



**O'BRIEN®
MODERN SLAVERY
STATEMENT 2020**



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1. INTRODUCTION

For over 96 years, O'Brien® has built a reputation with Australian consumers and businesses based on integrity and trust. These qualities have been a driving force behind our approach to all aspects of our business for many years. Our purpose is to make a difference by demonstrating real care for our customers, our people, and the communities we operate in including our employees, subcontractors, and suppliers throughout our supply chain. We strive to be a safety leader in our industry, a world-class operator, a good corporate citizen, and a great employer. We care about the impact of our decisions - whether large or small - on those around us. This includes impacts on human rights.

Modern slavery refers to cases of human exploitation where the victim cannot refuse or leave. It is a hidden crime that impacts the livelihood of people and unfortunately as history shows us, can be found in all supply chains. At O'Brien®, our purpose and values go hand in hand with a commitment to identify, prevent, mitigate and remediate modern slavery in our operations and supply chain.

We are committed to playing our role in supporting the eradication of all forms of modern slavery. This commitment is laid out in our company's Modern Slavery Policy which establishes zero-tolerance to modern slavery, our Supplier Code of Conduct and Our Way of Working, which sets out our expectations for behaviour and ethical standards from our employees, suppliers and subcontractors. Furthermore, our parent company Belron®, is signatory to the UN Global Compact and with its support, we manage our operations and supply chains in line with the UN Guiding Principles on Business and Human Rights.

This is the first modern slavery statement for the O'Brien® Group and outlines the actions we have taken to understand the modern slavery risks in our operations and supply chains and the approach we will take to prevent, mitigate and remediate modern slavery and human trafficking in our operations and supply chains.



Peter Lumsdaine

CEO and Managing Director - O'Brien® Group

About this Statement

Belron Australia Pty Limited and its related entities (O'Brien®, or the O'Brien® Group) has prepared this modern Slavery statement (Statement) as a joint statement in compliance with the Modern Slavery Act 2018 (Cth) (the Act).

The reporting entity, Belron Australia Pty Limited, is a large proprietary company, which is wholly owned by Belron International Limited (BIL), the world's leading vehicle glass repair and replacement company. BIL's major shareholder is D'leteren, a listed company on the Euronext in Brussels.

This Statement covers Belron Australia Pty Ltd (the Australian holding company in the O'Brien® Group) and all of its subsidiaries including the following operating entities:

- O'Brien Glass Holdings Pty Ltd ABN 47 002 909 917
- O'Brien Group Services Pty Ltd ABN 74 132 161 285
- O'Brien Glass Industries Limited ABN 74 00 022 275
- Laser Group Management Pty Ltd ABN 64 145 449387
- Australian Autoglass Pty Ltd ABN 63 000 385 197
- O'Brien Australia Pty Ltd ACN 604 587 206
- O'Brien Glass Operations Pty Ltd ABN 97 604 409 225

This statement covers the reporting period 1 January 2020 to 31 December 2020 (Reporting Period) and has been prepared to meet the mandatory criteria structure as outlined in the Guidance for Reporting Entities: Commonwealth Modern Slavery Act 2018.

The O'Brien® Group employs approximately 1,029 people¹. O'Brien® operates solely in Australia and is headquartered in Padstow, New South Wales.

