



Monza Hold Co Pty Ltd

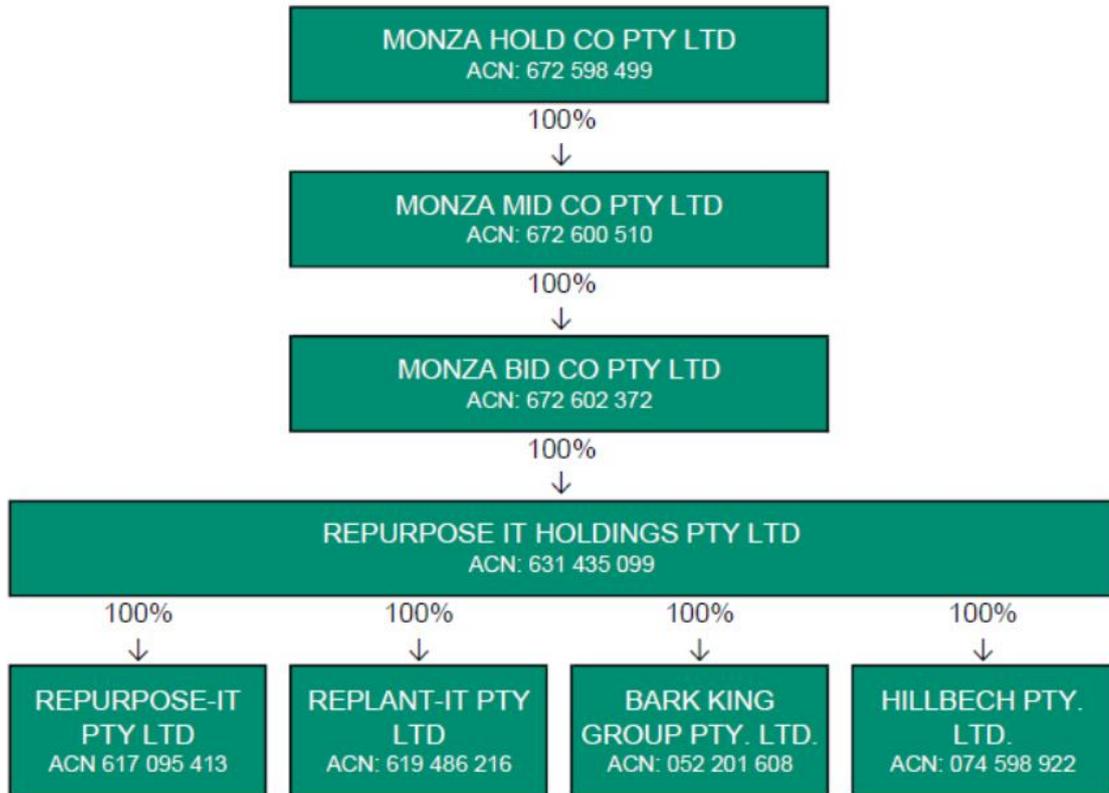
Modern Slavery Statement FY2025

1 Introduction

- 1.1 Repurpose It is a Victorian resource recovery business, built on the basis that all waste can be converted into a valuable resource. This Modern Slavery Statement is our first statement prepared in compliance with the *Modern Slavery Act 2018* (Cth) (**Act**). Although it is our first year of reporting, we have grown to learn more about modern slavery over the years with the increase in survey requests and engagement from our customers on the subject matter. As per the second pillar in the UN Guiding Principles on Business and Human Rights (UNGPs), we recognise the important role that businesses play in mitigating and remediating adverse human rights impacts, including modern slavery. In accordance with the Act, this statement covers our financial year ending 30 June 2025 and provides an overview of our structure, operations and supply chain, the risks of modern slavery in our business and the steps we have taken to assess and address those risks.
- 1.2 Under the Act, the term “modern slavery” describes situations where coercion, threats, or deceit are used to exploit individuals, depriving them of their human right to freedom. The gravity of the exploitation means that it goes beyond inadequate working conditions or underpayment of wages. Modern slavery is an umbrella term to encompass practices such as human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment, and the worst forms of child labour.
- 1.3 When we refer to the “risks” of modern slavery, our focus is on the risk of harm to people, as opposed to the risk of harm to our business. The focus on people is at the core of our values:
- **Care & Protect** – enriching the lives of our people, communities and customers
 - **Future Focused** – daring to be different, we will advance Australia’s transition to a circular economy.
 - **Integrity** – ethical resource recovery doing it right today so we can all enjoy tomorrow.
 - **Sustainability** – preserving resources to deliver a sustainable future.
- 1.4 This statement also articulates how we plan to mature our approach to due diligence, as we prepare for future reporting years, and the key performance indicators to measure the effectiveness of our actions.

