

**REMONDIS®**

WORKING FOR THE FUTURE

# REMONDIS Australia Pty Limited Modern Slavery Statement 2020



> REMONDIS Australia

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Björn Becker  
Chief Executive Officer / Managing Director

## Message from our CEO and Managing Director

I am pleased to present our first Modern Slavery Statement, which has been prepared to meet our reporting requirements under the Modern Slavery Act 2018 (Cth) (the Act).

REMONDIS Australia Pty Ltd and its related entities (REMONDIS), have a zero tolerance approach to any form of modern slavery in connection with our business. As an industry leader across Australia (and globally) in waste management, resource recovery, water & environmental services, we recognise the role that we play in combatting any form of modern slavery practices. We strongly support the Australian Government's policy position that modern slavery has no place in Australian commerce, nor in any tier of the supply chain.

We are firmly committed to:

- identifying and taking necessary actions to mitigate and eliminate modern slavery risks in all of our dealings with customers, workers, contractors, suppliers and with buyers of our recyclable commodities;
- establishing, maintaining and continuously improving our processes and systems to combat modern slavery in all of our operations and supply chain;
- training our people to identify the signs and consequences of modern slavery and effectively reporting any modern slavery concerns to enable timely and meaningful remediation; and
- conducting business with contractors and suppliers with similar values and ethical business practices in relation to modern slavery.

This statement outlines the actions that have been taken by REMONDIS to identify, assess, and address modern slavery risks across our operations and supply chains for the calendar year ending 2020 (the REMONDIS financial year), being the reporting period of this statement (Reporting Period). Whilst REMONDIS' related entities may not be 'reporting entities' for the purposes of the Act, we have adopted a 'business-wide approach', and this statement applies to all of REMONDIS' operations across Australia. REMONDIS makes this Modern Slavery Statement on behalf of the following entities:

- REMONDIS Industrial Services Pty Ltd ACN 628 188 081
- Environmental Treatment Solutions Pty Ltd ACN 126 020 451
- Organic Environmental Solutions Pty Ltd ACN 156 589 687
- Padget Pty Ltd ACN 108 755 497
- REMONDIS Aqua Operations Pty Ltd ACN 630 442 812
- REMONDIS Aqua Australia Pty Ltd ACN 626 109 313

In preparing this statement, we set up a Modern Slavery Working Group with senior stakeholders across our business units to evaluate our supply chain risk profile and conducted our assessment in accordance with a board approved modern slavery action plan. This action plan focused on:

- utilising newly launched policies and procedures (including our Anti-Slavery Policy and the Supplier Code of Conduct) setting out REMONDIS' compliance expectations of all suppliers in our supply chain;
- validating that modern slavery provisions are included in all of our contracts;
- analysing our supplier due diligence & on-boarding evaluation processes;
- refining our business practices and being responsive to any modern slavery enquiries from our stakeholders in a timely manner; and
- establishing internal governance around preparing for this and every subsequent modern slavery statement.

REMONDIS has and will continue to engage with its related entities, workers, contractors, suppliers and customers about modern slavery. Our Modern Slavery Working Group and senior & executive management teams will continue to collaborate, raise awareness across our operations and supply chain, and continue developing strategies and processes to better our understanding of the modern slavery risks in our supply chains and operations, and how best to address and mitigate those identified risks.

Our dedication and commitment to combatting modern slavery is considered by REMONDIS to be an integral part of our social licence to operate in Australia.

**Björn Becker**  
**Chief Executive Officer / Managing Director**  
22 June 2021

This Modern Slavery Statement was approved by the Board of REMONDIS Australia Pty Ltd on 22 June 2021.



REMONDIS Australia's operations are conducted on and across the ancestral lands of Australia's First Nations Peoples.

We acknowledge the traditional custodians of the lands on which our company is located and where we conduct our business. We pay our respects to ancestors and Elders, past and present. REMONDIS Australia is committed to honouring Australian Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual relationships to the land, waters and seas and their rich contribution to society.