¹ As at 31 December 2020

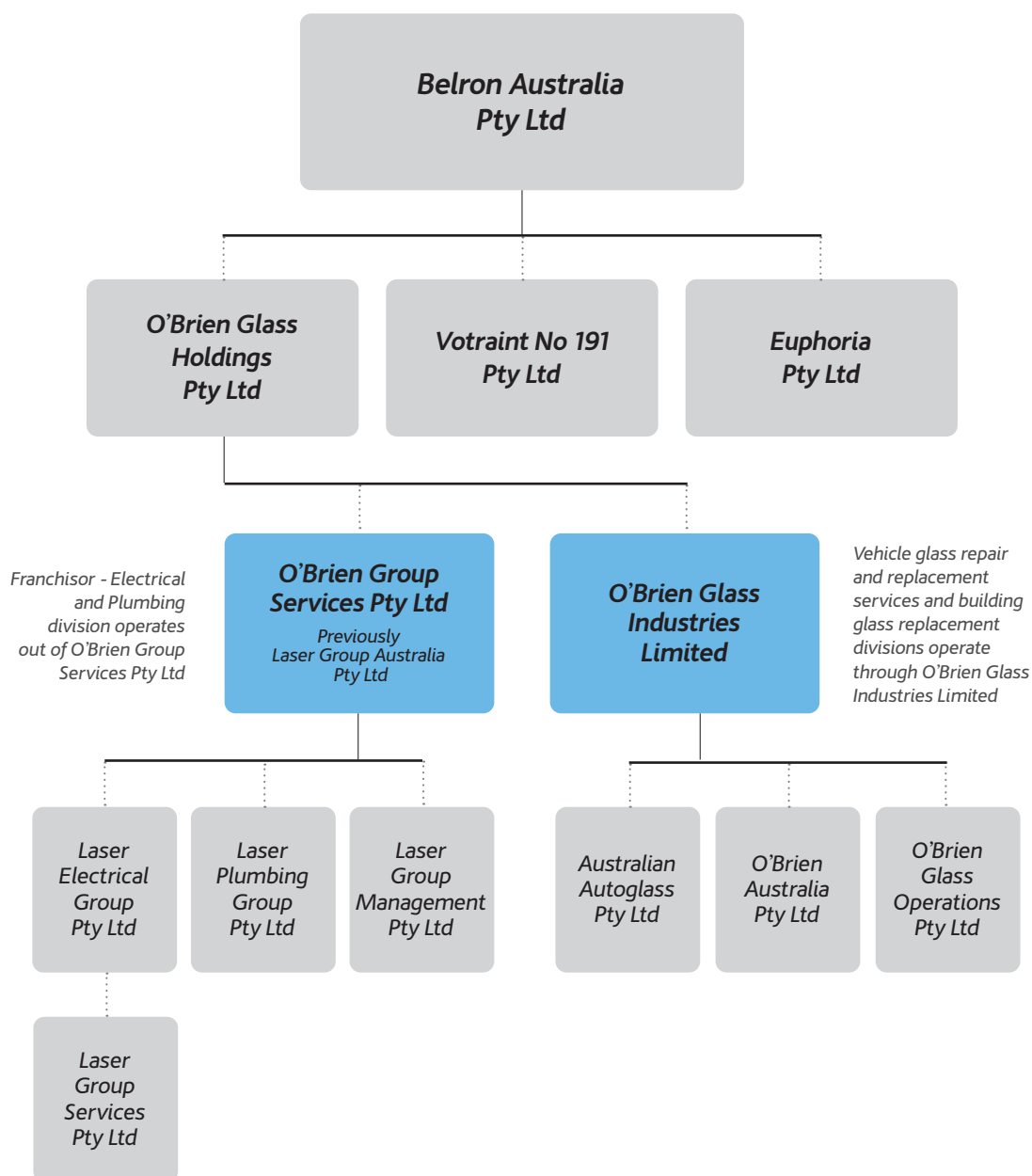


Figure 1 - Corporate structure of the O'Brien® Group*

* All entities are owned 100% within the O'Brien® Group

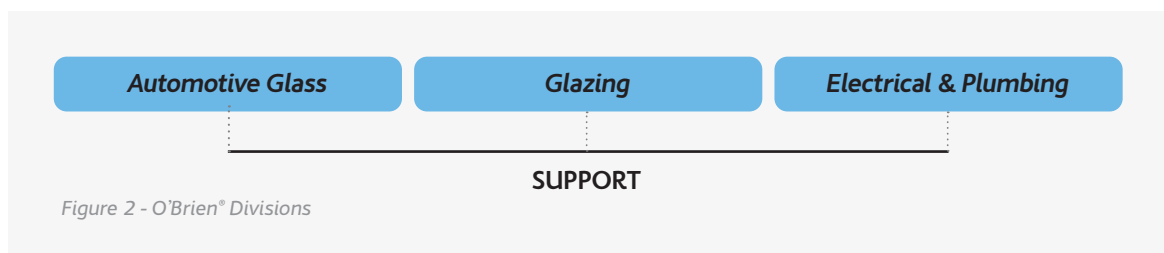
2. STRUCTURE, OPERATIONS, AND SUPPLY CHAIN

2.1. Structure

O'Brien® has three distinct business divisions and service offerings:

- a) Automotive glass
- b) Glazing
- c) Electrical & Plumbing

These three divisions are supported by a centralised support team, including a customer care team with 150 seat call centre located in Australia.



2.2. Operations

O'Brien® operates across Australia with an approximate annual revenue of \$240 million.