2 Our structure and operations

- 2.1 The reporting entity is Monza Hold Co Pty Ltd (ABN 23 672 598 499) as the holding company of its wholly owned subsidiaries as shown in the chart below. References in this statement to “we”, “us” or “our” refers to the reporting entity and its subsidiaries, unless stated otherwise.



- 2.2 Repurpose It's mission is to make premium quality repurposed materials with a view to eliminating waste and pollution through closed loop resource recovery. We believe that closed loop waste systems are essential if we are to preserve our resources for the next generations.
- 2.3 Collaborating with social enterprises like the Brotherhood of St Lawrence, Unison Property Corporation and Outlook Environmental Services keeps us firmly grounded and reminds us of our current and future obligations.
- 2.4 Repurpose It recovers resources and gives them a new life as construction or landscaping materials via:
- (1) construction and demolition projects waste;
 - (2) excavating and drilling waste;
 - (3) road and rail construction and maintenance waste;
 - (4) infrastructure projects such as bridges and drainage waste;
 - (5) local councils providing access to recyclables such as glass, road sweepings and drainage waste;
 - (6) food and organic waste from all sectors including households.

We use four primary treatment processes.

 <p>Sorting</p> <p>Waste is grouped into like materials so downstream processes are targeted and efficient.</p>	 <p>Washing</p> <p>Contaminants are removed and the products are thoroughly cleaned to ensure they meet specification.</p>	 <p>Shredding</p> <p>Shredding and/or crushing reduces the size of bulky materials so they become useful for a new purpose.</p>	 <p>Composting</p> <p>Organics are grouped and decomposed before being converted into rich additives for healthy gardens.</p>
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- 2.5 Repurpose It operates from various sites in Melbourne on a footprint of excess of 240 acres across out three locations, Epping, Hallam, and Montrose. Our site operations support large infrastructure clients, local and state governments.
- 2.6 We partner with local councils and businesses, the Victorian Government and large construction and infrastructure firms for both receiving waste and supplying repurposed materials.
- 2.7 Repurpose It is made up of a group of individuals who are passionate about the work that we do and share a core set of values that guide us each day. As of 30 June 2025, Repurpose It had a total of 179 employees, with 44 females and 135 males located in Victoria. Of these employees, 177 are permanent employees with 2 on a fixed-term contract. Of our 179 employees, there is a total of three employees that are on a visa, one of which was sponsored by Repurpose It.
- 2.8 Our employees perform roles across a number of teams working together to achieve our mission. An overview of the teams and the roles within the teams is set out below.

