



# Modern Slavery Statement

2025

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## 1. Introduction

This Modern Slavery Statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) (**the Act**).

This Statement relates to the operations of Recycle and Resource Holdings Limited (BINGO). Recycle and Resource Holdings Limited became the ultimate holding company of BINGO Industries Limited and its controlled entities (**BINGO**) on 5 August 2021. BINGO is the operating group that encompasses all of BINGO's operations and people.

This Statement is made by BINGO on behalf of the following entities:

- BINGO Holdings Pty Ltd
- BINGO Recycling Pty Ltd
- BINGO Waste Services Pty Ltd and
- BINGO Bins Pty Ltd and its subsidiaries

In accordance with the Act, this Statement sets out the actions BINGO has taken to identify, assess and mitigate any actual or potential modern slavery risks in our operations and supply chain for the financial year ended 30 June 2025 (**FY25**).



## 2. CEO Statement

I'm pleased to present our Modern Slavery Statement for 2025, the sixth published by BINGO for the *Modern Slavery Act 2018 (Cth) (Act)*.

In accordance with the Act, this Statement describes the actions of BINGO to address modern slavery risks in operations and supply chains, and the effectiveness of those actions.

Our commitment to sustainable sourcing remains inextricably linked with our aim for Australia to be waste-free. We are deliberate about our actions because we understand the cost of waste.

Of the \$243.1 million spent in FY25 with 1,444 suppliers, over 99% was directed to domestic suppliers. Significantly, no instances of modern slavery were identified in our business or across our supply chain.

Building from previous years, in FY25 we continued to improve our processes to manage the risk associated with modern slavery. Our focus is on best-practice supply chain management, ensuring procurement activities address the risk of modern slavery.

Regulatory compliance and sustainable sourcing is integral to our social licence to operate and therefore the commercial viability of our business. We will continue to work closely with suppliers and manufacturers to identify and address modern slavery risks in supply chains and business operations.

We look forward to continued improvement in the identification and eradication of modern slavery both within Australia and beyond.



**Kevin Gluskie**  
Chief Executive Officer



### 3. BINGO operations

BINGO is a recycling and waste management company that provides end-to-end solutions across the resource management supply chain including collection, processing and recovery, waste disposal, recycled product and bin manufacturing.

#### Key business pillars

##### Logistics



BINGO's logistics operations are carried out through two key business divisions: BINGO Bins and BINGO Commercial. BINGO Bins focuses on the collection of non-putrescible Building and Demolition (B&D) waste from a wide range of construction sites, civil and infrastructure projects and households.

BINGO Commercial focuses on the collection of Commercial and Industrial (C&I) waste from customers across a range of sectors, including commercial office, hospitality, education, retail and manufacturing.

##### Operations



BINGO operates a network of fully integrated transfer stations, recycling and disposal assets and recycled product manufacturing services. We divert waste from landfill by sorting and processing mixed waste for reuse, recycling, or further treatment at other facilities.

BINGO manufactures a range of recycled landscape and building products as part of its ECO Product range of aggregates, road bases, sands and mulches.

##### Subsidiaries and Joint Venture



##### TORO Waste Equipment

BINGO's other business activities include the manufacture and sale of steel and plastic bins through BINGO's wholly-owned subsidiary, TORO Waste Equipment. TORO services the waste management, mining and construction industries.

For more information please see the TORO website:

<https://torowasteequipment.com.au/>



##### Djurwa

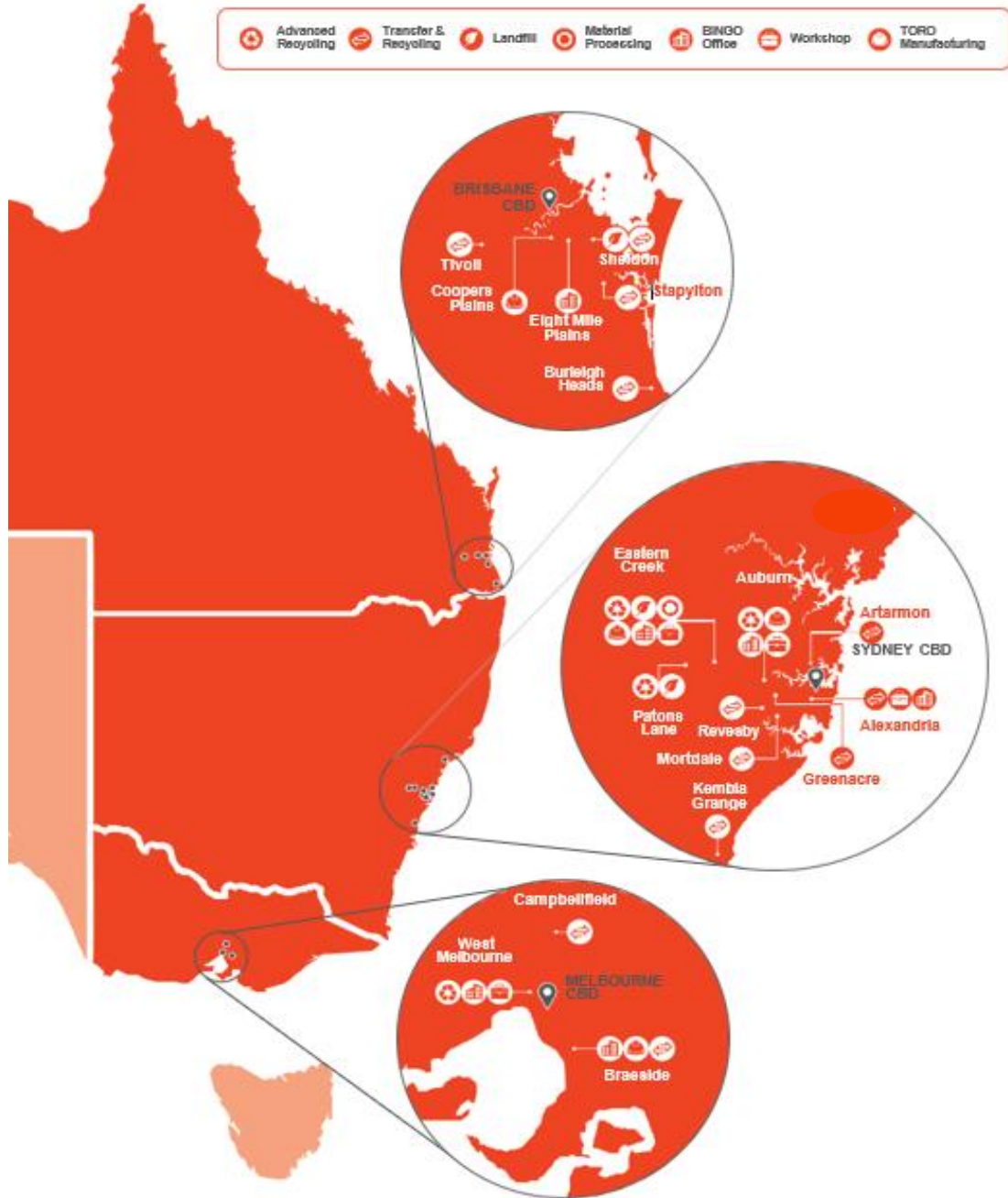
BINGO is a minority partner in the Indigenous recycling and waste management company, Djurwa. BINGO's Indigenous business partner in this joint venture is Yalagan Group – a leading Aboriginal training and mentoring company. Djurwa is a profit-for-purpose business, offering best-in-class recycling and waste services while working to improve economic participation for Aboriginal and Torres Strait Islander peoples.

For more information please see the Djurwa website:

<https://www.djurwa.com.au/>

## Location of operational sites

BINGO operations span Sydney and surrounds; southeast Queensland; and greater Melbourne.



## 4. Business Structure

As of 30 June 2025, BINGO had **1,218 employees** across New South Wales, Victoria and Queensland. Of this number, 42 were casual and 7 were engaged on a fixed term basis. All other employees were engaged on a permanent basis.

