

# Modern Slavery Statement

## FY2023-2024



## Contents

<b>Reporting Criteria .....</b>	<b>1</b>
<b>1. Reporting Entity .....</b>	<b>2</b>
<b>2. Structure, Operations, and Supply Chains .....</b>	<b>3</b>
<b>3. Identifying and Assessing Modern Slavery Risks .....</b>	<b>5</b>
<b>4. Actions Taken to Address Modern Slavery Risks .....</b>	<b>6</b>
<b>5. Effectiveness of Actions Taken .....</b>	<b>7</b>
<b>6. Consultation Process.....</b>	<b>8</b>
<b>Annex 1 .....</b>	<b>9</b>
<b>Related Entities .....</b>	<b>9</b>

## Reporting Criteria

Modern Slavery Reporting Criteria	Relevant Section
1. Identify Reporting Entity	Page 2
2. Describe the reporting entity's structure, operations and supply chains	Page 3-4
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Page 5
4. The actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks	Page 6
5. How the reporting entity assesses the effectiveness of such actions	Page 7
6. The process of consultation with any entities the reporting entity owns or controls or is issuing a joint modern slavery statement with	Page 8
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A

## 1. Reporting Entity

Re.Group PTY LTD ("**Re.Group**")

ACN: 616 439 779

Registered Office: Suite 1, Level 19, 100 Miller Street, North Sydney, NSW 2060

Website: [www.re-group.com](http://www.re-group.com)

### Introduction

This modern slavery statement is made by Re.Group PTY Ltd for its related entities (see annex 1 for full list ("**Related Entities**")) for the financial year ending 2024, pursuant to the requirements of the Modern Slavery Act 2018 (Cth) (the "**Act**"). The statement outlines the steps we have taken to assess and address the risks of modern slavery in our operations and supply chains.

## **2. Structure, Operations, and Supply Chains**

### **Structure**

Re.Group Pty Ltd is a subsidiary of Re.Group Finco Pty Ltd, which is the parent company of multiple entity groups. This includes Re.Cycle Material Recovery Facilities, Re.Grow FOGO Processing, Return-It Container Deposit Schemes (CDS), Re.Collect Container Collection and the groups engineering company, Recycling & Design Technologies (RDT) Engineering (see full list of entities in Annex 1 of this statement). Re.Hold PTY LTD is the ultimate holding company of the group.

### **Operations**

Re.Group operates the largest network of recycling facilities across Australia. Founded in 2013, Re.Group has expanded to deepen the impact of our recycling work around Australia and New Zealand.

Through Re.Cycle, we develop, operate and maintain industry leading material recovery facilities (MRFs) which process 'yellow bin' household collected material across Australia and in New Zealand. Re.Cycle processes kerbside co-mingled waste to recover and effectively extend the life of material into the products such as cardboard, mixed paper, ferrous metals, non-ferrous metals, HDPE, PET plastics and glass. Re.Grow also develops, manages and operates innovative food organics and garden organics processing facilities.

Via Return.IT, we offer a modern and convenient way to collect eligible containers and pay back refund amounts, while embracing both our customers and charity groups as part of the recycling collection system. We are the network operator for the ACT CDS, collecting containers in the nation's capital, the major operator in the Queensland Container Refund Scheme (CRS), have a number of points in NSW and since 2023 have been one of the network operators of the CDS Victoria operating refund points in the Southern Melbourne and Gippsland regions. Through Re.Collect, we provide an option for individuals to book a pickup, have their rubbish picked up and get their refunds back all from one place.

RDT is our in-house design and engineering team focused on developing new resource recovery facilities across Australia and New Zealand, as well as upgrades and enhancements to existing recycling infrastructure. RDT specialises in adapting leading international recycling equipment and services to suit local Australian and New Zealand installations.

## Supply Chain

Re.Group's and its Related Entities' supply chain involves the procurement of various goods and services crucial for recycling and resource recovery operations. This includes but is not limited to purchasing equipment such as conveyors, balers, mobile plant machinery, along with safety and personal protective equipment for employees. Re.Group and its Related Entities also source materials for office operations and engages services like waste management consulting, maintenance and IT support. Re.Group sources goods and services both in Australia and internationally.

### **3. Identifying and Assessing Modern Slavery Risks**

Re.Group and its Related Entities acknowledge that modern slavery is a global issue and that it exists in many supply chains. Re.Group has a zero-tolerance approach to modern slavery.

Re.Group's operations are carried out in Australia and New Zealand only. Its direct employees and the direct employees of its Related Entities are based in these countries and receive a contract of employment. Our recruitment and HR processes include reviews of any potential employees' eligibility to work in Australia or New Zealand (as applicable). Employees are paid fair wages that meet or exceed legal minimum wage standards and other applicable regulatory assessments. Fair working conditions are provided in accordance with relevant local laws. If we engage employment agencies, such engagement is governed by a contractual relationship. Re.Group's operations do not extend to other countries where the risk of slavery may be higher. Re.Group's assessment of modern slavery in its operations is low.

Re.Group identifies risks of modern slavery in its first-tier supply chain through its procurement process. Re.Group and its Related Entities sources goods and services both from within Australia and internationally. Re.Group and its Related Entities recognises that the risk of modern slavery is present in any supply chain. Current control measures, to place lower risk on the exploitation of modern slavery in our first-tier supply chain, are set out in section 4 of this statement.

We are currently reviewing our processes and protocols for identifying and assessing modern slavery risks within our supply chain, see section 5 of this statement for further details.

