

Modern Slavery Statement FY2022



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Visy's Reporting Entities

Visy is a global leader in packaging and resource recovery. Our innovation, manufacturing and logistic capabilities are organised around an integrated closed loop and include paper, primary packaging, fibre packaging, packaging supplies and consumables, point of sale displays, automation, materials handling, logistics and recycling. Together, they give life to tailored solutions that deliver enduring value for our customers.

In accordance with clause 14 of the *Modern Slavery Act 2018* (Cth) (Act), Visy is submitting this statement as a joint statement on behalf of, and in conjunction with, all the reporting entities of the Visy Group, including Visy Industries Australia Pty Ltd, as listed in Appendix 1. A reference to Visy in this statement is intended to cover all such entities.

A word from our CEO Our Modern Slavery Statement

Across Visy, we are committed to our vision to be a global leader in creating sustainable packaging solutions for a better world, and equally committed to protecting the human rights of workers in our business and supply chain.

As we continue to grow and expand in global markets, we remain committed to the elimination of modern slavery which is a growing and complex problem in global supply chains, best fought with collective and deliberate action.

Visy seeks to engage fairly with suppliers, new and old, by continual reassessment of all goods and services provided by our suppliers across all our divisions.

Throughout FY2022, our teams have continued to work diligently with our suppliers to ensure they meet Visy's minimum standards documented in our policy — Commitment to Responsible Supply Chains.

Further, the team has continued to grow its capacity in this space, despite the ongoing challenges and disruptions of COVID-19:

- Additional resources have been allocated to the day-to-day due diligence assessment of Visy's suppliers.
- We reviewed our Code of Conduct to strengthen our requirements relating to the areas of protection of human rights, child labour laws, and diversity and inclusion. The updated Code of Conduct will be rolled out with new and reactivated suppliers in FY23.
- We have continued to partner with Sedex to provide even further oversight between Visy, its suppliers and customers on responsible sourcing indicators.
- Our Human Resources team continues to strengthen and internalise recruitment processes and third-party managed employment arrangements. In addition, the implementation of a Global HRIS (Human Resources Information System) is providing increased visibility, reporting and process improvements.

Additionally, Visy is continuing to execute its five-year strategy for Responsible Sourcing, which will see further commitment to resourcing this important business function.

As we share our third Modern Slavery Report, I am proud of the work and commitment that continues at Visy in this area and am pleased to present this Modern Slavery Statement.

MARK DE WIT Chief Executive Officer, Visy



About Visy

A global leader in creating sustainable packaging solutions for a better world

Visy is a global leader in packaging and resource recovery and has been a pioneer in sustainability since its inception. Our innovation, manufacturing and logistic capabilities are organised around an integrated closed loop. Together, they give life to tailored solutions that deliver enduring value for our customers.

In business for over 70 years, we operate in over 150 sites predominantly throughout Australasia. We currently employ around 7,000 people to help create sustainable and innovative products for our customers.





Our values



CUSTOMER FOCUS

We will build strong relationships with our customers to support their business. When they succeed, so do we.



RELENTLESS PURSUIT OF BEST VALUE

We will be innovative in driving to achieve the best value for the supply chain.



SAFETY AND ENVIRONMENT

Everything we do is dependent on the safety of ourselves, our employees, our customers and the communities in which we operate. Sustainability is critical to our business.



ACTING WITH URGENCY, PASSION AND ENERGY

We have a strong work ethic and commitment to the success of "one Visy". We act decisively, using facts, to achieve the best outcomes for our customers and for Visy. Our key people act with a strong sense of business leadership.



DEVELOPING EXCELLENCE IN PEOPLE

Core to our personal credibility is treating people with respect. We encourage everybody to be their best. Our people are supported and challenged to achieve their potential.

Our approach

Visy supports the United Nations Declaration of Human Rights. Our company has a core value of treating all people with dignity and respect.