88% of our colleagues were engaged in frontline or customer-facing roles in the Logistics or Operations divisions. Committed to local hiring and providing strong employment conditions, BINGO offers direct employment to drivers, operational staff and support team members.

Our employees undertake a range of functions including sorting waste and operating machinery, driving vehicles, supporting customers and manufacturing bins for TORO.

Key brands and trading names used in the course of BINGO's operations include:

- BINGO
- BINGO Industries
- BINGO Waste Bins
- BINGO Skip Bins
- BINGO Waste Services
- BINGO Commercial
- TORO Waste Equipment, and
- United Waste Services.

With all operations wholly within Australia we have complete visibility of labour practices within our business.

The diagram below illustrates the structure of the BINGO business.



## 5. Modern Slavery Statement

**BINGO is committed to upholding high standards of labour and human rights governance within our operations and across our supply chain. We are determined to play our part to ensure the eradication of modern slavery.**

We are committed to action that protects vulnerable people against modern slavery. We support the position of the Australian Government that there is no place for modern slavery in the Australian community or in any global supply chain. We believe all businesses should be working towards supply chain transparency and accountability.

BINGO is committed to continuous improvement across our systems and processes to avoid complicity in modern slavery relating to our own operations and supply chain.

## 6. The BINGO Supply Chain

BINGO spent \$243.1 million with 1,444 suppliers in FY25.

Over 99% of our direct spend is in Australia, reinforcing our support of local businesses, where practices are within the full view of Australian regulators. This approach significantly reduces exposure to higher risk international supply chains.

The TORO business, which manufactures bins in Australia, purchase some materials from suppliers offshore. We maintain open dialogue with key suppliers about their work to eradicate modern slavery: some relationships with suppliers go back more than a decade.

Noting the diverse range of goods and services we procure, spend is managed centrally by the BINGO Procurement team, apart from site-based transactional spend. Cognizant of the impact of slavery and human trafficking, BINGO has analysed key expenditure categories and identified the high-risk products and services procured from countries that pose an elevated modern slavery risk.

Suppliers were prioritized based on the following factors:











- National and international suppliers which are either bigger than BINGO or are already required under Modern Slavery Act 2018 to complete their own Modern Slavery Statement;
- Level of risk for industry, product/services risk or entity risk;
- Geographic risks: where the organisation is situated, either locally or overseas;
- Level of influence, including BINGO's spending and long-term relationships with key supply partners; and
- Direct relationship to risk: suppliers either directly linked to our supply chains that deliver services to clients or are linked directly to our operations.

A thorough planning process is conducted annually and categories prioritised for review and action throughout the year. Our assessment and remediation approach is aligned with the UN Global Compact's Guiding Principles on Human Rights Due Diligence.

BINGO's actions to enhance the human rights of individuals in our up and down stream supply chain, and our own operations, include:

- Mandatory attendance at an induction session, including presentation of our safety standards, for every new employee;
- Policies and procedures to promote employee compliance and understanding, particularly in the Procurement team;
- Internal training and the implementation of awareness programs; last completed in October 2024, and
- Our Supplier Code of Conduct.

## Risk identification within the BINGO supply chain

Risk Proximity	Products and Services	Key Labour Issues
 <b>Direct on-shore and on-site activities</b>	 <b>Construction, repairs and maintenance activities</b>	Activities connected with construction, including labour hire and third-party subcontracting
	 <b>Facilities management</b>	Some industries rely on indirect or subcontracted labour which can have a higher likelihood of workplace compliance gaps
	 <b>Travel and accommodation</b>	Indirect labour can feature in the hospitality and travel industries
 <b>Supply chain</b>	 <b>Vehicles, plant and equipment</b>	Health and safety as well as human rights and governance in the overseas supply chain of parts, equipment, components, and other manufactured goods.
	 <b>Building materials</b>	Health, as well as safety and human rights and governance   in the overseas supply chain of building materials such as cement, hardware, metals and brick.
	 <b>Business-related services and professional services</b>	Offshore/subcontracted corporate services such as financial, travel or marketing sectors and labour rights in food production in Australia and overseas.
	 <b>IT products and services</b>	Despite purchasing from reputable suppliers, components may be manufactured in locations that have a higher risk of modern slavery.
	 <b>Marketing and human resources</b>	Human rights and governance in the overseas supply chain of merchandise and uniforms including personal protective equipment.