As at 31 December 2020, O'Brien® had approximately 1,029 employees and operated across 71 sites and locations. The majority of our employees are permanent with 10.5% either fixed term contractors or casual.

Our operational activities can be divided in the three divisions plus the operational division of property and shared services.

- Automotive glass division: the provision of services is the repair, replacement of vehicle glass and associated recalibration services. This also includes the required operations to achieve that, such as importing of vehicle glass and ancillary products and distribution centres around Australia. The services are provided through our employees and approximately 80 subcontractors who are licensed to provide these services under the O'Brien® brand in regional Australia.
- Glazing division: the replacement of glass in homes and buildings and related quality assurance audits. This includes the required operations to achieve that, such as importing of glass and ancillary products. The services are provided through our employees and our network of over 400 non-branded glazing subcontractors.
- Electrical & Plumbing division: this is our newest division commencing in 2018. Over 150 electrical and plumbing franchisee businesses, estimated to employ over 1,000 people and which provide electrical and plumbing services to Australian homes and businesses.
- Support services: activities include the everyday operations of corporate offices and all the support for the other three divisions including a contact centre based in New South Wales with 150 seats, executive, HR, finance, IT, procurement, legal, sales, marketing and central administration functions.

2.3. Supply chains

In 2019, O'Brien® spent \$144 million across 40 procurement categories with over 4,000 suppliers. While the majority of the suppliers are located in Australia, the largest spend is from suppliers in Asia.

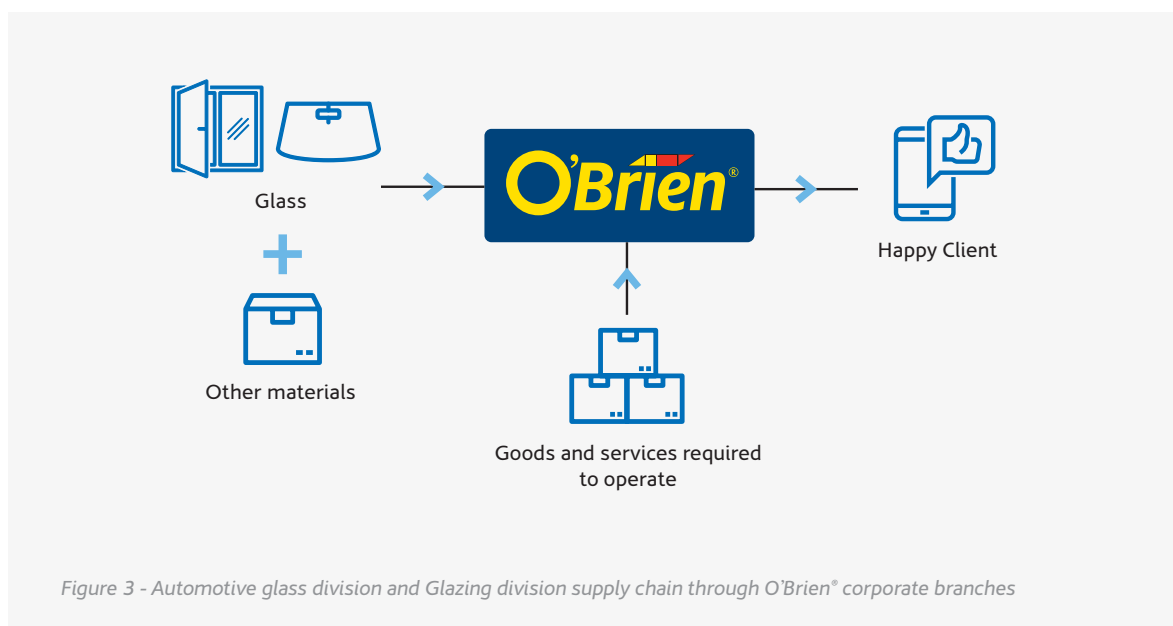
Our suppliers can be split into 3 main categories:

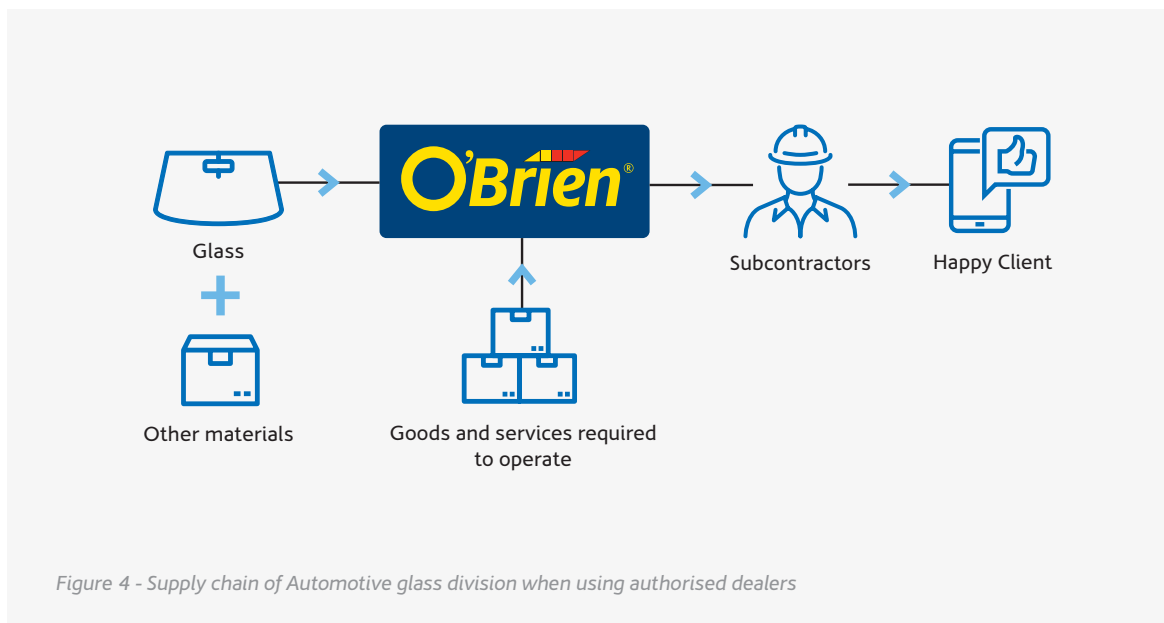
- Subcontractors: Australian suppliers that perform specific skilled jobs with an Australian workforce for the different O'Brien® divisions - they are usually smaller suppliers with short term contracts.
- Suppliers shared with Belron®: Our largest suppliers of materials based on spend which are usually located in China. They are shared with our parent company and are audited by us and Belron®.
- Other suppliers: Australian and international suppliers. They are specific to O'Brien® with the majority of them being engaged on a long-term basis, with some one-off transactions.

The majority of these suppliers fall into one of the following procurement categories:

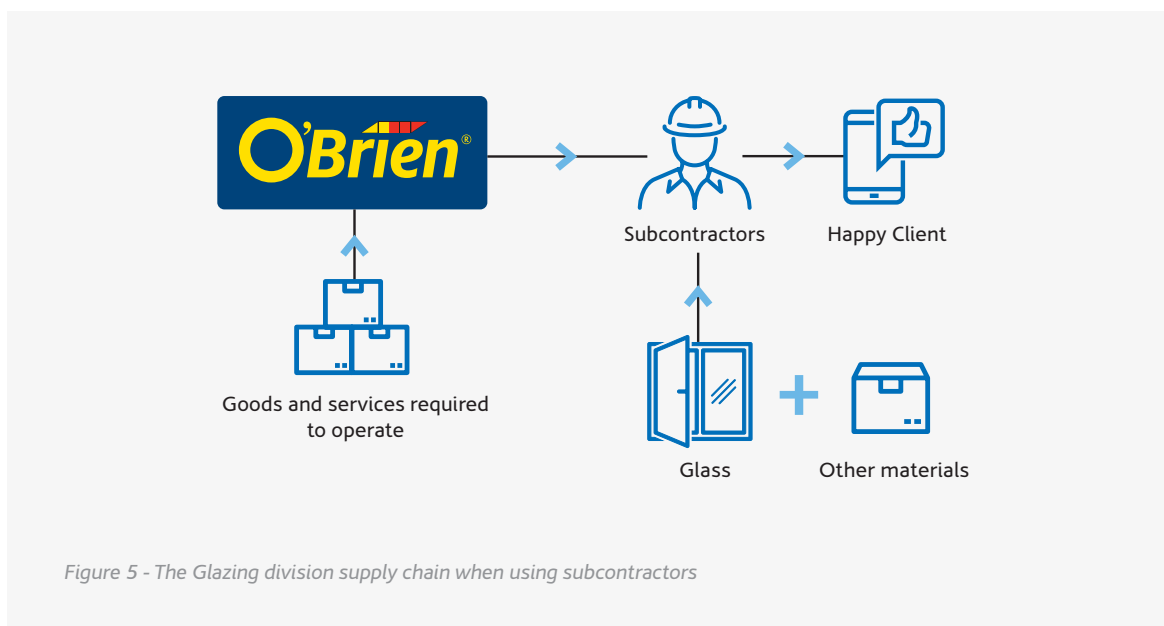
- | | |
|---------------------------|------------------------------------|
| ▪ Glass supplies | ▪ Professional services |
| ▪ Other glazing materials | ▪ Waste management |
| ▪ Freight and shipping | ▪ Utilities |
| ▪ Office supplies | ▪ Labour hire |
| ▪ Subcontractors | ▪ Clothing and uniforms |
| ▪ IT services | ▪ Cleaning services |
| ▪ Motor vehicles | ▪ Marketing materials and services |