We are committed to operating with respect for human rights and working across our value chain to eliminate any forms of modern slavery. As a signatory to the United Nations Global Compact (UNGC) since 2014, Visy upholds the 10 UNGC Principles in the areas of Human Rights, Labour, Environment and Anti-corruption. We also support and contribute to the United Nations 17 Sustainable Development Goals (UN SDGs). We contribute to SDG 8 — Decent Work and Economic Growth through fair pay and conditions, and our policies on supply chain and no child or forced labour.

Our Sustainability Framework

This year we launched our Sustainability Framework which outlines what is important to us and our stakeholders and the priority areas which allow us to create long-term value and benefits for the environment, our employees, customers and communities.







Our Framework is organised into three pillars: our Principles, our People and our Planet. With the increasing focus and importance of management of supply chains, we have included a specific focus area within the Principles pillar. The pillar consists of two key focus areas:

- **Partners for a better world:** Operating as a globally trusted business that drives innovation and provides customers with long term value; and
- **Responsible Supply Chains:** Sourcing responsibly and reducing our impacts across the value chain

The Responsible Supply Chains focus area includes our response to the risks of ethical sourcing and modern slavery.

Our approach to ethical sourcing and modern slavery

We are committed to ensuring responsible, ethical and sustainable engagement with our suppliers of materials and services. We believe that the key to successful business is a collaborative approach with our suppliers, service providers and customers.

Our Responsible Supply Chains Policy, endorsed by Visy's Executive Chairman, Anthony Pratt, and Visy's Chief Executive Officer, Mark De Wit, supports this commitment.

For many years, we have evaluated our impact on communities within our supply chain, particularly in the pulp, paper and wood industries.

Our memberships

Visy continues to be a progressive and collaborative member of the following social and environmental initiatives:

- FSC Australia
- Sedex
- United Nations Global Compact Australia
- Australian Packaging Covenant Organisation
- Australian Council of Recycling
- Ecovadis

Visy participates in the United Nations Community of Practice for Modern Slavery.



In more depth Our operations and supply chain

Our operations

Our innovation, manufacturing and logistic capabilities are organised around an integrated closed loop, offering our customers a full lifecycle of packaging capability.



Further details on each of our business units can be found on www.visy.com



Our supply chain

We have a diverse global supply chain to support the provision of goods, materials, parts, and services across our portfolio of products, to ensure we supply our local and global customer base.

Our primary supplier base is within Australia and New Zealand, making up 86% of our suppliers.

Our secondary regions of supply are Europe and Asia, being 6% and 5% respectively.

Suppliers we partner with are required to review and sign Visy's Supplier Code of Conduct. Suppliers onboarded are reviewed for risk factors, including entity sector, country, ownership, directors and shareholders, age of business, global slavery index country and sector, through an external licensed risk rating tool set.

High risk rated suppliers are required to provide further information on policies relating to:

- modern slavery, and/or child and forced labour
- responsible sourcing
- whistleblowers, anti-bribery and corruption
- health, safety and environment
- any other matters which may be relevant having regard to our expectations of our suppliers as set out in our Supplier Code of Conduct.

In addition, for critical or high spend materials, a robust sourcing process is followed, and plant audits may be conducted prior to, or following engagement, and on an ongoing basis as part of supplier relationship management.



Visy's global suppliers

Top 5 Countries

Country	% of Suppliers
Australia	75.1%
New Zealand	10.8%
United Kingdom	2.4%
United States	2.4%
China	1.8%

In FY22, of the suppliers onboarded less than 1% were deemed high risk based on Modern Slavery Country assessment. These suppliers are monitored on an ongoing basis.



Identifying risk

The potential for modern slavery risk in our operations and supply chain

We acknowledge there are inherent modern slavery risks within our supply chain, given its size and complexity.