## **4. Actions Taken to Address Modern Slavery Risks**

Re.Group and its Related Entities have taken actions to address and mitigate the risks of modern slavery, including:

- 1. Procurement and Contractual Arrangements:** We expect our suppliers to comply with all laws in the provision of the goods or services. Where possible, we rely on contractual clauses and representations from our suppliers in this regard.
- 2. HR policies:** We are in the initial stages of implementing a human rights and modern slavery policy to help prevent, detect and respond with mitigating controls to the risk of Modern Slavery occurring within Re.Group. As part of this policy, we are reviewing our procedures and processes to further reduce risk of modern slavery in our supply chain.
- 3. Corporate Social Responsibility:** Our mission, values and code of conduct work together to define the way Re.Group manages its business and demonstrates our commitment to high ethical standards and behaviours. Additionally, Re.Group partners with charities, NGO's and industry groups to remain aligned with best practices in corporate social responsibility.
- 4. Employee Accountability Standards:** Our employees are guided by our values and code of conduct to ensure they conduct themselves and our business operations ethically, fairly and safely. Our code of conduct sets out that employees must comply with all applicable Australian (or New Zealand, as applicable) laws and regulations.

## **5. Effectiveness of Actions Taken**

We will assess and monitor the procedures that we have in place to mitigate the risks of modern slavery and human trafficking, such assessments shall include:

- Obtaining and evaluating feedback from our suppliers on their practices and compliance;
- Obtaining details of the actions taken by the supplier to manage and address modern slavery risks in their supply chain; and
- Administering breaches of contractual arrangements through the breach provisions of each contract.

### **Future Action**

In the future reporting periods, we aim to further enhance our policies and procedures, such initiatives include:

- Refining our procurement process to include more granular information and declarations in relation to the supply chain of our key suppliers.
- Enhancing our risk assessment tools to better identify and mitigate risks.
- Implement ongoing monitoring and auditing processes to ensure that our suppliers remain compliant with modern slavery standards.
- Implement training across the management teams of Re.Group and its Related Entities to understand what modern slavery is and how to mitigate it.



## **6. Consultation Process**

This statement has been approved by the board of directors and has been reviewed by senior management of Re.Group Pty LTD and its Related Entities detailed in Annex 1. It applies to the activities of Re.Group and its Related Entities detailed in Annex 1.

### **Approval**

This statement has been approved by the Board of Directors of Re.Group Pty LTD and its Related Entities detailed in Annex 1 on 3 March 2025.

### **Signed**

A handwritten signature in black ink, appearing to read 'David Singh', with a stylized flourish at the end.

**David Singh**

**Managing Director of Re.Group Pty Ltd and its Related Entities detailed in Annex 1**

Date: 13 May 2025

## Annex 1

### Related Entities

- Re.Group Finco Pty Ltd, ACN 616 417 488
- Re.Operate Pty Ltd, ACN 607 358 538
- Re.Cover Resources Pty Ltd, ACN 615 947 521
- Re.Fuel Group Pty Ltd, ACN 607 358 467
- Re.Turn It Pty Ltd, ACN 615 434 869
- Re.Group Pty Ltd, ACN 616 439 779
- Re.Invest Group Pty Ltd, ACN 607 358 369
- Re.Invest MRF Pty Ltd, ACN 607 358 609
- Re.Energy Pty Ltd, ACN 607 358 510
- Re.Cycle (Browns Plains) Pty Ltd, ACN 624 014 991
- Re.Cycle Operations (Mackay) Pty Ltd, ACN 602 778 147
- Re.Cycle (Townsville) Pty Ltd, ACN 614195505
- Re.Cycle Operations (Townsville) Pty Ltd, ACN 614195050
- Re.Cycle (Canberra) Pty Ltd, ACN 610 093 788
- Re.Cycle Operations (Canberra) Pty Ltd, ACN 610 379 078
- RDT Engineering Pty Ltd, ACN 108 273 981
- Re.Grow Pty Ltd, ACN 607 367 297
- Re.Grow (Shellharbour) Pty Ltd, ACN 613 887 899
- Re.Grow Operations (Shellharbour) Pty Ltd, ACN 620 045 098
- Re.Turn It (Canberra) Pty Ltd, ACN 623 237 687
- Re.Turn It (Canberra) Operations Pty Ltd, ACN 626 032 282
- Re.Turn It (Canberra) Depot Pty Ltd, ACN 626 032 522
- Re.TurnIt (Canberra) Collection Points PTY Limited, ACN 626 032 540
- Re.Turn It IT Co Pty Ltd, ACN 626 032 531
- Re.Turn IT Collect PTY LTD, ACN 626 032 291
- Re.Turn It (Queanbeyan) Pty Ltd, ACN 623 237 874
- Re.Turn It (Brisbane) Pty Ltd, ACN 627 480 353
- Re.Turn It (Queensland) Depot Pty Ltd, ACN 628 408 882
- Re.Turn It (WA CDS), ACN 630 323 769
- Re.Turn It (Victoria) Pty Ltd, ACN 664 532 325
- Re.Turn It (Victoria) Collection Points, ACN 666 187 033
- Re.Cycle (Adelaide) Pty Ltd, ACN 616 663 542
- Re.Cycle (Sunshine Coast) Pty Ltd, ACN 654 534 237
- Re.Cycle Operations Pty Ltd, ACN 656 197 134
- Re.Cycle Holdings Pty Ltd, ACN 656 196 244
- Re.Cycle (Auckland) Pty Ltd, 8528726; NZBN: 9429050972289
- Re.Hold Pty Ltd, ACN 616 411 217