



**Modern
Slavery
Statement
FY'24**



MODERN SLAVERY STATEMENT FY'24

This Modern Slavery Statement (“MSS”) relates to the reporting period of 1 July 2023 to 30 June 2024 and made pursuant to the Modern Slavery Act 2018 (Cth) (“the Act”) by J.J. Richards & Sons Pty Ltd (ACN 000 805 425) (“JJR”) in respect of JJR and its wholly owned and controlled subsidiary entities (“together referred to as we, us, our, the JJR Group”). Since the last financial year, the JJR Group has continued to monitor and identify modern slavery risks in its operations and have implemented processes to mitigate same. We herein identify these risks and actions taken.

Our Structure

JJR is an Australian waste management organisation with over 2,700 employees and is a privately owned company incorporated in Australia. Our corporate head office is located at 3 Grant Street, Cleveland, Queensland. The JJR Group comprises the following entities:



Aztech Services Australia Pty Ltd
(ASA)



In Vitro Technologies Pty Ltd
(IVT)



J.J. Richards Engineering Pty Ltd
(JJRE)



Southern Oil Collections Pty Ltd
(SOC)



Our Business

J.J. Richards & Sons Pty Ltd is a proudly Australian owned and operated family business that has been providing innovative waste management services solutions throughout Australia since 1932. The JJR Group as a whole provides a diverse range of goods and services globally.



JJR and SOC performs a variety of solid, hazardous and liquid waste collection services, domestic garbage, recycling, sanitary and green waste collection services, including an extensive range of commercial customers.

JJR performs domestic waste, recycling, sanitary and green waste collection services under contract for 63 local authorities throughout Eastern Australia. This equates to more than 2.5 million wheelie bin collections every week!

We also understand that education and training play a large part in the ongoing success of waste management programs. It is for this reason that JJR has developed an independent consulting division, EnviroCom Australia, which has the expertise and experience to develop environmental management programs and education packages specific to customer needs and requirements. EnviroCom Australia has the ability to assist in the development of education strategies. For more information, visit the [EnviroCom Australia Website](#).



In Vitro Technologies has developed a reputation for being one of the most dynamic and successful companies in the Australian scientific, diagnostic, medical consumables and equipment.

IVT consists of five major Business Units focused on providing our customers with the highest quality products and services in the areas of:

- Industrial Science;
- Life Science;
- Diagnostics;
- Womens and Children's; and
- Infection Control.



JJRE provide various construction services. JJR vehicles are designed and purpose built by JJRE. In addition, all vehicles are required to undergo a comprehensive maintenance schedule to ensure a safe, environmentally friendly and well-presented fleet throughout the life of the contract.



ASA provides hazardous material remediation services such as asbestos removal to many facilities throughout Australia, including; factories, hospitals, universities, retail organisations and high-rise buildings.

Commercial remediation projects often present very specific challenges, generally around minimising disruption to the facility and workforce.

ASA understand the adverse effect that hazardous materials like asbestos can have on your workplace. Our experienced project management staff can assist with planning major works or reacting to Emergency Response works.

ASA currently employ over 100 A Class Technicians, 25 Nominated A Class Asbestos Supervisors, experienced Lead and Mould Technicians, who work with a highly experienced Management and Administration Team.



Our Supply Chain

The JJR Group supply chain includes providers of the following goods and services:

- Accommodation;
- Administration Services;
- Repair and Maintenance;
- Builders;
- Cleaners;
- Hire Equipment;
- Information Technology Services;
- Insurance;
- Labour Hire;
- Mail Services
- Medical Professionals;
- Professional Consulting Services;
- Recruitment;
- Removalists, Transporters;
- Security Services;
- Trucks, Vehicles, Wheeled Plant, Equipment;
- Fuel and Gas Suppliers;
- Technical Specialists; and
- Waste Collection/Haulage Organisations.

Our Modern Slavery Risks

Since the last financial year, we have conducted further investigations to identify the risks of modern slavery in our overarching operations and supply chains. This was completed having regard and giving due consideration to the principles provided in the relevant guidance material.

The JJR Group acknowledges the importance of continually monitoring our supply chains and reviewing the categories previously reported to ensure that our assessment of modern slavery risks across our entities remain up to date. During this year's review, we have identified three new categories of suppliers and subcontractors who provide products or conduct services for the JJR Group who may be at a higher risk of modern slavery occurring in their supply chain:

- Hire Equipment – Manned;
- On site Non-Trade Qualified Subcontractors; and
- Technical Specialists i.e. hygienists.

The above categories of suppliers are specific to ASA which provides hazardous material remediation services. Due to the high-risk nature and environment of ASA's operations and projects, the JJR Group recognises the heightened potential for modern slavery to occur within the above supply chains.

Our previously reported-on categories of suppliers and subcontractors at higher risk of modern slavery occurring in their supply chain are repeated below:

- Companies (non-trade qualified) undertaking building maintenance on our sites – e.g. office cleaning, garden/yard maintenance;
- Companies (trade qualified) undertaking building maintenance on the JJR Group's sites – e.g. electricians, plumbers, carpenters, roofers;
- Cleaning and detailing (non-trade qualified) of JJR vehicles – companies and/or professionals undertaking cleaning and detailing services of JJR vehicles;
- Information Technology (I.T.) services; and
- Labour Hire services.