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# Our Organisation Structure, Operations and Supply Chains

## REMONDIS Group

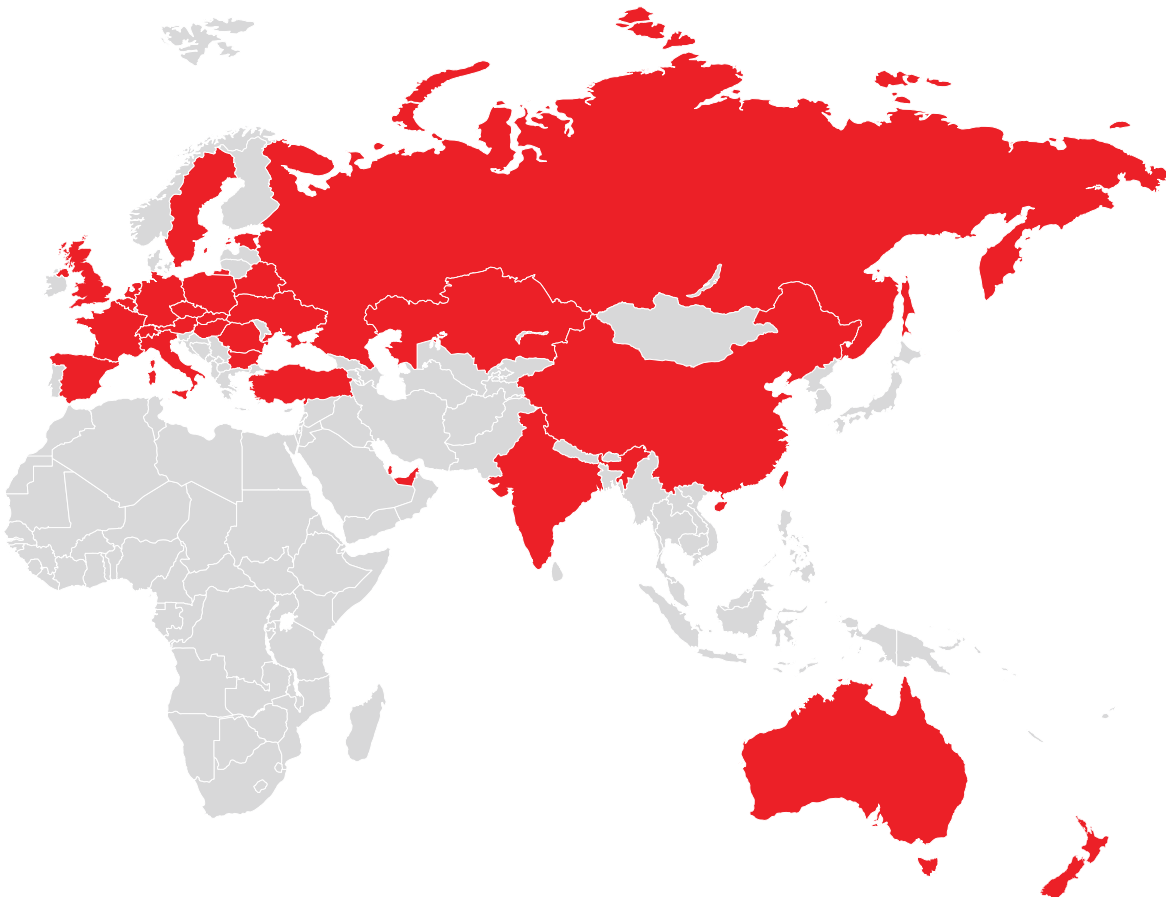
The REMONDIS entities set out in the introduction of this statement, are part of the RETHMANN Group. The RETHMANN Group is a 100% family-owned German service and group comprising RETHMANN SE & Co. KG (RETHMANN Parent) (being a limited partnership under German law) and its subsidiaries.

The RETHMANN Group internationally operates in three broad industries: (1) water and environmental services; (2) logistical services and public transport; and (3) biotechnologies. In Australia, many other subsidiaries of the RETHMANN Parent are involved in these industries.

RETHMANN Group is headquartered in Selm, Germany, where it was founded in 1934. It has approximately 72,000 employees and is present in several hundred cities over 4 continents and 50 countries, including Australia.