### Tier 1, 2 and 3 suppliers

Understanding the dynamics of our supply chain provides valuable perspectives on the resilience and risks to our business. This enhanced visibility of our supply chain fosters the development of a robust and sustainable business.

This underscores the significance of adopting supplier tiering or systematically classifying our suppliers within the context of our supply chain to assess modern slavery risks.

#### Suppliers can be broken down into three tiers:

**Tier 1:** direct suppliers.

**Tier 2:** supply our suppliers, or subcontract to our direct suppliers.

**Tier 3:** suppliers or subcontractors of our Tier 2 suppliers.

## 7. Responsible sourcing program

The Supplier Assurance Program at BINGO enables us to identify and address the risks of slavery and human trafficking in our supply chain.

The risk analysis used draws on market models that trace commodities and services to assess the likelihood of modern slavery issues across supply chains. This includes the generic risk of Tier 1 suppliers (sourced in Australia), Tier 2 and Tier 3 suppliers who operate in our supply chain beyond our Tier 1 suppliers.



### Aligning with ISO 20400 – Sustainable Procurement

In FY21 BINGO commenced a process to align sourcing and procurement processes with ISO 20400 Sustainable Procurement. We did this to ensure our actions to address modern slavery are being directed by an internationally recognised standard.

In FY24 the Edge Impact organisation was commissioned to complete a comprehensive review of our current procurement and risk management practices including stakeholder interviews against ISO 20400. This review provides an overview of BINGO's performance across the different requirements of the standard, and recommendations for improvement.

The outcomes of the review provided strong data points for a future action plan for further improvement over time.

BINGO achieved a performance score of 93%, exceeding the self-set target of 85% and up from 82% in FY22.

With ISO 20400 slated for a bi-annual review, the next review is due to be undertaken in FY26.

The four areas are:

#### Fundamentals

**Fundamentals** of sustainable procurement, which include: the principles, core subjects, risks and opportunities, and the setting of priorities.

#### Policy and strategy

**Procurement policy and strategy** for integrating sustainability at a strategic level and defining sustainable procurement for senior leaders to provide direction and key intentions for the organisation.

#### Enabling

**Enabling** conditions and management techniques that help create the right conditions and practices, and which assist individuals with the integration of sustainability into the procurement function.

#### Procurement process

**Procurement process** describes how sustainability is integrated into the actual functions of procurement, such as planning, assessment and review.

## Prioritisation of suppliers to target modern slavery risk

BINGO recognizes that procurement processes play an integral role in effectively preventing and mitigating the risk of modern slavery.

Based on this analysis, we developed a roadmap of recommendations aimed at further embedding responsible sourcing initiatives throughout the business.

Key achievements to date include:

- BINGO Responsible Sourcing Roadmap development;
- Improving our approach for supplier assessment and onboarding in relation to modern slavery;
- Ensuring that we capture modern slavery requirements in all sourcing initiatives and a key part of the selection criteria; and
- A risk and opportunity management plan for the top five at-risk spend categories.

## 8. Due Diligence Framework

Based on the risk and prioritisation process, BINGO has outlined the requirements for specific high-risk categories and identified the key suppliers that should be considered throughout the sourcing process, from the initial identification of need though to supplier performance management.



*BINGO's Due Diligence Framework*

### Due diligence in practice

#### Embedding modern slavery risk management into the procurement process

BINGO has developed clear objectives and created a set of tender and evaluation criteria according to key issues, such as the risk of forced or child labour in the supply chain, or exploitation of migrant or low-skilled workforce at operational sites.

#### Engaging on modern slavery

We mapped our key stakeholders to identify who we need to inform, engage and partner with to increase our effectiveness and prevent and mitigate modern slavery risks. Ongoing training of our team is conducted on a regular basis.