The O'Brien® supply chain can be divided into two core areas of direct business: the first and our biggest business is the Automotive glass division. Figure 3 shows our supply chain when we provide services directly and Figure 4 demonstrates the supply chain of our authorised dealers. For this we procure glass directly and from our shared suppliers with Belron®.





The second core area of direct business is the Glazing division. Figure 3 shows the supply chain when providing services directly and Figure 5 shows supply chain through our subcontractors. In the Glazing division we procure glass from international and national suppliers.



3. MODERN SLAVERY RISK AREAS IN OPERATIONS AND SUPPLY CHAIN

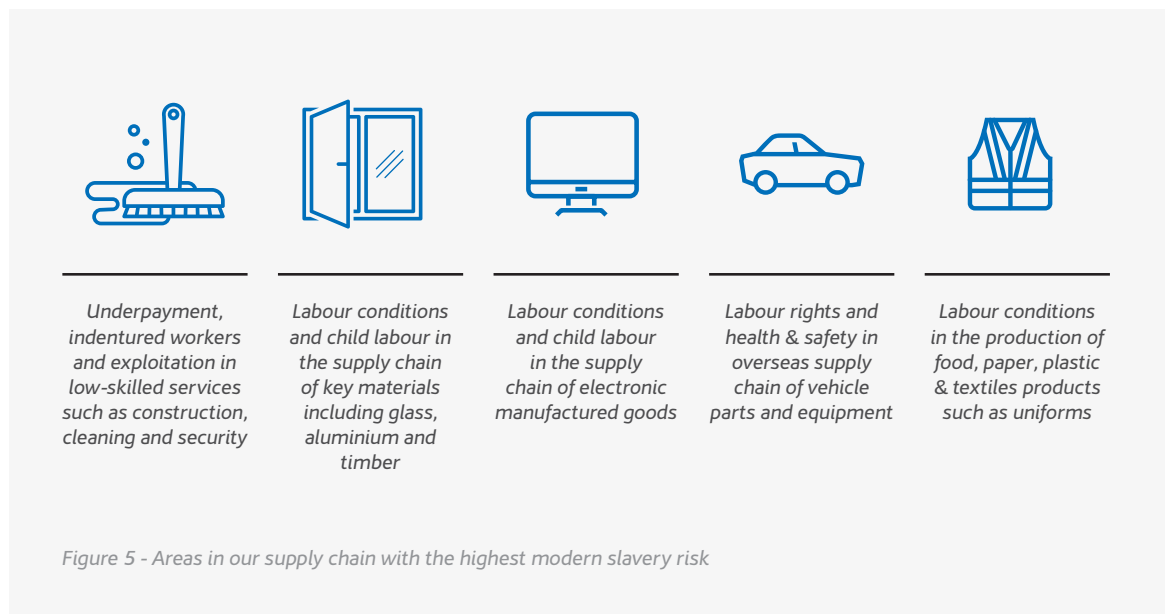
O'Brien® has evaluated the inherent modern slavery risks to the people within our supply chains based on:

- Industry
- Geographical area
- Their policies and procedures

To assess the level and location of risk within our supply chains and operations, we engaged the sustainability consultancy Edge Environment to undertake a social risk assessment.

The risk assessment method relied on market models that trace commodities and services across supply chains. This means that the modern slavery risk rating of our procurement reflects not only the generic risk of first tier suppliers, but also second and third tier suppliers that exist upstream of those first-tier suppliers. The assessment analysed our 40 procurement categories based on risk of child labour, forced labour, wage assessment, excessive working time, exploitation of migrant labour, freedom of association, gender equality, legal systems, and corruption. The level of risk per category is proportional to spend and to the inherent risk of transacting in the industries that the suppliers belong to.