REMONDIS is a wholly-owned subsidiary of REMONDIS SE & Co. KG (a company incorporated in Germany, refer to the REMONDIS International website), which itself is a wholly-owned subsidiary of the RETHMANN Parent.

The REMONDIS group is a leading international waste, recycling, water and environmental service company. Across the world, the REMONDIS group provides professional services to more than 30 million individuals and thousands of companies, with over 900 locations in over 30 countries in Europe, Asia and Australia.



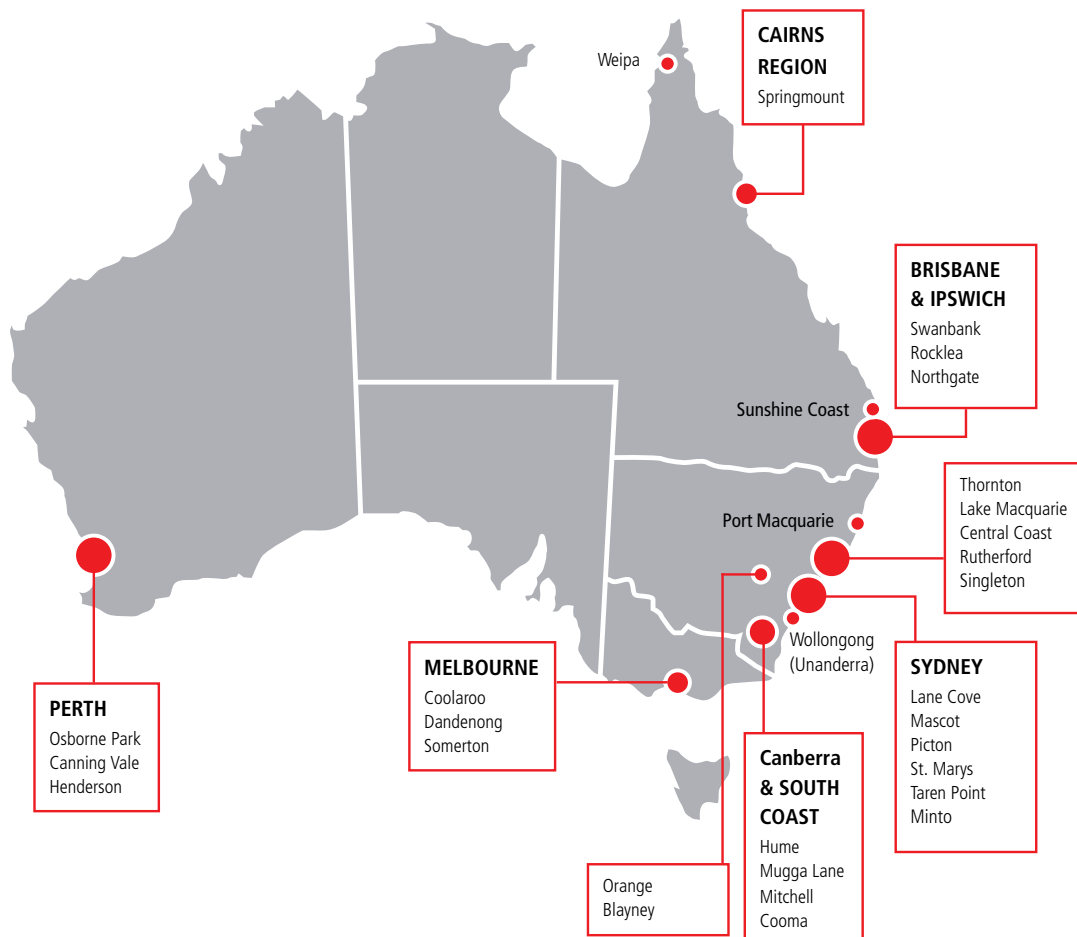
**REMONDIS in Australia**

REMONDIS was founded in Australia in 1982 and commenced operations with a municipal bin supply and waste collection contract for Penrith City Council, in Sydney, NSW. Since then, REMONDIS has experienced significant and sustained growth and is one of the leading participants in the waste industry in Australia. REMONDIS currently provides waste collection services for more than 15,000 commercial customers and, through partnerships with local authorities, approximately 2 million residential premises. In Australia, REMONDIS employs over 800 personnel and boasts a fleet of more than 600 waste collection and transport vehicles.

