

The logo for VICReturn, featuring the text 'VICReturn' in a white, sans-serif font on a blue background. The background of the entire page is a photograph of a hand holding a clear plastic water bottle with a yellow cap, with other bottles blurred in the background.

**VICReturn**

# Modern Slavery Statement

Financial Year 2024

# 1. Introduction

VicReturn Limited ABN 54 643 014 895 ('**VicReturn**', '**us**', '**our**' or '**we**') is a not-for-profit organisation appointed by the State Government of Victoria ('**State**') to coordinate Victoria's Container Deposit Scheme ('**CDS Vic**' or '**the Scheme**').

This statement is made under the *Modern Slavery Act 2018* (Cth) and sets out the actions taken by VicReturn to identify, assess and address modern slavery risks in our operations and supply chain during our financial year ending 30 June 2024 ('**FY24**'). VicReturn, as part of its program of work as Scheme Coordinator of CDS Vic, is committed to identifying and managing modern slavery risks in line with our risk management framework and commitment to industry best practice.

VicReturn recognises that modern slavery is a worldwide issue, and that to address the challenges of modern slavery within our operations and supply chains, collaboration with our business partners is needed. VicReturn is committed to ensuring that, as far as reasonably practicable, when developing policies, risk mitigation and compliance with regulatory requirements regarding modern slavery is considered.

## 2. Our structure, operations and supply chain

### 2.1. Structure

VicReturn is a company limited by guarantee, operating from Victoria. VicReturn was formed in 2020 for the purposes of bidding to become the coordinator of the Scheme by Lion Pty Ltd ABN 50 128 004 268, Coca-Cola Europacific Partners API Pty Ltd ABN 26 004 139 397 and Asahi Beverages Pty Ltd ABN 51 004 243 994..

Along with directors from VicReturn's three founding companies, VicReturn's Board consists of an Independent Chair, an Independent Director and a director associated with small to medium-sized beverage manufacturers.

### 2.2. Operations

#### A. VicReturn's operations

VicReturn is a small not-for-profit organisation, with approximately 35 employees as 30 June 2024. VicReturn began operating during 2023 after being appointed as the Scheme Coordinator of the Scheme. VicReturn spent the majority of 2023 leading the mobilisation of the Scheme and has spent the first half of 2024 maintaining the Scheme during its first year of operation.

VicReturn is responsible for the governance and administration of CDS Vic, handling the Scheme's financial operations, marketing, community education and integrity framework. Consequently, VicReturn operates a lean organisation comprising skilled professionals residing in Victoria.

In support of VicReturn's primary function, VicReturn's objectives are to:

- Increase recovery and recycling of empty beverage containers
- Reduce the number of empty beverage containers that are disposed of as litter or landfill
- Ensure that first suppliers of beverage products take product stewardship responsibility
- Provide opportunities for social enterprise and benefits for community organisations
- Create opportunities for employment
- Complement existing collection and recycling activities for recyclable waste

VicReturn performs its duties as Scheme Coordinator under a Scheme Coordinator Agreement with the State of Victoria. Under this Agreement, VicReturn is subject to the Victorian Government Supplier Code of Conduct, requiring a commitment to ethical and legally compliant business operations.

with their own reporting obligations and processes in place to identify, assess and address modern slavery risks, or small privately owned businesses with limited supply chain risk.

### 3. Risks of modern slavery in our operations and supply chain

Although VicReturn only recently commenced operations, we have sought to undertake an assessment of our exposure to modern slavery risks prior to preparing this statement. This included a preliminary review of VicReturn's employment and staff management processes, and our partners and suppliers.

At this stage of our review, we have identified that our operational risk is low. We have employment contracts in place with all of our staff that meet legal requirements. We engage Australian based professional services providers, IT suppliers and other suppliers' stationary suppliers to support our business operations.

Staff at our providers were largely based in Melbourne, Sydney or other Australian capital cities. Such providers, by their nature, have an overall low modern slavery chain risk profile due to operating in these locations (using Walk Free's 2023 Global Slavery Index 0 <https://www.walkfree.org/global-slavery-index/map/>) and the maturity of their operations.

While we acknowledge that IT suppliers (particularly hardware suppliers) may be deemed to be higher risk, our relationships are with suppliers located in Australia and any IT hardware is supplied by Australian businesses through managed service arrangements.

