

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

Our central procurement team manages Cleanaway's material and high risk expenditure. Any spending that this team doesn't oversee is generally transactional, such as facilities maintenance, equipment, and other site needs. The spending of Cleanaway's reporting entities with direct suppliers in each category is set out below.

These supply categories have a higher risk of modern slavery as they are associated with employing a higher percentage of workers from vulnerable populations. Complexities within our labour supply chain, including where subcontracting arrangements are in place, limit Cleanaway's visibility over pay and working conditions of persons involved.



# \$100m+

#### WASTE COLLECTION

Examples: Owner Drivers  
Subcontractor Collection



# \$100m+

#### CONSTRUCTION

Examples: Civil Construction Materials, Landfill Construction Soils and Clays, Synthetic Liners, Membranes and Consumables, Building Construction, Civil Construction (Non-Cell/Capping), Landfill Cell Construction, Landfill Gas Infrastructure Construction



# \$100m+

#### LOGISTICS

Examples: Ground Freight



# \$100m+

#### TEMPORARY LABOUR

Examples: Temporary Labour



# \$50-\$100m

#### FACILITIES MANAGEMENT AND UTILITIES

Examples: Facilities Management Services, Fire Services, General Site Services, Office Furniture, Electricity, Natural Gas, Utilities, Water



# >\$15m

#### IT HARDWARE

Examples: Computers, Other IT Hardware, Printers



# >\$10m

#### UNIFORMS AND WORKWEAR

Examples: Laundry Services, PPE, Workwear



# >\$10m

#### SECURITY

Examples: Security Services

## SECTION 3

# RISK OF MODERN SLAVERY IN OPERATIONS AND SUPPLY CHAIN

Modern slavery is an inherent risk in our operations and supply chain, but we remain committed to human rights, as set out in the United Nations Declaration on Human Rights, the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

We have identified risks in the following areas in our operations and supply chain:

#### Facilities management

Facilities management involves a variety of activities, including cleaning, and may carry a higher risk due to factors such as the industry's reliance on subcontracting arrangements, workers from vulnerable populations, and after-hours work with little supervision.

#### Uniforms and personal protective equipment (PPE)

The textile industry has a range of risk factors, such as linkages between the various inputs into the supply chain. For example, the workwear supply chain might include Xinjiang cotton, Uyghur labour use, and high-risk business models and production regions.

#### IT goods and services

We purchase finished goods from reputable suppliers, but know that raw materials and components of the finished goods may be sourced and manufactured in jurisdictions with higher risks of modern slavery.

#### Logistics and transport

Cleanaway directly manages a large portfolio of logistics suppliers who transport waste and other essential business commodities. Logistics and transport are also an important element of our indirect supply chain. There is a relatively high 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

Indirect labour is often characterised by a higher number of workers from vulnerable populations who may be less aware of their workplace rights and more susceptible to unauthorised subcontracting and independent contracting. For these reasons, our waste collection, construction and security are all assessed as being a higher risk.

Cleanaway also engages a small number of contractors for skilled white-collar labour in higher-risk countries, which carries different risks: workers tend to be highly educated and day-to-day work has fewer inherent health and safety risks. Working overseas may limit Cleanaway's visibility over their working conditions.

#### Direct labour

Cleanaway directly employs over 7,900 workers as at 30 June 2025, and 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. Cleanaway has direct control and visibility over the pay and working conditions for those it directly employs. 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 governance structure for managing modern slavery risks across our operations and supply chain. Human rights 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, the Board has ultimate oversight of Cleanaway's compliance with modern slavery laws.



### Sustainability Committee

A subcommittee established by the Board, the Sustainability Committee provides oversight of Cleanaway's modern slavery program and ensures that Cleanaway meets its legal and regulatory environmental obligations. The committee consists of three non-executive directors.