In addition to waste collection, REMONDIS owns and operates best-of-class landfills, materials recovery facilities (MRFs), transfer stations and waste processing and treatment facilities throughout Australia.

REMONDIS is responsible for landfilling over 1.2 million tonnes of waste in line with world's best practices. With over 30 business locations across cities and regional areas of Australia, REMONDIS is able to fulfil customer needs across a majority of locations nation-wide, passing on the benefits of operational efficiencies to both commercial and municipal customers.

REMONDIS works collaboratively with our parent entities in Germany and sister entities around the world (especially in the UK). This allows us to align our commitment with the RETHMANN group worldwide in taking necessary action to address, mitigate and prevent any modern slavery in the operations of REMONDIS and our broader supply chain globally. For example, REMONDIS UK is also committed to its compliance with the Modern Slavery Act 2015 (UK) and has in place a robust Anti-Slavery Policy in compliance with the UK legislation.



**Our Business and Operations**

We are committed to building a sustainable Australia – where waste is seen as a resource. To achieve this, we support our customers and the wider community by delivering future-proof solutions that contribute to a circular economy. We create the best commercial and environmental outcomes in partnership with our customers, collaborating to deliver customised resource recovery, recycling and reuse services and solutions.

Our business operates under an Integrated Business Management System, which encompasses internationally accredited Quality, WHS, Environment Management Systems, as well as supporting Human Resources and Operational Management to deliver service excellence to all our customers.

Our services include managing the collection and providing processing solutions in relation to the following categories of waste:

<b>Quality</b> ISO 9001	<b>Environment</b> ISO 14001	<b>Health &amp; Safety</b> AS 4801

**CO-MINGLED RECYCLING**  
Paper & Cardboard  
Steel Containers  
Plastic Containers  
Glass

**HAZARDOUS WASTE**  
E-waste  
Quarantine waste  
Medical waste  
Asbestos  
Contaminated Soil  
Oily Rags and Filters

**LIQUID WASTES**  
Grease trap  
Oily water  
Acids & Alkalines  
Solvents  
Chemicals  
Septic

**SECURE WASTE**  
Confidential paper  
Product destruction

**ORGANIC WASTE**  
Garden organics  
Food  
Biosolids

**CONSTRUCTION AND DEMOLITION WASTE**  
Timber  
Concrete  
Brick  
Metal

**CLINICAL AND RELATED WASTE**  
Clinical waste  
Sharps  
Cytotoxic waste  
Anatomical  
GMO  
Pharmaceutical

**GENERAL WASTE**  
Any residual material that is not technically or financially viable to recycle





### Our Supply Chains

We seek to conduct business with suppliers and contractors that have similar values and ethical business practices to us in relation to modern slavery. Although the majority of REMONDIS' waste management, recycling and environmental services operate within Australia, some products, parts and services are being sourced from overseas. It is important to REMONDIS to build meaningful relationships and mechanisms for support and awareness within our supply chain.

Just after the Reporting Period, our new Supplier Code of Conduct was implemented and distributed. It is based on the Responsible Business Alliance Code of Conduct 7.0 (released 1 January 2021), which is a set of social, environmental and ethical industry standards which has been prepared with reference to international norms and standards, including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights. Suppliers are expected to not only comply with our Supplier Code of Conduct, but also implement it in their own supply chain. It is applicable to all of our suppliers and contractors in order to set out the minimum standards of behaviour we expect when doing business with us.

We can provide guidance to suppliers on this code when requested so that we can collaboratively strive for continual improvement in achieving our ethical procurement goals. Clear and honest channels of communication with our supply chain ensures that our expectations in relation to modern slavery are understood and any suitable remedial action can be taken in a timely manner. We understand that the circumstances of each individual supplier can mean that risks of modern slavery and any required remedial action may differ.

As our supply chains are widespread and REMONDIS is in the initial stages of our modern slavery due diligence and supplier review process, we have not yet begun investigating beyond the first tier of our supply chain. Some of the products and services we procure have an inherent risk of modern slavery due to:

- **geographical risks** such as products (or their parts) manufactured in overseas locations, and commodity trading in overseas locations;
- **sector and industry risks**, such as construction, building, waste industry (including third party recycling centres & landfills);
- **product and services type risks**, such as cleaning, security, labour hire and recruitment services; and
- **entity risks** (with respect to any of the above).