#### Modern slavery self-assessment questionnaire

The questionnaires are tailored for our diverse supplier base which comprises SMEs, contractors and large national/multi-national corporations. Different suppliers will be assessed differently according to the industry that they operate in.

### Communicating our common goal

To ensure that our employees, contractors and suppliers align to a common goal, our Procurement Policy reflects our Human Rights Policy. The Procurement Policy communicates our vision for responsible sourcing and articulates the principles for ethical procurement based on BINGO's Sustainability Framework pillars and targets.

### Employee Listening

BINGO has several channels internally for raising grievances, as well as our confidential third-party managed Speak Up hotline, which operates as a Whistleblower program.

Training on awareness about modern slavery remains available as an on-demand resource. The course educates stakeholders on the requirements of Modern Slavery when they are looking to purchase goods and services from a new or existing supplier.

In FY25, no modern slavery concerns were raised via grievance procedures.

### Remediation

In the event BINGO becomes aware of slavery or human trafficking within our supply chain, our approach is to remediate issues directly with the supplier. BINGO's initial response is to cease work with suppliers, remediate the activity, and take action to embed the change.

Remediation will be focused on working with our suppliers, however there may be instances where referral to regulators is necessary.

### Current performance

BINGO provides suppliers with the opportunity to provide information on their policies and procedures related to reducing the risk of slavery and human trafficking in their supply chain.

## 9. Assessment of Effectiveness

BINGO's Responsible Sourcing Roadmap was completed with implementation commencing with the roll out of our Supplier Assurance Program. Testing the effectiveness of our measures to assess and remediate modern slavery will commence in the next phase of our Responsible Sourcing Roadmap.

We have a robust strategy to identify and mitigate the risk of modern slavery within our extended supply chain. The key learning from the implementation of the roadmap is that by refining BINGO's supplier categorization, the risk analysis can be improved.

Applying BINGO's risk-based approach, BINGO acknowledges its role in working with its suppliers to address human rights requirements, and as such, to date our supplier audits were conducted as collaborative gap analysis and supply chain discovery efforts.

## 10. Consultation with Related Reporting Entities

The decision-making processes of the BINGO Board and Leadership Team combine commerciality with the company's core values. The values guide the standards and behaviours expected of Directors, leaders and employees.

BINGO is committed to the highest standards of corporate governance. BINGO actively promotes sustainable business practices through our Corporate Governance Framework. Our Board and Committees provide the direction and leadership to implement appropriate levels of governance across our company to ensure our decisions and actions are based on transparency, integrity, responsibility and value-creation.

Every BINGO employee is expected to always meet the highest ethical standards and to comply with all applicable policies and laws. BINGO has policies to protect the rights of GOgetters, including providing protection against slavery and human trafficking.

Our policies and codes include:



Reinforcing the standard starts from the first day of attendance to work at BINGO: a compulsory induction program introduces key policies and behavioural guidelines, as well as points for escalation.

Regular updates are also provided to the **Zero Harm** Board Committee. This Committee has responsibility for the ongoing delivery and reporting of the responsible sourcing and modern slavery program.

## 11. The Road Ahead

With continuous improvement an integral part of life at BINGO, we will continue to collaborate with internal and external stakeholders to assess and address slavery and human trafficking within our supply chain.

Looking forward to 2026 we will continue to:

- Review the implementation of ISO 20400 to ensure the right processes are in place
- Continue to issue the supplier self-questionnaire and monitor returns
- Focus on key upcoming contracts to identify and mitigate risks; and
- Review modern slavery compliance audits to assess and eradicate risks from Tier 1 and Tier 2 suppliers.

## 12. Declaration

This statement was approved by the Board of Directors of Recycle and Resource Holdings on or about 12 January 2026. It is signed by Mark Butcher, Chair, being a responsible member of the Board.

A handwritten signature in black ink that reads "Mark Butcher". The signature is written in a cursive style with a large initial 'M'.

**Mark Butcher**

Chairman of the Board of Recycle and Resource Holdings Limited ABN 20 649 347 302