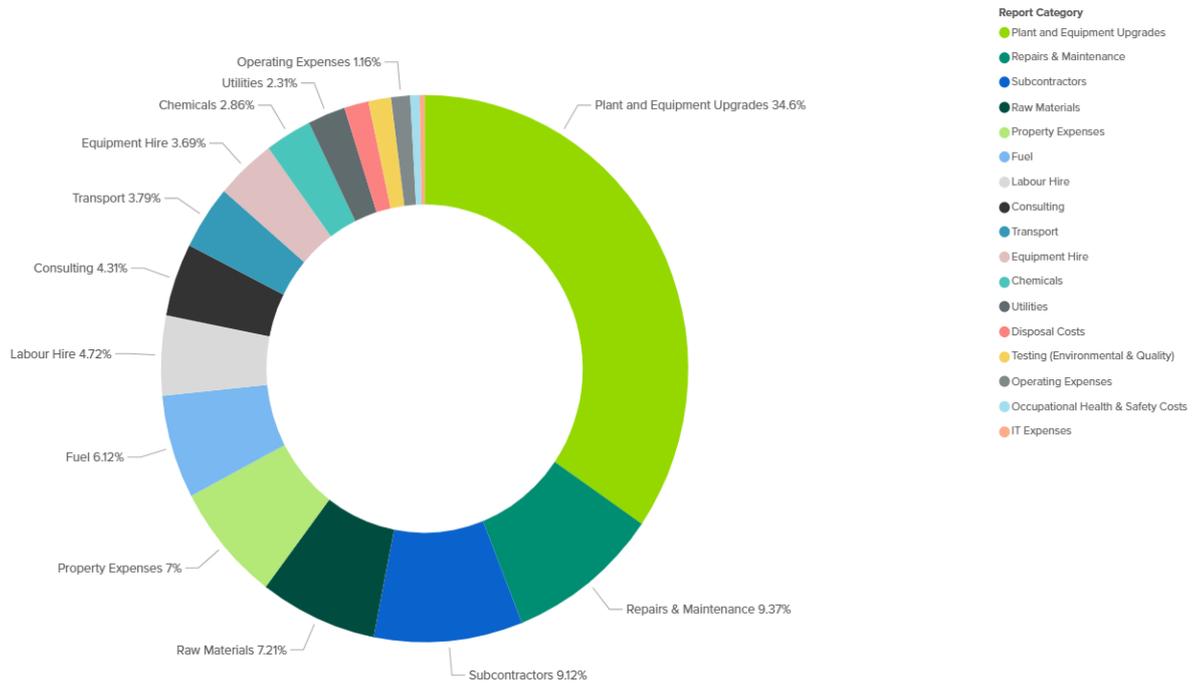
<p>Commercial</p>  <ul style="list-style-type: none"> ◆ Business development & partnerships ◆ Commercial Account Managers ◆ Customer service and support ◆ Marketing ◆ Weighbridge Operations 	<p>Corporate</p>  <ul style="list-style-type: none"> ◆ Administration ◆ Finance ◆ HR ◆ ITC ◆ Procurement 	<p>Environment & Sustainability</p>  <ul style="list-style-type: none"> ◆ Environmental Scientists ◆ Environmental Engineers ◆ Graduate Environmental positions
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<p>Logistics</p>  <ul style="list-style-type: none"> ◊ Logistics Management ◊ Local Drivers ◊ Country Drivers 	<p>Maintenance</p>  <ul style="list-style-type: none"> ◊ Maintenance Engineers ◊ Mobile & Fixed Plant Maintenance ◊ Maintenance Schedulers 	<p>Operations</p>  <ul style="list-style-type: none"> ◊ Data Scientists ◊ Major projects & civil works ◊ OHS
<p>Organics</p>  <ul style="list-style-type: none"> ◊ Fixed plant Operators ◊ Excavator Operators ◊ Loader Operators ◊ Shredder/Grinder Operators 	<p>Resource Recovery</p>  <ul style="list-style-type: none"> ◊ Fixed plant Operators ◊ Excavator Operators ◊ Labourers ◊ Loader Operators ◊ Moxy Drivers 	<p>Technical & Quality</p>  <ul style="list-style-type: none"> ◊ Lab Technicians ◊ Quality Assurance ◊ Research and Development ◊ Technical Assistants

3 Our supply chain

3.1 Our direct suppliers include business supplying us with goods and services including plant and equipment, construction (property expenses), subcontractors, repairs and maintenance, logistics, fuels, packaging materials, labour hire, PPE as well as indirect goods and services such as office supplies, merchandise management, cardboard packaging, information technology hardware, software and telecommunications, marketing and professional services.