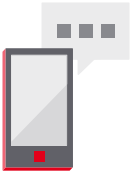


# Identified Risks of Modern Slavery Practices in our Operations and Supply Chains

In this Reporting Period, our analysis of risk categories has shown that a large portion of our suppliers are nationally sourced in Australia. However, our potential exposure sits mainly with international suppliers particularly in the category of vehicles, plant and equipment procurement, construction materials, IT products and PPE gear (as set out in the table below). As these products are sourced and manufactured (including parts) both nationally and internationally as per the REMONDIS International model, REMONDIS had limited visibility and control over the working conditions of overseas manufacturers of these products, services, equipment and materials. REMONDIS has prioritised steps to better understand its first tier supply chain, and we will continue to monitor and work on understanding the geographical risks in our extended supply chain overseas.

In the next reporting period we will commence consolidation of our spend to key suppliers in major categories to assist us to assess and manage any risks in these areas.

For the purpose of this Reporting Period, we identified our top 300 suppliers. Of these top 300 suppliers, we targeted our top 100 higher spend/risk suppliers, to undertake the due diligence supplier questionnaire as well as to implement a requirement for them to adopt (and comply with) our Supplier Code of Conduct. We have commenced continuous surveying of this group and our remaining suppliers will undertake the due diligence supplier questionnaire process when they come up for contract renewal.

Risks	Main Issues
Employment operations of professional services and other business related services 	Labour rights and the working conditions of security and cleaning services for business related services, third party labour hirer, owner drivers or subcontractors, recycling centre workers, customer site workers and commodity trading workers overseas.
Vehicle / Equipment Procurement 	Labour rights and the working conditions of overseas manufacturers of vehicles, plant and equipment including parts & servicing. Fleet & operations teams procure vehicles, compactors and bins, resource derived fuel lines, petroleum, vehicle maintenance repairers, etc.
Construction & Building Materials 	Labour rights and the working conditions of overseas manufacturers of building materials and third party construction companies.
PPE equipment, Workwear, Marketing Merchandise 	Labour rights and the working conditions of overseas manufacturers of these products.
IT products and services 	Labour rights and the working conditions of overseas manufacturers of IT products and services. The majority of REMONDIS software providers have operations in Australia (rather than overseas).

# Actions taken to Address Modern Slavery Risks

## Service Agreements and Supplier Contracts

In the first month of the Reporting Period, REMONDIS updated its service agreements and consultancy contracts to include a standard modern slavery provision. From calendar year 2021, our new supplier onboarding process will ensure that any new supplier arrangements and contracts will include a standardised updated and more prescriptive modern slavery provision, and a commitment to comply with our Supplier Code of Conduct (together with completion of our due diligence supplier questionnaire) so that, at a minimum, our expectations are met as a condition of suppliers doing business with us.

## Our Policies

Since 2016, the REMONDIS Group has set a standard for respecting human rights and fair working conditions across its entire organisation with the release of a global Corporate Compliance Code of Conduct. The 5th business principle 'Respect for human rights and fair working conditions - no compromises', has been instilled globally, and well prior to the Reporting Period.

Prior to the preparation of this statement, we prepared and circulated our Anti-Slavery Policy, which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in our supply chains.

Our Anti-Slavery Policy is also supplemented by our other policies and procedures, including but not limited to:

- Whistleblower Protection Policy;
- Supplier Code of Conduct;
- Corporate Compliance Code of Conduct; and
- REMONDIS Australia Code of Conduct.



### Due Diligence and Questionnaires

As set out in on page 11, we commenced a rigorous review of our suppliers with the goal of ensuring that we are not knowingly procuring or purchasing products or services from suppliers that are suspected or engaged in modern slavery practices.

In terms of analysing key expenditure suppliers, our top suppliers tend to be major organisations that have their own modern slavery measures and initiatives in place, and most of these businesses are required to issue their own modern slavery statement as required under the Act.