### Executive Team

The executive team comprises the Chief Executive Officer and Managing Director, Chief Financial Officer, General Counsel and Company Secretary, Chief People Officer, Executive General Manager of Solid Waste Services, Executive General Manager of Environmental and Technical Solutions, Executive General Manager of Customer and Growth, Executive General Manager of Health, Safety and Environment, Executive General Manager of Strategy, Mergers and Acquisition, Executive General Manager of Energy from Waste, Major Projects and Corporate Affairs and Executive General Manager of Commercial.

Members provide strategic leadership on operational and functional activities, including our actions to assess and manage our modern slavery risks. The executive team also approves our human rights policy.



### Modern Slavery Working Group

The working group is a cross-functional team focused on managing Cleanaway's modern slavery risk. It comprises representatives from human resources, employee relations, procurement, legal, sustainability, investor relations, and finance, collectively working to identify, address and prevent exploitation, forced labour, and human trafficking across our operations and supply chain.

This governance framework is also supported by our policy framework, set out in [Section 4.2](#).

- [Click here for more information on Cleanaway's governance structure.](#)
- [Visit our website for more information on Cleanaway's corporate governance.](#)

## 4.2 Our policy framework

Our policies and procedures establish clear expectations for how we work and what we expect from those who work with or work for Cleanaway.

Policies on human rights and assessing and preventing modern slavery risks within our operations and supply chain include:

### Code of conduct

The code 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

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, must comply with Cleanaway's compliance standards.

### Social procurement statement

The statement sets out 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

This 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

This policy outlines how those working at or with Cleanaway, their associates or dependents, can raise concerns anonymously about 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.

### Purchase order terms and conditions

Each supplier contracted by our purchase order terms and conditions must comply with all modern slavery legislation, ensure that their representatives and suppliers must confirm that they do not engage in modern slavery, promptly provide requested information to Cleanaway for compliance verification, and notify Cleanaway immediately in writing if they become aware of any breaches or instances of modern slavery related to their supply chain or operations.

- [Visit our website for more information on Cleanaway's policies and procedures.](#)



## SECTION 4

### 4.3 Assessing and addressing risk in our operations

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

The compensation, benefits and entitlements Cleanaway's employees receive meet or exceed Australian legislative requirements. As of 30 June 2025, we have 121 Enterprise Agreements covering around 65% of our employees. Our policies to address modern slavery and safeguard human rights, set out in [Section 4.2](#), protect our workers further by fostering safe and equitable working environments.

Internal programs, including Respect 2.0@Cleanaway, also support employees alongside whistleblower and grievance mechanisms, as set out in [Section 5](#).

Cleanaway's indirect labour force has been assessed as a higher risk. While no modern slavery risks have been made or cases of modern slavery uncovered, Cleanaway recognises our indirect labour force is vulnerable.

The size and nature of our business means our workforce composition can vary over time as contract and labour hire workers are engaged. We are just as committed to protecting our contractors and honouring our agreements with them as we are with our direct employees.



#### Identified risks in our operations:

##### ➤ Temporary labour

Cleanaway sources temporary labour during service demand peaks. This brings with it a higher risk of modern slavery as:

- Roles typically have a lower barrier to entry, attracting lower-skilled workers, migrants and other vulnerable populations.
- The seasonal nature of the work means limited job security.
- There is less visibility over what workers are paid.

##### ➤ Owner drivers and subcontractors

Cleanaway engages subcontractors and owner drivers for its collection services, primarily in our Solid Waste Services division. These workers enter a standard contractual agreement with Cleanaway to perform these services.

Owner drivers and collection subcontractors are at a higher risk of modern slavery as they:

- May employ lower-skilled workers from vulnerable populations.
- Provide a service at a fixed price rather than according to the hours they work.
- May engage in subcontracting or unauthorised subcontracting of services giving Cleanaway less visibility over what workers are paid.

##### ➤ International recruitment

Cleanaway employs a limited number of overseas contractors to provide specialised services. This primarily includes IT services in India, and communication and design specialists in Malaysia, Vietnam and the Philippines. These professionals have high levels of expertise, which brings lower risk. However, the Global Slavery Index identifies these countries as having heightened risks of modern slavery as:

- There may be varying degrees of employment protection for workers.
- There may be a relatively higher incidence of modern slavery.
- There may be a large number of migrants and other vulnerable populations.