3.2 The annual spend by supplier category during the reporting period is shown below:



3.3 Repurpose It’s washing facility, as shown in the image below is supported by state-of-the-art technology imported from Europe. Here, we wash contaminated soil and other excavation waste in preparation for repurposing into recycled materials. In operating the plant, we rely on goods and services as described above.



3.4 With the exception of machinery, vehicles and parts, the majority of Repurpose It’s direct suppliers are based in Australia. Many of these suppliers, however, are likely to source from wholesalers, suppliers of raw materials or components from overseas.

4 Modern slavery risks in our operations and supply chains

Operational risks

4.1 As described in paragraph 1.2, the term modern slavery has a high threshold. Our operations are only in Australia, a country considered to have a lower prevalence of, and vulnerability to, modern slavery according to the Global Slavery Index. This risk profile reflects:



- (1) relatively strong criminal justice mechanisms and efforts to address underlying risk factors;
- (2) highly regulated industrial relations laws and enforcement of laws in Australia; and
- (3) the implementation of the legislation such as the Modern Slavery Act to address modern slavery in global supply chains.

- 4.2 Despite these measures, it is estimated that 41,000 people were living in modern slavery in Australia on any given day in 2021. This equates to 1.6 people in every thousand people in the country. Forced labour predominantly occurs in high-risk industries such as agriculture, construction, cleaning, hospitality, and food services largely due to the reliance on migrant workers who enter Australia on temporary visas. Although our industry could be regarded as being at higher risk of forced labour by virtue of our connection to the construction industry, our workforce is predominately local to Victoria and comprises largely skilled workers. Our labourers, drivers and maintenance crews are critical to our business, and we provide all of our workers with healthy and safe working environments and provide remuneration in accordance with market rates, as described further in the next section.
- 4.3 The lower country risk for modern slavery, combined with our compliance with employment laws, our remuneration framework and our value of “care and protect” in our workplace reduces the risk that our direct employment of workers caused, contributed or has been linked to modern slavery.
- 4.4 Although the Act does not formally require reporting entities to describe the risks of modern slavery posed by customers, we recognise that this is an area where we may be “linked”, as per the UNGP continuum of involvement, to adverse human rights impacts via the business conduct of our customers. We supply materials to the likes of construction companies that may then subcontract labour to third parties performing base skilled roles which can result in limited visibility over working conditions and increase the risks of modern slavery. For example, one of our customers described labour hire in landscaping as an area carrying a greater risk of being directly linked to modern slavery and they have undertaken a specific project to mitigate the risks in this area.

Our supply chain and modern slavery risks

- 4.5 As a business operating a circular economy, the bulk of materials that we source and process for re-sale have come from local construction sites in Australia. Therefore, in applying the UNGP continuum of involvement, there is a low risk that our business has caused or contributed to adverse human rights impacts. However, given the risks of modern slavery in the construction industry, there is an inherent risk that the materials we collect from sites have been demolished or handled by potentially vulnerable workers as described in paragraph 4.3 above.
- 4.6 The heavy machinery and vehicles including trucks and plant that we use in our washing facilities are manufactured overseas by mostly European headquartered companies such as Sweden and Germany so the tier 1 country risk for modern slavery would be considered low. However, most original equipment manufacturers (**OEMs**) have partnerships and sourcing arrangements with companies located in higher risk jurisdictions which is often the start of long and complex supply chains all the way down to the mining and processing raw materials, often the result of modern slavery, such as the worst forms of child labour, debt bondage and forced labour.
- 4.7 Our current focus remains on Tier 1 suppliers, where we have identified risks primarily in labour hire and construction services. We recognise that modern slavery risks can also occur further down the supply chain, including Tier 2 suppliers supporting OEMs. We plan to enhance visibility and due diligence in future reporting years.
- 4.8 In terms of our office operations, we recognise that certain products such as IT hardware (including laptops, phones and tablets), office furniture and consumables may present modern slavery risks globally, particularly where manufacturing occurs in higher risk jurisdictions. For Repurpose It, these categories represent a very small proportion of our overall spend (IT



