

FY24 MODERN SLAVERY STATEMENT

This Modern Slavery Statement covers the activities of Container Exchange (QLD) Limited ACN 622 570 209 (**COEX**) during the financial year which ended 30 June 2024 (**FY24**) to identify and mitigate any potential modern slavery risks in COEX's operations and supply chain.

Introduction

COEX is appointed by the Queensland Government as a not-for-profit organisation responsible for implementing, managing, and advancing the Container Refund Scheme 'Containers for Change' in Queensland (**Scheme**). The Scheme is authorised under the *Waste Reduction & Recycling Act 2011* (Qld) and COEX reports to Queensland's Minister for the Environment and the Great Barrier Reef.

COEX manages a network of more than 350 collection refund points (**CRPs**) across Queensland incorporating depots, reverse-vending machine depots, bag drops and pop-ups, with 83 independent operators contracted to run the CRPs in the Scheme.

As an Australian business generating annual revenue in excess of AU\$100 million, we acknowledge that COEX is required to publish an annual Modern Slavery Statement, in accordance with Section 13 of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). This is COEX's Modern Slavery Statement, which we have prepared in relation to FY24 (**FY24 Modern Slavery Statement**).

In this FY24 Modern Slavery Statement:

1. 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
2. Modern slavery risk refers to the prospect of a practice involving modern slavery occurring in a business's operations and/or supply chain.

Position Statement

COEX will not accept the existence of any form of modern slavery in connection with our business. We recognise our responsibility to work with our members, 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.

Our Organisational Structure

COEX is an Australian public company limited by guarantee. COEX has two members, Coca-Cola Europacific Partners Australia Pty Ltd ACN 076 594 119 and Lion Pty Ltd ACN 128 004 268. COEX's registered office is Level 13, 295 Ann Street Brisbane, Queensland, 4000.

COEX is not part of a larger corporate group of entities and does not own or control other entities.

Our Business

Operations

COEX is the not-for-profit organisation responsible for implementing, managing, and advancing the Scheme in Queensland. COEX employs approximately 82 people and manages approximately 147 independent contracts,

including CRP operators, processing (sorting) of containers, logistics between CRPs, processors and sale of recyclable materials. For further information about COEX's operations, please refer to COEX's website (www.containerexchange.com.au).

Supply Chain

Category	Details
Technology used in the Scheme	Consistent with standard commercial practice, COEX facilitates procurement of technology for use in its operations.
Outsourced back-office services	COEX has a services agreement with Circular Economy Systems Pty Ltd ABN 32 623 565 471 (CES) to provide certain services, including finance and accounts payable services and customer call centre support.
Customers (Suppliers)	COEX receives containers sold for consumption in Queensland from persons presenting such containers for deposit at a CRP.
Operators (various)	COEX contracts with numerous operators for various purposes, including but not limited to, CRP operations, processors, and logistics.

Our Approach, Risk Assessment & Mitigation Plan

Approach

To support COEX's compliance with the Modern Slavery Act (including publication of this FY24 Modern Slavery Statement), COEX's Management:

1. Commissioned a Modern Slavery Maturity Assessment on COEX's Operations (**Maturity Assessment**);
2. Conducted an assessment of the modern slavery risks which are presented by COEX's unique operations and supply chain (**Risk Assessment**); and
3. Implemented 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 that we took to mitigate those modern slavery risks are outlined below in this FY24 Modern Slavery Statement.

Risk Assessment – Potential modern slavery risks

The following potential modern slavery risks in relation to COEX's operations and supply chain have been identified and managed:

Business area	Modern Slavery Risk	Description of Modern Slavery Risk
Operations	Commodity risks	The materials that are recycled through the Scheme are sold to purchasers who engage in practices which constitute modern slavery.
Operations & Supply Chain	Workforce risks	That any workers in COEX's workforce or the workforce of Scheme operators' are subject to conditions which constitute modern slavery.
Supply Chain	Supply chain risks	<p>That there are modern slavery risks in the operations and/or supply chains of COEX's various contractors and suppliers:</p> <ul style="list-style-type: none">• Supply of technology – 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 the supplier (being CES).• Specialist logistics service providers – the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, given that COEX's various service providers are well reputed professionals in their respective fields, are physically located in Australia and operate in a heavily regulated industry.• Collection point partners – the Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, given that COEX's contracted partners are large and small businesses and community organisations that are physically located in Australia.• Material Recovery Facility operators – These contractors are paid recovery amounts for containers recovered through their contracted services with the respective local councils. The Risk Assessment concluded that material recovery activities performed by these facilities are considered to present low modern slavery risk.• Processors - The Risk Assessment concluded that these procurement activities presented a relatively low modern slavery risk, given that COEX's contracted partners are large and small businesses and community organisations which are physically located in Australia.