#### In FY25, we undertook the following actions to address modern slavery risk in our operations:

##### ➤ Indirect labour

- Further strengthened our governance and risk management by continuing to implement contracts that require modern slavery compliance in our owner-driver agreements, purchase order standard terms and conditions, and master services agreements.
- Attached Supplier Code of Conduct to our onboarding system, requiring all new suppliers to acknowledge that they have read and understood their obligations, and our expectations regarding modern slavery compliance.

##### ➤ Direct labour

- Revised onboarding and induction processes to include critical elements of our modern slavery/human rights policy and objectives.
- Continued to utilise our Guiding Principles to strengthen our culture that fosters growth, innovation and inclusivity and encourages safety, internal collaboration and proactive, customer-focused approaches.
- Introduced our Respect 2.0@Cleanaway Program to further embed a safe, inclusive, respectful culture at Cleanaway and comply with legislation. The program draws a clear line against abuse, harassment, discrimination and disrespectful conduct.

## SECTION 4

### 4.4 Assessing and addressing risk in our supply chain

Our FY25 procurement spend and risk profile remained consistent with previous years. Approximately 99% of our direct spend is with businesses based in Australia, as set out in Section 2. We continue enhancing our risk management approach, utilising technology, and working with our customers and suppliers.

In FY25, we took the following action to assess modern slavery risk in our supply chain:



#### Supplier risk management

Using supplier information management software, Cleanaway continues to reassess and refine supplier categorisations of high, medium or low risk by industry, geography and spend.

We prioritise audits for suppliers where we have high procurement spend.

For suppliers rated as a low and medium risk, we issue a due diligence survey to request data on the company's approach to managing labour and human rights. Survey responses are assessed, and suppliers who do not meet our standards are assessed further to determine what action, if any, should be taken.



#### Supplier due diligence platform – Informed 365

Cleanaway collaborated with technology provider, Informed 365, and the Property Council of Australia to assess and manage modern slavery risks in its supply chains.

Using Informed 365's platform to collect information on suppliers, members of the council are able to assess, compare, track year-on-year progress and report on their supply chain networks more easily. The platform ensures consistency across the industry, streamlines reporting, and reduces administration. It also makes it easier for suppliers to share information with organisations they choose.

Informed 365 also holds monthly meetings where members can discuss opportunities, risks and emerging trends, receive updates on educational resources, reports and toolkits, events and briefings, and hear from guest speakers about sustainable procurement, supply chains, human rights and modern slavery.

This collaboration supports continuous improvement, sharing skills and knowledge, and increasing leverage and access to best practice examples.



#### Independent ethical sourcing review of logistics suppliers

Having previously focused our reviews on offshore suppliers, we identified our Australian logistics suppliers as the next priority, given the sector's recognised modern slavery risk profile – particularly the use of vulnerable migrant and labour-hire workers and the documented history of underpayment and working-rights breaches in parts of the Australian logistics and road transport industry.

During the reporting period, we undertook an ethical sourcing audit of our logistics suppliers in Victoria and South Australia in parallel to two state-wide tender processes. In each process, all shortlisted suppliers were audited by an independent third party, which reviewed documentation and policies relating to modern slavery and assessed performance against key risk criteria, including working hours compliance, working eligibility compliance, visa condition monitoring, labour law compliance, labour freedom, worker welfare, and wage compliance. Findings from these audits were shared with each supplier, with improvement actions agreed where required, and the implementation of those actions tracked and monitored to completion. No high-risk modern slavery indicators were identified in any of the suppliers assessed.

### 4.5 Grievance mechanisms

Cleanaway follows the United Nations' Guiding Principles on grievance mechanisms and is working to make sure they are effective.

Cleanaway is committed to treating complaints seriously, sensitively and confidentially. All current and former employees, contractors and suppliers can report concerns anonymously, freely and without fear of reprisal or intimidation.