hardware accounted for approximately 0.3% in FY25). While we primarily source from Australian businesses, some products may originate from overseas manufacturers, which means risks can exist beyond our immediate suppliers. We will continue to monitor these areas as part of our broader risk management approach.

- 4.9 Labour hire is also considered to have higher risks of modern slavery, including in lower risk countries like Australia, because of opaque subcontracting arrangements resulting in diminished visibility over the pay and entitlements of workers and the utilisation of temporary visa holders who are vulnerable to exploitation and underpayment.
- 4.10 We rely on labour hire to provide coverage in peak seasons, to assist with one-off projects and/or to cover periods of annual leave of permanent Repurpose It employees. Labour hire is used for these purposes in operational roles in the business only. However, we only use reputable labour hire agencies licensed with the Victorian Government Labour Hire Authority which requires agencies to comply with a range of laws, including:
- (1) workplace laws
 - (2) taxation laws
 - (3) superannuation laws
 - (4) occupational health and safety laws
 - (5) workers compensation laws
 - (6) labour hire industry laws
 - (7) migration laws
 - (8) transport laws
 - (9) applicable accommodation standards

5 Approach to assessing and addressing modern slavery risks in our operations and supply chains

Measures in our operations

- 5.1 Our value “care and protect” carries across into our employment of all team members. An overview of our approach to enriching the lives of our people are set out below:



Career Development

- Professional development and eLearning programs
- On the job training and development
- Internal promotion of vacant positions to allow for career progression and diversification
- Participation in industry conferences and networking events
- Future Leaders Program
- International travel opportunities with partner organisations

Community

- Paid volunteering days
- Group volunteering days at Food Bank
- Community and volunteering opportunities with Community Gardens and the 'Gifts for Families' program
- Participation in community events and fundraisers

Diversity and Inclusion

- Finalist in the 2022 Victorian Manufacturing Industry Awards Diversity and Inclusion category
- Ongoing partnerships with Brotherhood of St Laurence, Union Property Corporation and Outlook Environmental Services.

Health and wellbeing

- Employee Assistance Program (EAP) for all employees and their family
- Free mental wellness, financial and nutritional advice via the EAP
- Participation in awareness-raising initiatives and days – R U OK? Day, Men's Health Week, Women's Health week, Skin Cancer Awareness Week, World Mental Health Day

Reward and recognition

- Annual Employee Recognition Program based on Repurpose It's values
- Employee Referral Program with \$2000 visa gift cards available
- Quarterly food-trucks and events onsite
- Employee discounts via Employment Hero (gym memberships, health insurance, gift cards, retail products etc)

Safety

- Safety-focused culture ensuring everyone goes home safely at the end of each day
- Full PPE provided for all employees in line with role requirements
- Regular industry-specific safety speakers

- 5.2 In addition to the above measures, our human resources information system ensures that all employees have full rights to work in Australia via VIVO checks. The system produces a compliance report specifically around visas, expiry dates and eligibility to work in Australia and it has capabilities to send out alerts to the relevant managers where a visa is due to expire or a person does not have eligibility to work in Australia.
- 5.3 To mitigate the risks of excessive work hours (amongst other metrics), the payroll team runs weekly reports to monitor the number of hours worked by employees which flags any hours that are deemed to be excessive. Relevant personnel are then alerted to the issue so that the causes can be investigated, managed and prevented.
- 5.4 Our employees are offered competitive remuneration packages in excess of the minimum wage and above Award rates for their classification role. Our General Manager of People and Culture develops and implements solutions across employee relations, recruitment and retention,



organisational and professional development, performance management, payroll, industrial relations and workplace safety and wellbeing. Modern slavery is now the subject of its own standalone policy, complementing our existing policies and procedures that mitigate risks such as worker exploitation and unsafe working environments.