For that reason, and for the purposes of this Reporting Period we dedicated our resources to the review and assessment of our smaller suppliers (which are mainly our high risk suppliers). However, we have also been researching and accessing modern slavery statements or ethical sourcing information from those larger suppliers as part of this Reporting Period.

In the next reporting period, the modern slavery due diligence questionnaire will continue to monitor these targeted suppliers or classes of suppliers (particularly in the higher risk categories). Answers to this questionnaire provides us with a greater line of sight of any risk of modern slavery within our suppliers' chain or operations and will enable us to work effectively with any supplier to reduce any modern slavery risks.



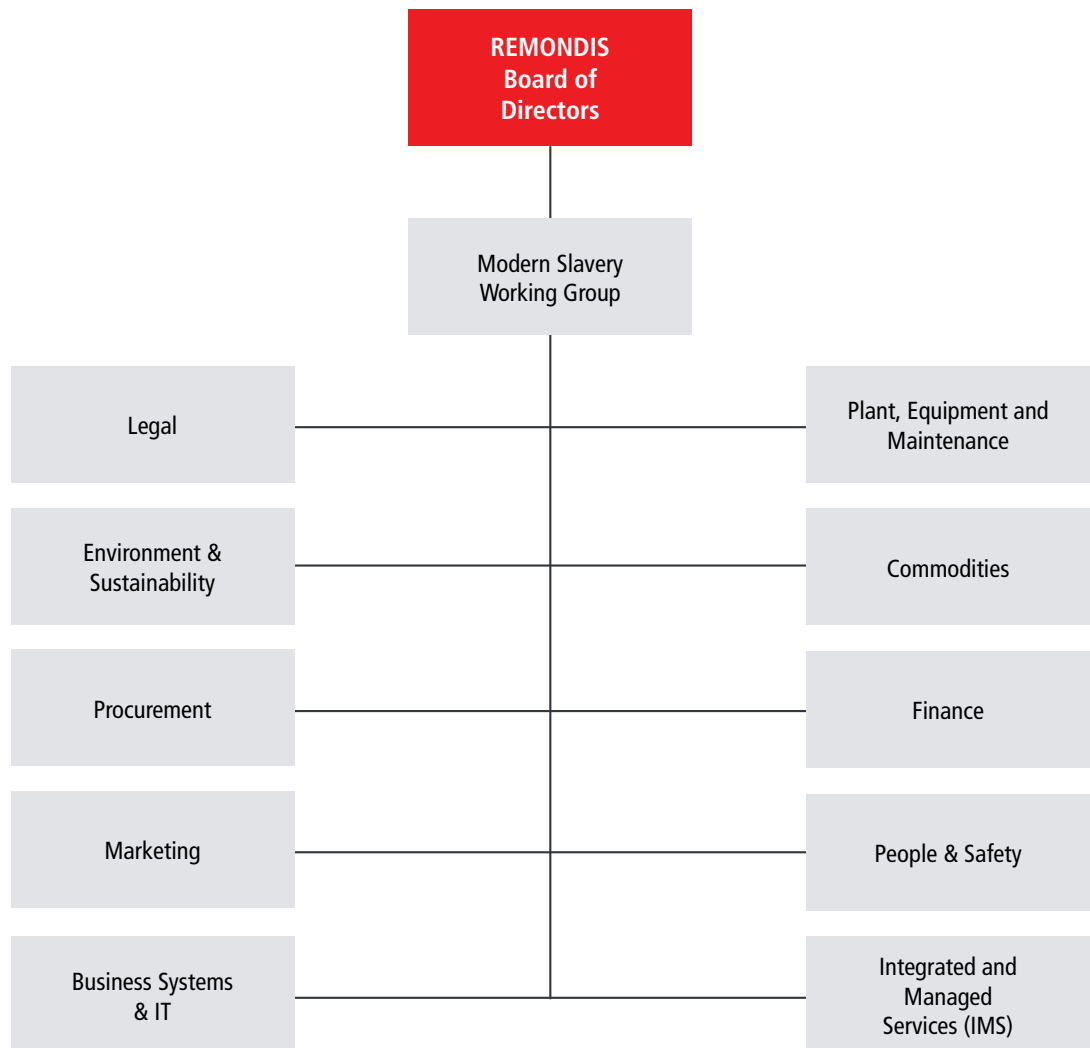
> ACTIONS TO BE TAKEN TO ADDRESS MODERN SLAVERY RISKS

**Modern Slavery Working Group**

We have a dedicated Modern Slavery Working Group that reports to the REMONDIS Board. The group met on a regular basis prior to the preparation of this statement and subsequently will continue to meet on an ongoing quarterly basis, consists of representatives from the business units noted below.