As well as contacting a Cleanaway representative, a person reporting a concern can use FairCall, our independent third-party service. Using FairCall, individuals can raise their concerns anonymously and confidentially, including those relating to modern slavery. FairCall offers multiple language options and can be accessed by phone, email or fax.

Our employees receive training on Cleanaway's whistleblower policy. All employees are reminded regularly of the FairCall service and their protections under the whistleblower policy.

FairCall is not intended to replace a grievance mechanism, however all potential modern slavery or broader human rights concerns or allegations received through the hotline are investigated.

No disclosures regarding labour rights or modern slavery were reported to FairCall or the Speak Up Program during FY25.



## SECTION 4

### 4.6 Remediation process

United Nations' Guiding Principles require businesses to address and collaborate on rectifying identified human rights violations, including modern slavery, that they may have caused or contributed to.

If such a violation occurs, our Modern Slavery Working Group will investigate to determine whether Cleanaway has caused or contributed to the identified modern slavery harm. Investigating modern slavery incidents or allegations can be complex and context-specific. Findings will be reported through the governance structure outlined in [Section 4.1](#).

The Modern Slavery Working Group will make its recommendations for remediation on a case-by-case basis. If the group concludes that we have caused or contributed to modern slavery, Cleanaway

will endeavour to remediate or cooperate in the remediation of the harm, in a way consistent with the United Nations' Guiding Principles. This may include agreeing to a framework to mitigate the risk of a violation happening again.

If we are not satisfied with a supplier's response to a violation, we will generally seek to work with them to mitigate the risk. In some situations, we may remove the supplier from our supply chain and terminate our engagement with them.

#### Remediation steps:



#### Step 1

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.



#### Step 2

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



#### Step 3

Where required, we or a third party undertake 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.



#### Step 4

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

Measuring how effective our actions are on modern slavery is challenging. We continue to improve our modern slavery risk management framework by:

- Regularly evaluating our processes and procedures against best industry practice and peer companies.
- Monitoring suppliers participating in the third-party supplier survey, to help us track, assess and evaluate our risks on an ongoing basis.
- Conducting annual independent in-person audits of selected higher-risk suppliers in our business.
- Regularly reviewing governance, processes and procedures to ensure they are fit for purpose.

- Using our cross-functional Modern Slavery Working Group to monitor our actions and drive improvements to our processes, to address gaps and opportunities.
- Extending our modern slavery training across Cleanaway, including to reporting entities, addressing knowledge gaps, and making sure our training content is fit for purpose.
- Analysing modern slavery related complaints or grievances received through FairCall, our whistleblower mechanism, or other channels, to identify trends and gaps in our controls.

Further details on our priorities for FY26 are found in [Section 6](#).





## SECTION 6

# PRIORITIES FOR FY26

*On 31 July, Cleanaway completed the acquisition of Contract Resources, a market-leading provider of production-critical services to Tier 1 Oil & Gas customers, known for supporting safe and reliable energy operations. Contract Resources primarily operates across Australia, New Zealand and the Middle East.*

### In FY26, we will prioritise the following actions:

- Assess and integrate Contract Resources' (CR) modern slavery risk management practices to ensure the overall Cleanaway framework remains effective and robust.
- To reflect the Company's increased overseas presence, Cleanaway will review its existing modern slavery risk frameworks and controls for overseas operations within both the existing Company and the recently acquired CR, and as appropriate, will implement the stronger of the two approaches.
- Continue to explore opportunities to engage with our customers and peers in similar sectors.
- Working towards developing a formal framework to track the effectiveness of Cleanaway's modern slavery risk management.
- Engage with labour hire firms to provide workers with information about workplace rights and reporting concerns.
- Continuously improve our understanding of our supply chain, to the extent possible, beyond the relationship with our direct suppliers.
- Execute the annual audit program based on a snapshot of suppliers by risk category and undertake a deep dive on higher-risk categories.
- Provide ongoing training for employees to recognise and respond to potential instances of modern slavery.

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