

Modern Slavery Statement

31 December 2020

Introduction & determination of the reporting entity:

CCP VI VG Holdings Pty Ltd (ACN 630 151 530) “Holdings”, and its subsidiaries below, have registered offices at 95 Greens Road, Dandenong South, Victoria, 3175:

- Oceania Glass Pty Ltd (ACN 630 152 206) “Oceania Glass”
- CRESCENT VI VG PROPCO Pty Ltd (ACN 634 488 181)

The operational activities of Holdings and its subsidiaries are conducted through Oceania Glass. Oceania Glass is deemed a Reporting Entity under section 5.1 of the ‘Modern Slavery Act 2018’ (‘the Act’). Oceania Glass makes this statement under section 13 of the Act.

Description of Oceania Glass’s activities:

Oceania Glass is a resident float glass manufacturer and a national distributor of float glass and laminate products across Australia and New Zealand. Oceania Glass employees approximately 234 people.

- **Manufacturing:** Oceania Glass manufactures approximately 155k tonnes of raw float glass at its Dandenong South, VIC plant. Most raw materials are sourced locally and specifically include sand (60% by weight) and dolomite (19% by weight). Oceania uses other raw materials that originate from foreign sources although the largest of these, soda ash (19% by weight) is purchased locally. Other raw materials required for the conversion process include methane and industrial gasses, the bulk of which are sourced locally.
- **Distribution:** Oceania Glass operates six proprietary warehouses across Australia with capacity of approximately 50,000 square metres. The warehouses are used for the storage of its own glass and laminates but also for storage of imported glass and laminates. Oceania glass imports approximately 8.5% of the tonnage it sells. The bulk of this glass comes from the following countries:
 - China – 49%
 - India – 28%
 - Turkey – 7%
 - USA – 7%
 - Other – 9%

Risk of Modern Slavery existing with operations and supply chain:

Oceania Glass deems Modern Slavery practices as the enslavement of vulnerable people whose freedom is impacted by exploitation including threats, violence and coercion, abuse of power or deception. The following examples pose risks in respect of the existence of Modern Slavery.

Employees: Oceania Glass's manufacturing operation runs on a '24/7' cycle with 'glass workers' oscillating between shifts across days, afternoons and evenings. Such a situation poses a risk that staff may experience Modern Slavery and not have active supervision or otherwise ready access to senior management to highlight the matter.

Suppliers: Oceania Glass annually procures goods and services from approximately 300 suppliers. Assessing these suppliers, over 130 provide goods and services over A\$50,000. Moreover, several of Oceania Glass's suppliers are based abroad, which limits our ability for direct and frequent observation of their activities. Oceania Glass has identified risks with certain local and international suppliers and will look to formally assess their Modern Slavery positions through a questionnaire-based report at first instance.

Actions taken to assess and address modern slavery risks:

Oceania Glass understands that Modern Slavery in the context of business is a complex and global problem transpiring in various forms. Oceania Glass will actively look to identify and address Modern Slavery across its suppliers and employees as follows:

1. Design policy systems to detail how Modern Slavery may exist within operations.
2. Implementation of policies and practices to establish expectations in respect of staff conduct.
3. Monitor for the existence of Modern Slavery within the supplier network via periodic survey.
4. Remediate instances through supplier consultation and staff training.

In response to the risk of Modern Slavery discussed above, Oceania Glass has developed various policies and actions to address operational risk that may be exposed in respect of Modern Slavery practices:

1. Establishment of an '**Anti-Slavery Policy**' to establish and signify its position in respect of Modern Slavery to employees, suppliers and other stakeholders:

<http://www.oceanialoglass.com.au/company-oceania-glass/company-policies/anti-slavery-policy/>

2. Developed an employee **Code of Conduct** that defines behaviours expected of employees, including the address of 'Human Rights' across employees and our supply chains. All employees are required to read and acknowledge (sign) the code of conduct within 2-months of commencement and thereafter annually.
3. Implemented a **Whistle-blower Policy** with full anonymity and protection afforded to the employee making the report.
4. Implementation of a **Procurement Policy** that includes a supplier questionnaire to assess the risk of Modern Slavery existing within the supply chain. The questionnaire will eventually be provided to all suppliers with annual supply of over A\$50,000,

Assessing the effectiveness of the actions taken:

The effectiveness of the actions taken to date are as follows:

- Oceania Glass is actively promoting the code of conduct across the organisation and making request for employees to read and acknowledge the behavioural expectations.
- Oceania Glass receives 'whistle-blower' feedback from staff and formally follows up on all cases.
- Supplier questionnaires have recently been issued across the supplier base and while some have been returned, Oceania Glass will establish a working team to assess these responses and address matters with the suppliers in question.

Looking forward:

Oceania Glass will establish an Anti-Slavery Working Group and set the following priorities for the Year Ended March 2021:

- Policy review: Review the current policy framework to ensure it meets best practice in respect of Modern Slavery identification and avenues for reporting.
- Training: Deliver Modern Slavery training to all procurement staff to increase capability and ensure:
 - They understand Modern Slavery as it applies within the workplace.
 - They can assist suppliers in building their capabilities.
- Engagement: Engage with employees and suppliers to ensure they understand their requirements and assist them through the process to build capabilities.
- Assurance: Review the current assurance process to ensure it meets best practice.



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This statement is made pursuant to the Act and constitutes Oceania Glass's Modern Slavery statement in respect of the 31 March 2020 financial year and is approved by the principal governing body of Oceania Glass Pty Ltd, being its board of directors.

A handwritten signature in black ink, appearing to read "Corne Kritzinger".

Signed: Corne KRITZNGER
Position: Chief Executive Officer, Oceania Glass Pty Limited