No global supply chain is free of modern slavery. The external risk assessment highlighted the following areas of highest risk likelihood to people in our supply chain occurs:



This initial risk assessment provided O'Brien® with an understanding of the latent modern slavery risk. To consider how as an organisation O'Brien® may contribute to this risk, the internal working group considered if our risk of modern slavery is:

1. A direct result of our operations (caused)
2. Due to certain business practices that increase exploitation such as unrealistic cost targets and delivery timeframes for a supplier that can only be met by using exploited labour (contribute)
3. Due to having supply chain risks such as subcontractors or suppliers that use forced labour to complete the project or provide the service or product (directly linked)

Overall, the initial assessment determined that the majority of our risk came from supply chain risks (directly linked) both in our local subcontractors and suppliers, and from our international supply chains.

3.1. *Prioritisation of high-risk suppliers*

Based on the results of the risk assessment, the modern slavery working group conducted a prioritisation session. The aim was to prioritise suppliers based on the supply chain latent risk and the level of influence or control we as an organisation have to influence and work with suppliers or contractors. This prioritisation will help us achieve the biggest impact in the coming years, focusing our efforts and preventing mitigation action from being diluted over a vast number of suppliers with varying levels of modern slavery risk.

The method for prioritisation is as follows:

SUPPLY CHAIN LATENT RISK	LEVEL OF INFLUENCE AND CONTROL	YEAR
<i>High</i>	<i>High</i>	2020; 2021; 2022
<i>High</i>	<i>Medium</i>	2022; 2023
<i>Medium</i>	<i>High</i>	2023; 2024
<i>Medium</i>	<i>Medium</i>	2024; 2025

4. ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

In addition to the risk assessment, we also implemented actions that both strengthened our existing risk management process and introduced new due diligence practices for preventing modern slavery. These actions are outlined below.

4.1. *Gap analysis of our existing policies and documentations*

An independent third party was engaged to review our procurement practices and all relevant O'Brien® and Belron® documentation to identify gaps regarding modern slavery mitigation and opportunities to improve our practices and prevent modern slavery. This gap analysis highlighted our procurement strengths and key improvement opportunities which informed the development of a 3 year Modern Slavery Action Plan.

4.2. *Modern slavery champion and working group*

O'Brien® appointed a modern slavery champion to lead the design and implementation of the company's modern slavery prevention, mitigation, and remediation efforts. The modern slavery champion is supported by a working group with an aim to inform and embed anti-modern slavery practices and maximise the effectiveness of O'Brien® actions. The champion and working group have achieved the following:

- Designed the Modern Slavery Action Plan
- Developed the Modern Slavery Policy and remediation processes
- Analysed 100% of procurement spend and provided oversight over the actions taken including the risk assessment
- Rolled out modern slavery training initiatives
- Participated in formal and informal industry working groups and conferences on modern slavery, and shared insights internally

4.3. Working with Belron®

Our parent company Belron®, a signatory to the UN Global Compact, has experience aligning their operations with the universal principles of human rights and labour. This includes having modern slavery provisions in their policies, processes, and contracts.

Leveraging our parent company's existing knowledge and tools to address modern slavery, we adopted similar purchasing process and started utilising their supplier management approach in our O'Brien® Automotive glass division. This approach includes using similar contracts with modern slavery provisions, similar processes for onboarding suppliers and due diligence as well as supplier monitoring and auditing.

4.4. Implementation of a Supplier Code of Conduct

O'Brien® has recently rolled out a new Supplier Code of Conduct that sets the minimum expectations for ethical behaviour from our suppliers and contractors for both new and existing suppliers. This includes a section on labour and human rights, specifically forced and compulsory labour, child and underage labour and freedom of association. New suppliers and subcontractors that wish to engage with O'Brien® must agree to the Supplier Code of Conduct and are expected to behave accordingly. Furthermore, compliance with the Supplier Code of Conduct is included in the supplier contracts with provisions and consequences for non-compliance.