How we address these risks

We have a zero-tolerance approach to modern slavery and commitment to reducing the risks of same in our supply chain. The JJR Group acknowledges the importance of having practical protocols to underpin our compliance with the Act.

We are dedicated to providing an environment which enables us to monitor, manage and report on modern slavery in a way which ensures accountability and transparency across our entire corporate structure. As such, the JJR Group has implemented a multi-faceted approach to managing the risks of modern slavery in our operations including:

- A Whistle-blower Policy which can be used by internal and external stakeholders accessible on our website [here](#);
- Employment and Industrial Relations Policy;
- A due diligence program in relation to engaging with suppliers wherein high-risk suppliers are required to attest to having adequate protocols in place to respond to the risks of Modern Slavery; and
- Training and instruction of and to relevant staff.

Assessing the effectiveness of our actions

Overall, we are continually monitoring our risk profile. The JJR Group have effective controls in place to ensure compliance with the Act – which we consider to be imperative in upholding our Company Values which define the way we do things and the way we treat others.

We believe in the following guiding values:

- Safety and Environmental compliance and best practice management;
- Honesty;
- Integrity;
- Respect;
- Humility;
- Compassion;
- Reliability;
- Quality;
- Innovation; and
- Work/ life balance.

We expect the same from our supply chain and as such, the above guides us in who we do business with.

We continue to assess the effectiveness of our actions and compliance with the Act, through:

- a. Reviewing case law and monitoring industry briefings on supply chain and modern slavery matters;
- b. The establishment of a regular review process around our response; and
- c. Regularly checking our risk assessment processes to ensure that they remain up-to date.

By undertaking the above review, the JJR Group ensures our operations and supply chain are continually evaluated and assessed to ensure they align with our Company Values and other policies and procedures in which our organisation is governed by.

A review of our Modern Slavery response 2024

Since the submission of the JJR Group's fourth MMS for the 2023 Financial Year, we have proactively assessed and reviewed our risk management processes to ensure that our compliance with the Act remains up-to-date.

In our last MMS, we foreshadowed the introduction of a more stringent contractor management system which is intended to provide greater transparency in our supply chain. The JJR Group have since gone live with its Donesafe Contractor Management module which is our updated system used when managing and engaging suppliers to provide goods and/or services for the company. The Donesafe system is administered by JJ's Shared Services team based in our Head Office in Queensland and ASA's Underwood office – these teams add and approve our vendors centrally and ensure that contractors satisfy a set of minimum requirements prior to being permitted to perform work for the JJR Group. These requirements include demonstrating alignment with the core elements of our prequalification assessment and complying with a set of health and safety deliverables prior to mobilisation, and during their course of engagement.

Other updates by the JJR Group are noted below:

- a. We are developing a new people management and engagement platform which is intended to roll out by the end of the current financial year;
- b. We have considerably reduced the use of Labour Hire arrangements. To this extent, these arrangements are only utilised as a last resort;
- c. We have continued to refine our people management systems, including a review of our strategy and policy;
- d. Review our Modern Slavery Declaration which requires our high-risk suppliers to attest to compliance with the Act – in that review it was identified that no changes were required. Our high-risk suppliers are prompted through our newly updated contractor management system to re-review and submit the declaration once annually. Since its introduction (and previous contractor system), no suspected or reported breaches of the Act have been identified by our suppliers;
- e. Reviewed our contracts –
 - (i) The JJR Group have not been notified of any occurrences whereby our suppliers were reluctant to accept minimum contractual requirements relating to modern slavery since the updates to our contracts were introduced after the first MMS.
 - (ii) Further, the JJR Group have developed a Modern Slavery compliance clause to be inserted into Contractor Agreements to ensure contractors attest to compliance with requirements under the Act. Since this introduction into Contractor Agreements, similar to the above, the JJR Group have not been notified of any reluctance to minimum contractual requirements relating to modern slavery; and
- f. Continued analysis of our supply chain by reviewing and identifying any necessary amendments to our categorised high-risk suppliers. As noted earlier, the review by our Legal team recognised three new categories of suppliers utilised by ASA's operations which we identified as having a higher risk of modern slavery occurring within their supply chain, and have since been incorporated into our Donesafe platform; and
- g. Since our first MSS, we have received no complaints / enquiries / information to suggest that modern slavery has been identified in our supply chain.

How are we continuously improving?

The JJR Group are committed to the continual improvement of addressing modern slavery risks through its operations and supply chains. Through our identified actions defined above, we will continue to assess the effectiveness of same each financial year.

How did we consult on this statement?

Our associated entities for the most part share Company Officers and have the same corporate system and advisory staff. This statement has been approved by the Board of Directors of J.J. Richards & Sons Pty Ltd on 20 August 2024.



John Richards
CEO - J.J. Richards & Sons Pty Ltd.



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Waste &
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www.jjswaste.com.au