The Modern Slavery Working Group will continue to address and implement our modern slavery action plan.

Our Marketing department will continue to monitor media and news from our sector and relevant industry groups (including the types of products and services we source) to identify emerging human rights risks in various geographic locations, particularly those locations where we may source those products or services, so that we can inform our business (including any suppliers or workers) about current and emerging modern slavery trends or risks.



### Training

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, we prepare and provide training to our workers through employee newsletters, induction programs, awareness training on policy documents, and via seminars and/or presentations to relevant workers. We also require our business partners to provide training to their workers and suppliers and providers. REMONDIS ensures that our workers receive regular training on the broader issues of modern slavery to assist them in:

- appreciating the extent of the problem of modern slavery;
- identifying individuals/business segments which may be at risk from practices of modern slavery; and
- knowing how to respond or report it.



### Reporting Process

During the Reporting Period, REMONDIS has established a revised and updated reporting process for our workers, suppliers, contractors and customers to report or raise any concerns without fear of retaliation regarding unethical or illegal behaviour, including but not limited to any incidents of modern slavery practices.

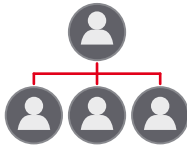




Any worker or supplier who suspects or becomes aware of modern slavery practices at REMONDIS or an organisation that is part of REMONDIS' supply chain is able to raise those concerns with a member of the Legal or People & Safety team, their immediate manager, general manager, a REMONDIS director or report under our Whistleblower Protection Policy, which provides both internal and external reporting mechanisms.

Each reported incident will be investigated and if substantiated, or if otherwise considered appropriate, reported to the Board of REMONDIS.

Reported incidents will be reviewed by the Board to determine the appropriate actions to ensure compliance by REMONDIS with relevant modern slavery laws. The process will include, but is not limited to, steps to resolve or remediate the matter including undertaking further investigations, exercising contractual rights and reporting as required to comply with legal and statutory obligations, and promoting ethical behaviour. The Board may also engage external advisers, consultants or such resources as the Board considers necessary, to assist in investigations or any remediation activities.

# Effectiveness of our Actions in Combating Slavery

REMONDIS recognises the importance of measuring the effectiveness of different actions taken to assess and address modern slavery risks, and has measured the effectiveness of its actions as follows:

Action	Measure of Effectiveness
<p>Senior Management</p> 	<p>Our senior management have taken steps to identify and address modern slavery risks. From the next reporting period, the Modern Slavery Working Group will continue to develop, monitor and improve on the actions already taken by REMONDIS and senior management.</p>
<p>Due Diligence</p> 	<p>Due Diligence supplier questionnaires were issued to selective suppliers within the Reporting Period in each relevant category. The questionnaires required suppliers to provide information about modern slavery risks in their supply chains and the processes in place to address those modern slavery risks. Responses have been received and reviewed by management to develop an appropriate action plan to address any identified modern slavery risks our operations. REMONDIS will continue to undertake due diligence in relation to the operations and supply chains of REMONDIS to identify new or emerging modern slavery risks.</p>
<p>Anti-Slavery Policy and Supplier Code of Conduct</p> 	<p>Prior to the release of this statement, REMONDIS prepared its Supplier Code of Conduct and the Anti-Slavery Policy which provides the foundation for how we identify, assess, address, minimise and mitigate modern slavery risks. Our Anti-Slavery Policy is also supplemented by our other policies, protocols and procedures. The Anti-Slavery Policy is reviewed annually, and suppliers and stakeholders will be updated of relevant changes.</p>
<p>Training and Education</p> 	<p>REMONDIS has modern slavery provisions in all service agreements, supply agreements and service provider and/or consultancy agreements with suppliers to address modern slavery risks. This is an important step to provide REMONDIS with contractual rights to take action or terminate agreements with service providers or suppliers who are found to be engaged (directly or indirectly) in modern slavery practices.</p>
<p>Service and Supplier Contracts</p> 	<p>Labour rights and the working conditions of overseas manufacturers of IT products and services. The majority of REMONDIS software providers have operations in Australia (rather than overseas).</p>