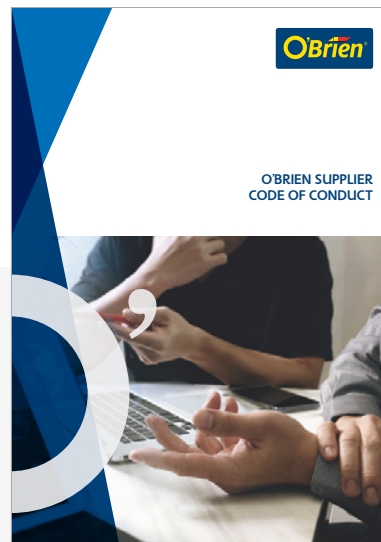


Figure 6 - Supplier Code of Conduct

4.5. Adoption of a Modern Slavery Policy

To communicate our commitment to and stance towards modern slavery, human trafficking, and all kinds of exploitation we developed a new Modern Slavery Policy based on the UN Guiding Principles on Human Rights and the Modern Slavery Act 2018. The policy applies to all team members, contractors, and suppliers in Australia and overseas including the workers in our extended supply chains and those that live in the communities we operate in.



Figure 7- Modern Slavery Policy

4.6. Auditing

We have a long-standing internal auditing program that assesses the compliance of our major glass suppliers with O'Brien® standards of ethical behaviour. This auditing program includes documentation review and a once-a-year unannounced visits to supplier factories. This auditing program helps us detect if there are cases or concerns of modern slavery in our major suppliers and it is complemented by auditing done by our parent company Belron® who shares the results with us.

4.7. Modern slavery education and training

One of the key areas for addressing modern slavery is training our staff and suppliers to help them understand modern slavery and to help them be able to recognise the signs of modern slavery. To do this, we took the following actions:

- Created the “Our Way of Working” (Figure 8) - this was designed to help our employees make the best decisions guided by our ethical principles of integrity, respect and trust. It includes scenario examples of difficult or uncertain decision and an Ethics Checklist.
- Rolled out training for key procurement staff, managers and senior managers. This training included background on modern slavery and the legislation, relevant risks of modern slavery, case studies and our zero tolerance approach towards modern slavery, including our remediation process and having the knowledge and confidence to act if modern slavery is detected.

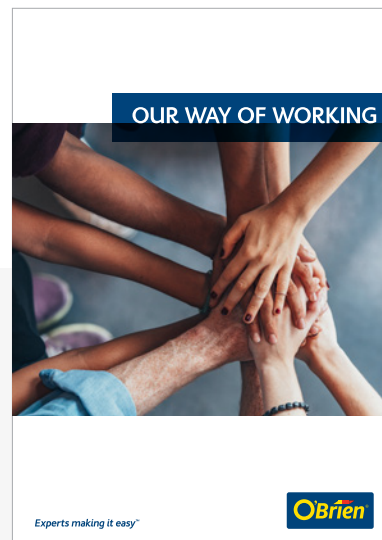


Figure 8 - Our way of working

4.8. Whistleblower Policy and anonymous hotline

O'Brien® is committed to promoting and supporting a culture of ethical behaviour; we understand the importance of having a whistleblower service that is accessible, trusted, and anonymous to identify modern slavery and human rights issues and take appropriate action. Our Whistleblower Policy is easily available to internal and external stakeholders through the website and is promoted via posters (Figure 9) located across our offices and branches.

O'Brien® has a whistleblower hotline. This hotline is an independent and anonymous service to raise concerns of suspected modern slavery. The Whistleblower Policy and services are available to suppliers, contractors, and subcontractors and can be used as a grievance mechanism for modern slavery cases and reports.



Figure 9 - Speak Up poster

4.9. Modern Slavery Action Plan

O'Brien® has established a clear framework of action for preventing, mitigating, and detecting modern slavery. The approach for the three-year plan sets out a roadmap of actions that covers governance, risk management and due diligence, training and education, supplier engagement, partnerships, evaluation, remediation, and reporting. The implementation of this action plan will be overseen by the modern slavery champion and working group.

4.10. Whistleblower Policy and process for remediation

To support the current Whistleblower Policy and hotline, O'Brien® established a remediation process which outlines a clear course of action should modern slavery cases be identified or concerns be raised. The key purpose of the remediation plan is to ensure that any victim of modern slavery is protected, and to guide O'Brien® on the best and most appropriate pathway for supporting a victim to return to their personal circumstances prior to modern slavery. We at O'Brien® recognise that every case is unique and will tailor our approach accordingly.