Key areas of supply chain risk covered in our review processes and management strategies include:

- conflict minerals
- manual sorting involved in the preparation of materials for recycling
- disruption to normal supply chains caused by the pandemic
- disruption to normal supply chains caused by the Ukraine conflict
- sourcing from low-cost countries; and
- labour hire firms.

We seek to minimise these risks through the predominant use of Australasian suppliers, and ensure attention is placed on these areas through our supplier risk assessment process.





Managing risk

Actions to assess and address modern slavery risks

Visy utilises external tools to help identify potential modern slavery in our supply chain, with the aim to ensure the engagement of our suppliers is fully assessed in advance of trading, and to monitor and assess risks on an ongoing basis.

Creation of a formal Modern Slavery Action Team and a Supply Chain Risk Review Panel (SCRRP)

In order to address potential modern slavery practices in our supply chain, Visy uses external industry assessment software, and has an executive team, Modern Slavery Action team and SCRRP in place. The SCRRP meets quarterly to review and assess supply chain risks.

Both the Modern Slavery Action team and the SCRRP have been authorised and mandated to monitor, assess, remediate and report on the potential for modern slavery risks in our operations and supply chains.

The SCRRP has a formal charter outlining the functional requirements of Visy's supply chain risk assessment and updates the Visy executive team. This charter was reviewed and updated in FY22.

The SCRRP is comprised of senior managers from Corporate Counsel, Group Commercial, Governance and Risk, Group Procurement and Operational Excellence.

In addition, permanent positions are in place to conduct individual assessments of each new supplier as part of the on-boarding process, and to monitor and review existing suppliers used by Visy. This is managed on a daily basis.

Use of third-party software

Visy continues to use licensed third-party software to assist in reviewing our supply chain for modern slavery risks and to support the SCRRP. This tool assesses our suppliers against a number of different risk indexes including: entity sector, country, ownership, directors and shareholders, age of business, global slavery index country and sector. New suppliers are reviewed by the software as part of Visy's formal on-boarding process. Suppliers who have been 'red flagged' are subject to a review process to address the identified risk factors to ensure suppliers are aligned with Visy's requirements for responsible and ethical sourcing prior to any on-boarding.

Visy reviews supplier activity each quarter. Suppliers not utilised in the previous 18 months are deactivated. In FY22 approximately 7% of suppliers were deactivated. If suppliers are reactivated, they are required to review and complete the Supplier Code of Conduct and are reassessed for risk.

In FY22, Visy conducted reviews of over 1,500 new or reactivated suppliers as part of the onboarding process. In FY22, there were approximately 8,000 suppliers actively monitored.

Visy is a Sedex AB member, allowing Visy, as a buyer, to review our suppliers' self-assessments, risk ratings and any independent audits. In FY22 Visy began a program to link to key suppliers already established on Sedex and to onboard others with a prioritised focus on prime and other material suppliers. This is an ongoing priority.



Use of publicly available indexes and resources

In addition to using the third-party software, we further assess the risks of modern slavery within our supply chain by referencing a number of publicly available indexes and resources, which address the risks related to region, product and industry. These include:

- 1. Walk Free Foundation GSI index 2018 (due to refresh in late 2022)
- 2. International Labour Organisation Modern Slavery Statistics
- 3. United Nations Global Compact
- 4. **Sourcing Hub** Preferred by Nature (previously Nepcon)
- 5. **Transparency International** Corruption Perceptions Index 2021

Executive and senior management support and communications

The Visy executive team continues to support actions taken within the group to comply with ethical sourcing practices and modern slavery legislation, including through communications to our employees and suppliers (see Appendix 2). This includes:

- Communication and training to new employees involved in the procurement process prohibiting the making of procurement commitments with a supplier prior to formal assessment and sign-off in Visy's supplier onboarding system.
- Formal letters to new and reactivated suppliers, with Visy's Supplier Code of Conduct attached. In the communication, suppliers were asked to review, understand and accept our Supplier Code of Conduct as acknowledgment and acceptance of the code. A repository of all returns signed by suppliers acknowledging they have read and understood Visy's Supplier Code of Conduct is maintained by our Group Procurement team.

