

FY20 Modern Slavery Statement



CLEANAWAY
Making a sustainable future possible

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Table of contents

How we're making a sustainable future possible	4
Aligning to the UN's Sustainable Development Goals	5
Modern Slavery Statement	6
Introduction	7
What is modern slavery	7
Position statement	7
Our organisational structure	7
Our business	8
Our approach	9
Impact of COVID-19	11
Our plans for FY21	11



Our Vision

Cleanaway is a market leader, delivering integrated total waste management solutions.

We leverage Our Cleanaway Way to consistently deliver on our promise to customers.

We are an employer of choice, generating superior value and sustainable solutions for our customers, investors, community and the planet.

How we're making a sustainable future possible

Best in class management of our people, markets and assets leads to consistent financial results while ensuring we remain true to our mission of making a sustainable future possible.

Building on strong foundations:

PEOPLE

Focusing on the safety and wellbeing of our people, our customers and the communities in which we operate and a workplace that values diversity, equality and inclusion.

MARKETS

Working in partnership with our customers to improve service and achieve their sustainability goals.

ASSETS

Minimising our environmental impact through the responsible management of our assets as well as exploring and investing in new technologies.



To deliver enduring results:

FINANCIALS

Managing risks and creating value for all our stakeholders through a focus on sustainable financial performance to deliver financial returns for our investors, and the strength to continue to invest in new infrastructure and technologies to deliver on Our Mission.

EARTH

By continuing to invest in our Footprint 2025, investing in the infrastructure, technology and innovation to close the loop and contribute to a viable circular economy in Australia, we will help to change the landscape of recycling and residual waste management in Australia.

Aligning to the UN's Sustainable Development Goals

In September 2020, Cleanaway released our FY20 Sustainability Report, which is aligned to the UN's Sustainable Development Goals (SDGs) and details how we create long-term value towards our mission of making a sustainable future possible. We identified the SDGs that we can have the greatest impact on and identified nine priority SDGs on which to focus our efforts.

Cleanaway's Modern Slavery Statement is directly relevant to our priority SDG 8 - Decent Work and Economic Growth and SDG 5 – Gender Equality.

5 GENDER EQUALITY



SDG 5.2

Eliminate all forms of violence against all women and girls in public and private spheres, including trafficking and sexual and other types of exploitation

8 DECENT WORK AND ECONOMIC GROWTH



SDG 8.7

Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms



To read more about how we're delivering a sustainable future for all Australians, view our Sustainability Report at cleanaway.com.au/sustainability-report



FY20 Modern Slavery Statement

This joint modern slavery statement covers the activities of Cleanaway Waste Management Limited and the other “reporting entities” within its corporate group (details of which are set out in Section 4 of the FY20 Modern Slavery Statement below) (collectively referred to as “Cleanaway”) during our financial year ended 30 June 2020 (“FY20”), to identify and mitigate any potential modern slavery risks in Cleanaway’s operations and supply chain.

1 - Introduction

Cleanaway is Australia's leading total waste management, industrial and environmental services company. Our team of more than 6,000 highly trained staff are supported by a fleet of over 5,000 specialist vehicles working from approximately 250 locations across Australia. With the largest waste, recycling and liquids collections fleets on the road – and supported by a network of recycling facilities, transfer stations, engineered landfills, liquid treatment plants and refineries – we are working hard to deliver on our mission of making a sustainable future possible for all our stakeholders.

As an Australian business generating annual consolidated revenue in excess of AU\$100 million, we acknowledge that 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 is Cleanaway's first Modern Slavery Statement, which we have prepared in relation to FY20 (**FY20 Modern Slavery Statement**).

2 - What is modern slavery?

In this FY20 Modern Slavery Statement, the following terms have the following meanings:

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

3 - Position statement

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

4 - Our organisational structure

Cleanaway Waste Management Limited is an Australian company, which is publicly listed on the Australian Securities Exchange (ASX: CWY). Cleanaway Waste Management Limited is the parent company of a large corporate group of controlled entities. All controlled entities within Cleanaway's corporate group (including the "reporting entities" referred to in the table below) are centrally managed from Cleanaway's corporate head office, located at Level 4, 441 St Kilda Road, Melbourne.

This FY20 Modern Slavery Statement represents a joint modern slavery statement, which has been prepared and published on behalf of the following "reporting entities" (as that term is defined in section 5 of the Modern Slavery Act 2018 (Cth)) within Cleanaway's corporate group:

Name of reporting entity	Australian Company Number
Cleanaway Waste Management Limited	101 155 220
Cleanaway Pty Ltd	000 164 938
Cleanaway Solid Waste Pty Ltd	120 175 635
Landfill Operations Pty Ltd	603 300 358
Cleanaway Industrial Solutions Pty Ltd	099 813 546
Cleanaway Operations Pty Ltd	010 745 383
Cleanaway Co Pty Ltd	127 853 561

5 - Our business

5.1 Operations

Cleanaway's operations are divided into the following three (3) operating segments:

1. **Solid Waste Services** – Cleanaway operates the largest solid waste and recycling services fleet in Australia, supported by a network of market-leading resource recovery and post collection facilities across the country. We service more than 95 municipal councils and over 135,000 local businesses;
2. **Liquids and Health Services** – Cleanaway has the largest hydrocarbons recycling business in Australia and is a leader in the overall liquid waste market, collecting and processing 140 million litres of mineral oil, as well as collecting and processing 680 million litres of hazardous and non-hazardous liquids. Cleanaway Daniels handles all healthcare generated waste streams, with an unrivalled national service infrastructure and best in class products and services; and
3. **Industrial Services** – Cleanaway offers a wide range of plant and asset management services, providing solutions to reduce production down time, the risk of unscheduled plant stoppages and reliance on labour, increase plant efficiency, and help customers comply with strict environmental and OH&S requirements.

For further information about Cleanaway's operations, please refer to Cleanaway's website www.cleanaway.com.au.

5.2 Supply chain

Cleanaway's Management focussed on the following key categories of third-party expenditure as part of the Risk Assessment (defined in Section 6.1 of this FY20 Modern Slavery Statement below) conducted during FY20:

Category	Details
Fleet, plant & equipment	A large proportion of Cleanaway's annual procurement expenditure relates to the purchase of fleet, plant & equipment from various third-party providers.
Temporary labour hire workers	Due to peaks and troughs in demand for our services, we periodically enlist temporary workers from labour hire service providers, to manage circumstances in which demand for our services outstrips our internal employment resources.
External specialist services	Consistent with standard commercial practice, Cleanaway procures services from external specialist service providers, in circumstances where Cleanaway does not have the capacity or expertise to perform those services internally.
Personal protective equipment	A small minority of Cleanaway's annual procurement expenditure (i.e. less than 1.00% for FY20) relates to the purchase of personal protective equipment (PPE).

6 - Our approach

6.1 Overview

In preparation for compliance with the Modern Slavery Act (including publication of this FY20 Modern Slavery Statement), during FY20, Cleanaway's Management established a multi-disciplinary working group to:

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

Further details of the potential **modern slavery risks** which we identified as part of the Risk Assessment and the Actions which we took to mitigate those **modern slavery risks** are outlined in Sections 6.2 (Risk Assessment) and 6.3 (Actions) of this FY20 Modern Slavery Statement below.

6.2 Risk Assessment: potential modern slavery risks

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

Area of business	Modern slavery risk	Description of modern slavery risk
Operations	Commodity risks	That recyclable commodities which Cleanaway procures as part of the services performed by its Solid Waste Services operating segment are sold to buyers who (either themselves or indirectly through others) engage in any practices which might be considered to constitute modern slavery .
Operations & Supply chain	Workforce risks	<p>That any person in Cleanaway's workforce, comprising both Cleanaway employees and temporary labour hire workers, is subject to any conditions which might be considered to constitute modern slavery.</p> <p>In particular, the Risk Assessment concluded that Cleanaway's sourcing of temporary workers represented a comparatively higher modern slavery risk, given that Cleanaway does not have visibility over the precise terms on which such temporary workers are engaged by their respective labour hire service provider employers.</p>
Supply chain	Supply chain risks	<p>That there are modern slavery risks in the operations and/or supply chains of Cleanaway's various:</p> <ul style="list-style-type: none"> • suppliers of fleet, plant & equipment – the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, due to the technical nature of these goods and the strong reputations of our suppliers; • specialist service providers – the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, given that Cleanaway's various service providers are well-reputed professionals in their respective fields and are physically located in Australia; and • suppliers of PPE – the Risk Assessment concluded that these procurement activities presented a comparatively higher modern slavery risk, due to the nature of the relevant goods (i.e. textiles) and the jurisdictions in which they are produced (i.e. Asia Pacific).

6.3 Actions: mitigation of potential modern slavery risks

During FY20, Cleanaway took the following Actions to mitigate the potential **modern slavery risks** which we identified as part of the Risk Assessment (see Section 6.2 above):