5. ROADMAP OF MITIGATION ACTIONS SCHEDULED FOR 2021

As part of our continued commitment towards preventing modern slavery in our operations and supply chain, and in accordance with the Modern Slavery Action Plan and the risk assessment we made, O'Brien® plans to undertake actions in the following categories:

5.1. *Continue to conduct due diligence with new and existing suppliers*

One of our commitments is to strengthen our due diligence process when engaging suppliers and contractors. To achieve this commitment we will implement the following steps:

- Continue to communicate the Supplier Code of Conduct and the Modern Slavery Policy to all new suppliers who must agree to the Supplier Code as part of the onboarding process.
- Develop a modern slavery questionnaire and roll out to high risk suppliers
- Incorporate modern slavery expectations and minimum requirements into the supplier engagement and selection processes.
- Embed modern slavery clauses into new and existing supplier contracts.
- Expand our existing auditing program to high-risk suppliers with increased focus on modern slavery.

Furthermore, O'Brien® will continuously engage with identified high risk suppliers and critical suppliers to understand and continue to assess their performance and risk levels, actively encouraging improvement over time.

5.2. *Continue our training and communication efforts*

We will continue our modern slavery training and communication efforts to employees and suppliers. These efforts include:

- Developing a training plan for internal and external stakeholders
- Modern Slavery training targeting all employees with procurement roles
- Training and educational material for high-risk suppliers

5.3. *Partnerships*

We will investigate potential industry partnerships to tackle modern slavery more efficiently. By partnering with experts who have this specific knowledge, or collaborating with those who have similar supply chains, we can have a wider and more effective impact when mitigating modern slavery.

6. EFFECTIVE ASSESSMENT OF ACTIONS

In order to understand if the modern slavery actions are being delivered and implemented effectively O'Brien® will constantly look for evidence that the planned activities are having the desired impact of preventing modern slavery. We have established an evaluation framework to review the effectiveness of the actions taken to mitigate modern slavery risk; KPIs will be developed and assigned to specific actions. The framework has set a process to evaluate actions taken and communicate progress on their effectiveness to directors and to other relevant stakeholders.

In order to measure the effectiveness of the actions and implement the evaluation framework, O'Brien® will take a three-step approach:

- **Self-evaluation:** Based on reported information and recorded data, O'Brien® will conduct a yearly internal evaluation, this evaluation will focus on the achievement of the planned activities in the road map and the previously mentioned KPIs.
- **Beginning of the year and end of the year:** Every year O'Brien® will conduct a survey with the suppliers engaged in modern slavery training to understand the impact of the training and identify gaps and needs for the following year.
- **Audits:** O'Brien® will implement an audit program to assess the progress of the Modern Slavery Action Plan and determine if it is achieving the desired outcomes, if the program is consistent with best practice; with the purpose of the evaluation to lead to learnings and continuous improvement. This may include collaboration with its parent, Belron® and/or engaging a third party provider.

The modern slavery champion with support of the modern slavery working group will determine the most appropriate method, scope and resources for assessing the effectiveness of our approach and processes related to modern slavery risks. This will be reported and reviewed by the Executive Leadership Team and the Board. The evaluation of the effectiveness of actions will follow the 'framework to measure effectiveness'.

In FY2021, the Working Group will define quantitative indicators that will be used to assess the effectiveness of our modern slavery risk management and processes. Other key actions include:

- Improving the Supplier Code of Conduct and its rollout to suppliers
- Training and capacity building for our procurement and human resources staff;
- communications to further develop awareness and understanding of modern slavery and our actions within our workforce.

The Working Group will also own the Modern Slavery Action Plan, which is a 3-year roadmap to guide our business with the following objectives:



This approach aligns with our purpose of making a difference by improving awareness and reducing the risks of modern slavery in our operations and supply chain. Given the hidden nature of modern slavery, we fully appreciate that this is a complex issue.

Our first Statement has highlighted our actions in understanding our supply chain whilst establishing policies, processes and modern slavery awareness and training as our building blocks for future years. Our aim is to demonstrate progress from this initial Statement by engaging in an incremental journey of improvement.

This Statement is made pursuant to section 13(1) of the Modern Slavery Act (Commonwealth) 2018. It constitutes the joint statement of the O'Brien® Group and covers the reporting period 1 January 2020 to 31 December 2020.

This Statement has been reviewed and approved by the O'Brien® Board of Directors on 18 June 2021.

A handwritten signature in black ink, appearing to be 'P. Lumsdaine', with a stylized flourish at the end.

Peter Lumsdaine

CEO and Managing Director - O'Brien® Group
June 2021