## Response to COVID-19

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

- the novel coronavirus (COVID-19) pandemic did not affect REMONDIS's ability to conduct a risk assessment of our suppliers, complete the actions set out in this statement or prepare this statement;
- we maintained our supplier relationships and fostered open communication with our suppliers and workers about COVID-19 risks;
- we introduced a number of covid specific safety measure into our operations, in an effort to ensure that we would continue to run our essential business services during the COVID-19 pandemic, and prioritised the safety, health and wellbeing of all REMONDIS workers, customers, contractors and the public; and
- we are not aware of the COVID-19 pandemic having caused any additional modern slavery risks in our operations and/or supply chain, as at the date of this statement.



## Moving into 2021

In preparation for the release our second modern slavery, REMONDIS will extend the scope of our supplier review and focus on our identified high-risk areas.

We will collect more detailed information from those suppliers who were the subjects of our previous review via due diligence questionnaires to assist them with improving their knowledge of how to identify risks and prevention of modern slavery practices. We will also continue working with our relevant business units, procurement specialists and suppliers in order assist improving existing procurement processes, and work with each of them to develop new ways to address our modern slavery risks. We may also be seeking opportunities to work with our overseas suppliers and community organisations. This may include assisting suppliers with their modern slavery training.

We will also begin planning on updating our website to include details about our modern slavery and corporate & social responsibility initiatives. Our Modern Slavery Working Group will continue to meet on a regular basis to ensure our action plan milestones are achieved.

After the Reporting Period, REMONDIS published its Sustainability Strategy 2021, setting out our objectives and targets across the environment, social and governance aspects of our business for the 2021 reporting period. REMONDIS' approach to its sustainability goals are aligned with the United Nations Global Compact document, *'Integrating the Sustainable Development Goals into Corporate Reporting: A Practical Guide'*, which recommends reporting against the Sustainability Development Goals (SDG). This and our next modern slavery statement is directly relevant to our priorities of achieving Targets 5.1 and 8.7 as illustrated below:

<p>5 GENDER EQUALITY</p> 	<p><b>Target 5.1.</b> End all forms of discrimination against all women and girls everywhere.</p>
<p>8 DECENT WORK AND ECONOMIC GROWTH</p> 	<p><b>Target 8.7.</b> 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.</p>

# Appendix

This statement was prepared to meet the mandatory reporting criteria set out in the Act. The table below identifies where each criterion is disclosed within the various sections of this statement and/or where more information can be found.

Modern Slavery Act Reporting Criteria	Relevant Section in Modern Slavery Statement
1. Identify the reporting entity	Message from our CEO/Managing Director (p2-3) Our Organisation Structure, Operations and Supply Chains (p6-9)
2. Describe the reporting entity's structure, operations and supply chains	Our Organisation Structure, Operations and Supply Chains (p6-9)
3. Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls	Identified risks of modern slavery practices in our operations and supply chains (p11)
4. Describe any actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Actions taken to address modern slavery risks (p12-15)
5. Describe how the reporting entity assesses the effectiveness of those actions	Effectiveness of our actions taken in combating slavery (p16)
6. Describe how the process of consultation with any entities that the reporting entity owns or controls	Message from our CEO/Managing Director (p2-3)
7. Provide any other relevant information	Our Organisation Structure, Operations and Supply Chains (p6-9) Response to COVID-19 (p17) Moving into 2021 (p18)



WORKING FOR THE FUTURE

REMONDIS is one of the world's largest recycling, service and water companies. The group has branches and associated businesses in more than 30 countries across Europe, Africa, Asia and Australia. With over 30,000 employees, the group serves around 30 million people as well as many thousands of companies. The highest levels of quality. Working for the future.

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