Area of business	Modern slavery risk	Action(s) taken to mitigate modern slavery risk
Operations	Commodity risks	<p data-bbox="438 324 1404 392">During FY20, Cleanaway's Management took the following Actions to mitigate the "Commodity risks" referred to in Section 6.2 above:</p> <ul data-bbox="438 403 1444 918" style="list-style-type: none"> <li data-bbox="438 403 1444 571">• Desktop due diligence – Cleanaway's Management conducted detailed desktop due diligence into Cleanaway's material buyers of its recyclable commodities (Material Buyers). Amongst other things, this desktop due diligence considered the particular modern slavery risks which are posed by each of those individual buyers of recyclable commodities, having regard to (amongst other things) the jurisdictions in which they operate; <li data-bbox="438 582 1444 772">• Contractual protections – Cleanaway's Management incorporated new "Terms & Conditions of Sale" into Cleanaway's precedent "Order Confirmation" sales contract, which buyers of Cleanaway's recyclable commodities (including the Material Buyers) are required to sign pursuant to a purchase of Cleanaway's recyclable commodities, agreeing to (amongst other things) ensure that no recyclable commodities are processed at any site which engages in any activity which may be considered to constitute modern slavery; and <li data-bbox="438 784 1444 918">• Modern Slavery Questionnaire – Cleanaway's Management prepared a detailed "Modern Slavery Questionnaire", which was distributed to all Material Buyers of Cleanaway's recyclable commodities, enquiring about each of the Material Buyers' processes for ensuring that there are no modern slavery risks in their respective operations and supply chains.
Operations & Supply chain	Workforce risks	<p data-bbox="438 952 1404 1019">During FY20, Cleanaway's Management took the following Actions to mitigate the "Workforce risks" referred to in Section 6.2 above:</p> <ul data-bbox="438 1030 1444 1332" style="list-style-type: none"> <li data-bbox="438 1030 1444 1164">• Employees (i.e. Operations) – Cleanaway's Management conducted due diligence into Cleanaway's employment practices and contracts with its employees, in an effort to ensure that Cleanaway's employees are not subject to any conditions which might be considered to constitute modern slavery; and <li data-bbox="438 1176 1444 1332">• Temporary labour hire (i.e. Supply chain) – Cleanaway's Management took the Actions outlined below in relation to "Supply chain risks". In particular, Cleanaway's Management distributed a new due diligence questionnaire to all existing labour hire services providers, enquiring about (amongst other things) the labour hire service providers' processes for ensuring that there are no modern slavery risks in each of their respective operations and supply chains.
Supply chain	Supply chain risks	<p data-bbox="438 1366 1404 1456">During FY20, Cleanaway's management took the following Actions to mitigate the "Supply chain risks" (as well as the "Workforce risks" in relation to the sourcing of temporary labour hire workers) referred to in Section 6.2 above:</p> <ul data-bbox="438 1467 1444 2049" style="list-style-type: none"> <li data-bbox="438 1467 1444 1646">• Supplier Code of Conduct – Cleanaway's Management prepared and published a new "Supplier Code of Conduct", which potential suppliers are required to acknowledge whilst tendering to provide goods and/or services to Cleanaway. Amongst other things, suppliers are requested to acknowledge Cleanaway's expectation that our suppliers must avoid any practices which might be considered to constitute modern slavery; <li data-bbox="438 1657 1444 1747">• Contractual protections – Cleanaway's Management included new contractual protections in Cleanaway's precedent supply agreements, requiring Cleanaway's suppliers to comply with Australian and international modern slavery legislation; and <li data-bbox="438 1758 1444 2049">• Due diligence questionnaire – Cleanaway's Management prepared a new due diligence questionnaire, enquiring about (amongst other things) Cleanaway's suppliers' processes for ensuring that there are no modern slavery risks in each of their respective operations and supply chains. This due diligence questionnaire has been: <ul data-bbox="478 1904 1444 2049" style="list-style-type: none"> <li data-bbox="478 1904 1133 1937">i. in use for new tenders conducted since 1 January 2020; and <li data-bbox="478 1948 1444 2049">ii. (further to the two comparatively higher modern slavery risks referred to in Section 6.2 above) separately distributed to Cleanaway's existing labour hire services providers and suppliers of PPE, for completion in relation to each of their respective operations and supply chains.

6.4 Effectiveness of Actions

As at the date of this FY20 Modern Slavery Statement, we have not yet identified any material incidents of modern slavery occurring in our operations and/or supply chain and are therefore satisfied with the adequacy of the Actions which we took during FY20, to mitigate the potential **modern slavery risks** which were identified as part of the Risk Assessment.

7 - Impact of COVID-19

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

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

As at the date of this FY20 Modern Slavery Statement, we are not aware of the COVID-19 pandemic having caused any additional **modern slavery risks** in our operations and/or supply chain.

8 - Our plans for FY21

During FY21, we plan to:

1. continue strengthening our efforts in relation to the identification (and mitigation) of potential **modern slavery risks**, prioritising our activities based on:
 - i. the identification (and mitigation) of any new **modern slavery risks** which arise in our operations and/or supply chain; and
 - ii. any inadequacies which we identify in relation to the ability for our existing Actions to appropriately mitigate the potential **modern slavery risks** which we have identified (and will, in the future, identify) in relation to our operations and/or supply chain; and
2. further explore (and, if necessary, take additional Actions to further mitigate) the “Workforce risks” referred to in Section 6.2 above.



VIK BANSAL
CEO AND MANAGING DIRECTOR

This FY20 Modern Slavery Statement has been approved by the Board of Directors of Cleanaway Waste Management Limited on behalf of all “reporting entities” in Cleanaway’s corporate group (details of which are set out in Section 4 of the FY20 Modern Slavery Statement above).



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