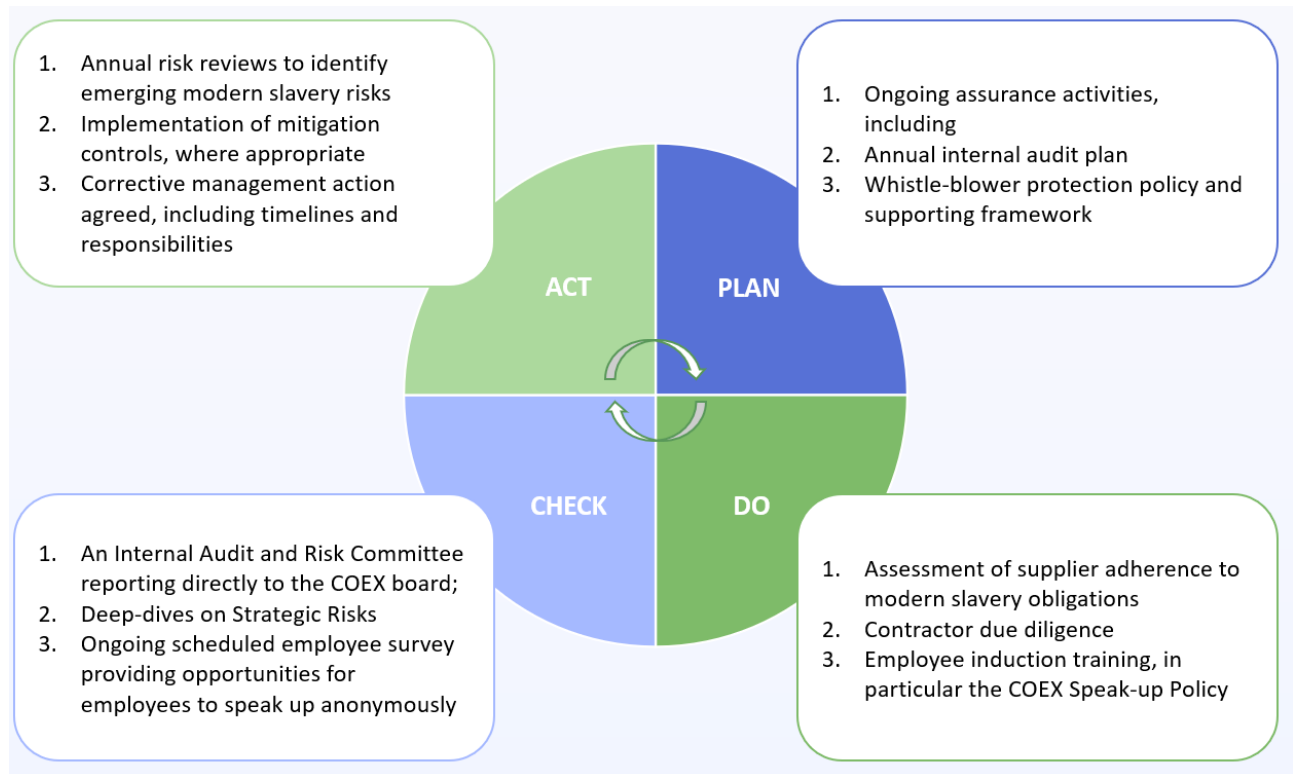
Actions – Mitigation of potential Modern Slavery Risks

During FY24, COEX took the following actions to mitigate the potential of Modern Slavery risks which were identified as part of the Risk Assessment (see above).

Business area	Modern Slavery Risk	Mitigation of Modern Slavery Risk
Operations	Commodity risks	<p>Due diligence checks were performed on all COEX's buyers prior to them being accepted into the Scheme as purchasers of material.</p> <p>Regular risk-based audits are performed on purchasers to ensure ongoing assessment of Modern Slavery Risks.</p>
Operations & Supply Chain	Workforce risks	<p>Material introduced to the Scheme is from the Queensland public and limited to beverages sold for consumption within Queensland.</p> <p>The risk of underage children being exploited within the Scheme is mitigated by our terms and conditions prohibiting accounts by children under the age of 13 years of age. Parental consent is required for individuals between 13 and 18 years of age.</p> <p>With respect to independent operators within the Scheme, all parties in the supply chain are Australian entities (Container Refund Point Operators (CRPOs), Logistics Providers, Equipment Suppliers and Processors) and are legislatively and contractually required to adhere to all Australian laws, including all relevant industrial, Work Health and Safety (WHS) and, for most suppliers, Modern Slavery laws.</p> <p>Multiple avenues for whistleblower disclosures are available for anonymously reporting suspected breaches of legislation and 'an improper state of affairs.' No disclosures concerning modern slavery have been reported.</p>
Supply Chain	Supply chain risks	<p>Back-end technology infrastructure is provided by an Australian entity and is both legislatively and contractually required to adhere to all Australian laws, including industrial, WHS and Modern Slavery laws.</p> <p>The Modern Slavery Risks in the logistics industry are nil given that it is a heavily regulated industry with specific requirements for modern awards for payment to workers and only limited to licence holders can provide logistics services.</p> <p>The Queensland public is the ultimate supplier of Scheme material, being eligible used beverage containers.</p> <p>Eligibility is directly related to the provenance of material, i.e. being sold for consumption in Queensland, or a corresponding domestic jurisdiction.</p>

Assessing the Effectiveness of Our Actions

COEX has an ongoing assessment process to measure and improve its culture of identifying and remediating modern slavery in its supply chain. COEX monitors for any incidents of modern slavery through its risk assessments and audit processes. These measures for FY24 include steps to plan, do, check and act:



COEX takes its responsibility to identify and remediate modern slavery very seriously and will continue to work on developing its frameworks and processes to improve its review of the effectiveness of its actions to assess and address modern slavery risks in its operations and supply chains.

Consultation Process

This statement was prepared in consultation with internal stakeholders of COEX. We advise that COEX does not own or control other entities, and therefore sections 14 and 16(1)(f) of the Modern Slavery Act do not apply.

Our Plans for FY25

During FY25, COEX plans to take the following actions to further strengthen its approach to identify and manage any potential modern slavery risks:

1. Review its assessment framework for Modern Slavery Risks,
2. Formalise and implement a COEX Policy on Modern Slavery; and

3. Progress with continuous improvement 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.

This FY24 Modern Slavery Statement has been approved by the Board of Directors of Container Exchange (QLD) Limited.

Signed



Andrew Clark, Chair
Container Exchange (QLD) Limited

Date: 28 December 2024