VicReturn recognises that, where VicReturn may be indirectly exposed to a higher risk of modern slavery through our supply chains, including the suppliers of its direct suppliers, VicReturn seeks to review those risks through its contract review processes to identify these risks before the supplier is engaged (see further at 4.2).

#### FY24 Supply Chain Categories

Category	% Spend	Profile
IT suppliers	63%	Managed software and systems providers based in Melbourne and Sydney that range in size. Larger providers generally report separately on modern slavery risks on their own or through a corporate group.
Advertising and media, and sponsorships	15%	Marketing, advertising, design, content production and media-purchasing. These suppliers are predominantly small- to medium-sized professional services businesses based in Victoria and Sydney. Sponsorship and event costs were also paid to Victorian schools, community groups and public event managers.
Professional Services	15%	Consultancy services, covering legal, finance, accounting and waste management and recycling consultants. Predominantly Victoria and Sydney based that separately report in modern slavery risks.
Office supplies and rent	7%	Rent and property costs from Melbourne-based premises. Office supplies purchased locally.

engagement. These risk-assessments may include an assessment of modern slavery risk as relevant to the particular supplier and goods or services supplied.

### 4.3. Our people

VicReturn is committed to fostering a workplace culture that promotes diversity, equity, inclusion and belonging (DEIB) in all aspects of our operations. We believe that embracing diversity enriches our work environment and enhances our ability to achieve our mission.

All of our staff are engaged on legally compliant Australian employment contracts.

We affirm our commitment to:

- Providing equitable employment opportunities for all individuals based on merit and without discrimination.
- Creating a workplace that respects and values differences in race, ethnicity, gender, sexual orientation, age, disability, religion, and socio-economic background.
- Fostering an inclusive environment where all employees feel respected, supported, and able to fully contribute.
- Proactively addressing discrimination, harassment, and barriers to inclusion within our company

### 4.4. Our Values



#### Sustainability

We believe that a circular economy can truly transform Victoria's environment. Through recycling drink containers, we can secure a cleaner ecosystem.



#### Collaboration

We value the importance of partnerships to achieve the best social, environmental, and commercial results for all.



#### Impact

We care about what we do and work with purpose and integrity. We're driven by the opportunity to create positive change for all Victorians.

### 4.5. Risk Management

Risk management plays a critical role in understanding and managing risks and uncertainties in the design and operation of each of VicReturn and the Scheme, including safeguarding Scheme funds, protecting people and the environment, and building and maintaining public trust and ongoing adoption.

VicReturn has led the design and implementation of the Scheme Risk Management Framework, in alignment with the International Risk Management Standard (ISO31000: 2018). The Scheme Risk Management Framework is made up of several components designed to effectively manage risk, including a risk management policy, risk appetite statement and identification and management of strategic and operational risks.

VicReturn has led the design and implementation of the Scheme Risk Management Framework, in alignment with the International Risk Management Standard (ISO 31000: 2018). This framework is made up of several components designed to effectively manage risk, including a risk management policy that outlines the principles for effectively managing risk across the Scheme, a VicReturn Risk Appetite Statement that defines acceptable levels and thresholds for risk taking in line with VicReturn's objectives, and detailed processes for the identification, assessment, and management

## 7. Future commitments

It is noted that at the time of this submission, VicReturn has not identified any instance of modern slavery in connection to the organisation, VicReturn however, is committed to refining the way in which risks of modern slavery are identified, assessed and mitigated.

VicReturn has commenced the following initiatives during FY25 to assist VicReturn to identify, assess and manage modern slavery risks in the future:

- The development of a VicReturn Sourcing Framework and Supplier Code of Conduct;
- Mandatory supplier due diligence as a requirement of the VicReturn Sourcing Policy, using a risk-based matrix that considers, among other criteria, the nature of the goods or services procured and the location of the supplier; and
- An internal VicReturn online supplier engagement tool, which will document the accountability for supplier approval, engagement and review by VicReturn staff.

## 8. Consultation

This statement was developed with the input of relevant members of VicReturn's senior management team and Executive.

VicReturn does not own or control any other entities and therefore did not consult with any other entities in the preparation of this statement.

## Approval

This statement was approved by the Board of Directors for VicReturn Limited on 19 December 2024.



Freya Marsden  
Chair



Jim Round  
Chief Executive Officer