Finally, this statement was tabled to and endorsed by the Visy executive team in December 2022 prior to its submission and publication on the Modern Slavery Register, and on the Visy website.

Group-wide training and awareness

Modern slavery training and awareness programs are in place for employees involved in the procurement process. The training is delivered by group wide functional support leads, with formal sign-off confirming the understanding of requirements from the sessions attended by participants. Some of these programs are also run as a component of the induction process for our new employees.

Specific responsible supply chain and modern slavery training has been delivered to our Australian purchasing and procurement teams and our Singapore trading and procurement team.

Formal group wide training and awareness programs are run for our employees throughout the Visy group on the subjects covered by key policies and procedures relating to:

- fraud, theft and improper conduct, including the procurement process;
- · whistleblower and complaints handling procedures;
- foreign bribery and corruption; and
- code of conduct.

We regularly review and update our 'Welcome to Visy' induction program to ensure that, in addition to providing a warm welcome to our new employees, our inductions take note of any relevant legislative changes or employer obligations. We also continued to run our series of educational lunch and learn sessions to help our managers comply with our policies and procedures. Topics covered included the Code of Conduct, conducting an investigation, managing mental health, and managing workplace bullying and harassment.

During FY22, we have been developing a company wide refreshed program on Respectful Workplace Behaviors for all employees across the business. It covers workplace bullying, harassment (including sexual harassment), and discrimination. We are also developing a Code of Conduct refresher program, which will be reported on in our FY23 report.

In addition, Visy Procurement team have a Procurement and Supply Australia membership which focuses on education, training, awareness and networking regarding ethical sourcing and modern slavery.



Auditing

Formal audit programs are in place to test for compliance, to review and assess the environmental aspects of each supplier before their engagement, and as an ongoing process.

Audit roles have been established in the regions where the majority of procurement occurs and where our suppliers are based, allowing for physical site assessments to be conducted by procurement staff.

Our internal audit program contains a section covering local procurement control compliance. This program includes specific questions for country-based procurement staff about engagement with suppliers for ongoing assessment, including confirmation that staff have conducted the assessments outlined in the procurement policy requirements. Audit sample testing includes a review of compliance checklists completed and maintained by procurement staff.

Annual audits are also conducted to assess compliance with key outsourced contracts, with an emphasis on labour law compliance for labour hire services.

Policies and procedures

Visy has a range of policies and procedures which address modern slavery within our own business, as well as within our supply chain.

Supplier Code of Conduct

As part of its commitment to responsible and ethical sourcing, Visy requires all new suppliers to comply with our Supplier Code of Conduct. Visy's Supplier Code of Conduct sets out its expectation that suppliers involved in the supply of goods and services to Visy observe the highest standards and conduct business in an ethical and professional manner at all times.

During FY22, Visy conducted a review of our Supplier Code of Conduct with a specific focus on social and ethical procurement. This included strengthening Visy's requirements of suppliers in relation to:

- the protection of human rights;
- · compliance with child labour laws;
- diversity and inclusion;
- · compliance with economic and trade sanctions; and
- minimising environmental impacts.

Visy's updated Supplier Code of Conduct will be rolled out with new suppliers in FY23.



Relevant policies and procedures

Our relevant policies and procedures include:

Policy / procedure	∃ ⊘ Status
Employee Code of Conduct	Existing
Supplier Code of Conduct	Existing, reviewed. Released FY23
Whistleblower and Improper Conduct Policy	Existing
Complaints Handling Policy and Procedure	Existing
Child Forced Labour Policy	Existing
Anti-bribery and Corruption Policy	Existing
Responsible Sourcing Commitment Policy – Fibre	Existing
Commitment to Responsible Supply Chains	Existing

Operational assessments

We have undertaken Sedex Members Ethical Trade Audit (SMETA) 4 pillar audits and AIM- PROGRESS member audits at a number of our sites since 2014. These audits cover workplace labour and safety standards, among other areas.