- 5.5 During the reporting period, we did not employ anyone under the age of 18. Many of our positions require either formal qualifications or licences which limits the scope for engaging underage employees.

Supply chain due diligence

- 5.6 The UNGPs sets out four key parts to due diligence. We have set out below each part, the steps we have taken:

(1) **Identifying and assessing actual and potential human rights impacts.**

We have worked with an external business human rights subject matter expert to undertake initial scoping exercise of the higher risk areas within our supply chain. This will help us to adopt a pragmatic and risk based approach as we mature our approach in future reporting years.

(2) **Integrating your findings across your entity and taking appropriate action to address impacts.**

The integration stage will be the subject of development during the next reporting period. We will work with our subject matter experts to develop measures to adopt modern slavery risk assessment processes.

During the next reporting period, we are implementing procurement risk protocols that incorporate supplier risk assessments and prequalification processes into our sourcing activities.

We have introduced a board-approved Supplier Code of Conduct, which sets clear expectations on ethical practices, including modern slavery. Over the next reporting period, we will embed this Code into all new supplier engagements and work towards onboarding our existing suppliers.

(3) **Tracking your entity's performance to check whether impacts are being addressed.**

We recognise there are many steps ahead of us in achieving greater maturity in our approach to modern slavery. As set out in the next part of this statement, we will set ourselves measurable goals to progress year on year as a way of tracking the effectiveness of our actions. We will also deliver training to staff to increase awareness of modern slavery risks and responsibilities.

(4) **Publicly communicating what you are doing.**

We will continue to share our progress in our modern slavery statements and engage with our suppliers on the topic of modern slavery as we make adjustments to our procurement processes to take modern slavery considerations into account.

Approach to remediation

- 5.7 We have a whistleblower policy and confidential hotline to enable reporting of concerns, including modern slavery risks. If we are found to have caused or contributed to modern slavery, we would take guidance from the UNGPs in our approach to remediation. We will assess the effectiveness of our grievance mechanism to ensure that it is accessible to, and understood by, stakeholder groups.



6 Assessing the effectiveness of our actions

- 6.1 As we embark upon the process of undertaking modern slavery due diligence in our operations and supply chains, our goal is to increase our understanding of our connection to modern slavery and how we can use our leverage to increase awareness with our sphere of influence.
- 6.2 During the course of the next reporting period Repurpose It will seek to:
- (1) provide training to our people on modern slavery, why it is important to us, and how we can make a difference as individuals and as a business.
 - (2) explore ways in which we can further embed modern slavery risk assessment within our existing procurement processes.
 - (3) assess the effectiveness of our grievance mechanism.
 - (4) engage with our suppliers, particularly the longer-term suppliers, on the topic of modern slavery to raise awareness of the red flags.

7 Consultation and approval

- 7.1 This statement was prepared in consultation with the entities owned or controlled by Monza Hold Co Pty Ltd. The statement has been approved by the principal governing body of the reporting entity, namely, the board of directors of Monza Hold Co Pty Ltd on 18 December 2025 and signed by a director of the company on behalf of the board.

Signed by:  DocuSigned by:
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[Name] George Hatzimanolis
[Position] Managing Director
[date] 22-Dec-2025 | 4:58 PM AEDT

Statement Annexure – Reporting Criteria

Reporting Criterion	Page
1 & 2. Identify the reporting entity and describe its structure, operations and supply chains	Pgs. 2-5
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Pgs. 5-8
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Pg 9
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Pg 10
6. Describe the process of consultation with any entities the reporting entity owns or controls	Pg 10
7. Any other relevant information	N/A