The audits have created learnings that have been used to improve our policies and procedures. Due to COVID-19, these onsite audits were placed on hold in 2020 and 2021 in line with our COVID-19 safe essential services manufacturing guidelines. As COVID-19 restrictions continued as an issue in Australia and New Zealand, we reverted to conducting virtual audit assessments of nine sites in Q4 2021.

Visy continued to hold a 'Silver' status as a result of our May 2022 review by Ecovadis. As a result of the internal engagement during this review, we have considered the opportunities to make further progress in the 'sustainable procurement' area, much of which is contained within this report. All existing suppliers on Visy's database were issued with the Supplier Code of Conduct (2019 version), which they were requested to accept. All new and reactivated suppliers also receive a Supplier Code of Conduct for acceptance. The Supplier Code of Conduct has been reviewed in FY22, the updated version will be released FY23.

Our Supplier Code of Conduct covers a range of modern slavery and other compliance requirements, such as legally applicable wage laws, working hours laws and regulations, prohibition of forced labour and child labour, and legal rights of employees. We request formal sign off by any new supplier prior to trading.

Should any new suppliers decline to sign the Supplier Code of Conduct, these suppliers are referred to our legal counsel for further assessment and action prior to onboarding.



Internal due diligence

Labour hire and recruitment

In FY22, we finalised a comprehensive labour hire tender process in New Zealand aimed at ensuring that all of our labour hire service providers are aligned with our commitment to responsible workforce sourcing. This process included an increased focus on modern slavery risks, pre-employment checks and requirements, and compliance with workplace laws. In addition, any new labour hire providers added in Australia over FY22 have undergone a thorough supplier onboarding process to ensure they meet our standards with respect to responsible workforce sourcing and compliance.

Payroll and compliance

We have reviewed and invested further in people and processes to bolster our compliance across the many facets of payroll. We have now implemented a Human Resources Information System (HRIS) globally for increased visibility, reporting, and strengthened systems and processes. We've also grown the remit of our internal audit processes through our Payroll Compliance Manager. We also undertook a complete review of our Superannuation Contribution Guarantee obligations in partnership with PwC and worked with the Australian Tax Office to report and finalise outcomes. An independent review of third party security suppliers' wage rates was completed in FY22.

Minimum ages

Visy complies with state based minimum age requirements.

Verifying work rights

Work rights checks are mandatory for all new employees in Australia. Checks for new employees are conducted by our supplier, CV Check, and verification of work rights for existing employees are conducted on the Department of Home Affairs online visa verification system (VEVO).

Where a potential employee is flagged with limitations to their work rights, the hiring manager in consultation with human resources — determines the appropriate steps to be taken, for example, the offer of a fixed term contract only or a clause in the contract that ongoing employment is subject to maintaining work rights.

Monitoring overtime and rest breaks

Visy continues to prioritise the management of work hours and rest breaks to mitigate the potential adverse health effects and safety consequences of long work hours. Visy uses comprehensive data analytics and reporting to manage potential fatigue risks in our workforce in compliance with Visy's Fatigue Management Policy and Procedure. During FY22, these metrics (which are updated daily) were reported to the Visy executive team on a fortnightly basis and fatigue risk compliance was used as a key performance indicator of operations.

Sanctions Compliance Program

During FY22, Visy continued to perform due diligence on suppliers for legal compliance which included a review of new sanctions imposed by governments in 2022 in response to the Ukraine conflict.

In addition to monitoring publicly available information on the introduction of new sanctions, Visy's compliance program uses third party software to screen areas which could give rise to sanctions risk involving new and existing suppliers and to monitor any changes to their status. Where a potential sanctions risk is identified, the relevant Supplier is referred to Visy's SCRRP for review and prompt action, which can include further investigation into and auditing of the supplier to ensure strict compliance with applicable sanctions.

In FY22, Visy's Supplier Code of Conduct was also updated to reiterate that Visy's expectation for legal compliance by Visy suppliers extends to all economic and trade sanctions applicable to the business activities.

Measuring effectiveness

The importance of evaluating the impact of our actions

When assessing whether we have the right actions in place to address modern slavery in our supply chain, we consider both quantitative and qualitative factors, whether there are any gaps, and how our actions are delivering our objectives and taking us toward our target state.

Making use of the relevant tools

Before landing on our current licensed tool set, we embarked on a discovery program of the tools available to help analyse risk in the supply chain and, in particular, our first line suppliers. As part of the discovery program we reviewed a number of techniques and software options, before coming to a decision. We have continued to keep ourselves abreast of developments and competitive offerings as a benchmark to having an effective toolset.

Collaborating with others

As part of our UNGC signatory, we have participated in the activities of the Australian user group. This group serves to discuss the various challenges facing us all and the approaches being taken. As a benchmark, this further assists us in determining whether the actions we are implementing are as effective as possible. We continue to support the requirements of our various fast-moving consumer goods customers performing their own due diligence actions, again validating our actions and highlighting new opportunities to explore.

Looking at available internal metrics and managing to targets

As part of our measurement processes, we ensure 100% completion on the following measures for our operational supply chains:

- risk assessment of existing suppliers;
- risk assessment of on-boarding suppliers;
- risk assessment of reactivated suppliers;
- investigation status for new red rated risks to the SCRRP;
- issue of Supplier Code of Conduct to suppliers; and
- covering the relevant training requirements when inducting new employees.

In FY22, we regularly reported to management on the following measures:

- number of new suppliers rejected as too high risk or would not work toward acceptable plans;
- number of new suppliers conditionally approved and having up to date status on required actions;
- number of validated corrections to known situations; and
- percentage of suppliers accepting and returning the Supplier Code of Conduct as requested by us.



Our Independent Governance Board

Our plans in relation to addressing modern slavery, our supply chain review feedback and our risk results are reported to and monitored by our Independent Governance Board.

Read an overview and composition of our Independent Governance Board on our website

Consultation process between entities that this statement covers

The Visy executive team includes senior representatives from each of Visy's reporting entities, and they are mandated to approve actions to address modern slavery for Visy's reporting entities. The Modern Slavery Action team and SCRRP engaged with the Visy executive team throughout the reporting period in relation to addressing the mandatory criteria of the Act, and in implementing the actions set out in this statement.

The Visy executive team were consulted in the preparation of this statement. The statement was tabled to the Visy executive team in its capacity as the principal governing body of Visy and approved by them on 6 December 2022.

ROBERT KAYE Company Secretary, Visy





Appendix



Appendix 1 List of reporting entities covered under this joint statement

Visy entity

Visy Industries Australia Pty Ltd	Visy Glass Operations (Australia) Pty Ltd
Visy Packaging Pty Ltd	Visy Glass Australasia Pty Ltd
Visy Pulp and Paper Pty Ltd	Visy Glass Packaging Services Pty Ltd
Visy Logistics Pty Ltd	Visy Glass International Pty Ltd
Visy Board Pty Ltd	
Visy Board (Wodonga) Pty Ltd	
Visy Paper Pty Ltd	
Visypet Pty Ltd	
Ace Print & Display Pty Ltd	
P&I Pty Ltd	
Visy Glama Pty Ltd	
Visy Energy Pty Ltd	
Visy Recycling MRFs Pty Ltd	
Salvage Paper Pty Ltd	
Visy Recycling Australia Pty Ltd	
Regional Recyclers Pty Ltd	
Build Run Repair (Australia) Pty Ltd	
Visy Albury Pty Ltd	
PH Penrith Pty Ltd	



Appendix 2 CEO communication

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Appendix 2 CEO communication

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FOR A BETTER WORLD

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