

2025 Modern Slavery Statement

This Modern Slavery Statement relates to all activities of Viscount Plastics Pty Ltd (ACN 005 647 389) (**Viscount Plastics**) between the reporting period from 1 July 2024 to 30 June 2025 (**Reporting Period**). Viscount Plastics is a mandatory reporting entity for the Reporting Period under the *Modern Slavery Act 2018* (Cth) (the **Act**). This statement sets out the measures taken to identify, assess and manage modern slavery risks in our operations and supply chains.

1 Structure, operations and supply chain

Viscount Reuse is the controlling entity of Viscount Pooling Company Pty Ltd (ACN 612 335 967) (**VPC**) and Viscount Pooling Systems Pty Ltd (ACN 618 166 742) (**VPS**) for the purposes of the Act. Both VPC and VPS are pooling businesses, while Viscount Plastics is the manufacturing business and employer of head office team members. Viscount Plastics, VPC and VPS are collectively referred to as Viscount Reuse.

Viscount Reuse is a joint venture between Pact Group (**Pact**) and Morrison to manufacture reusable materials handling and asset pooling solutions, and pool reusable assets incorporated in Australia and New Zealand. The manufacturing business makes reusable plastics containers for agricultural and retail supply chains. Plastic resin is imported from large Asian manufacturers on predominantly short-term contracts and some spot markets. Finished goods are supplied nationally to the pooling business and other customers. The pooling business provides reusable plastic crates and pallet bins for use in agricultural and retail supply chains. The pooled crates and bins are used by customers for the transfer of produce/protein within supply chains and then returned to the company facilities for washing and preparation for hire. Viscount Reuse has approximately 200 employees across Australia and New Zealand.

Viscount Reuse's supply chain primarily comprises the purchase of resin and colourants, packaging and chemicals. It also includes the purchase of transport and logistics, labour hire, machinery and equipment, including maintenance and repair services, utilities and facilities related services such as cleaning, waste management and security, and professional services such as accounting, IT services and legal services.

2 Risks of modern slavery in Viscount Reuse's operations and supply chain

Viscount Reuse is dedicated to maintaining strong partnerships with countries that uphold ethical labour standards and respect human rights. In all countries in which Viscount Reuse operates, we prioritise sourcing materials and labour locally whenever feasible. This approach provides greater visibility over the organisational structures, processes and practices of our suppliers and enables us to monitor their activities more effectively. By working within local markets, Viscount Reuse is better positioned to identify suppliers whose values and commitment to combating modern slavery align with our own expectations.

Viscount Reuse has geographically diverse and wide-ranging supply chains, which at times may include regions where the risk of modern slavery is higher. We expect the same rigorous standards for all contractors, suppliers and other business partners within our supply chains, regardless of location.

Direct supply chain

As a supplier of sustainable reuse and recycling solutions, with resin being a key raw material, Viscount Reuse maintains a relatively streamlined direct supply chain. This structure allows for significant visibility over tier 1 suppliers, reducing the risk of modern slavery within our direct operations

Procurement for Viscount Reuse's extended supply chain is managed by Pact which works with over 6000 suppliers. Approximately 80% of these inputs are sourced from countries identified by the Global Slavery Index as carrying a low risk of modern slavery.

Viscount Reuse acknowledges that modern slavery risks are present in its extended supply chain, including the supply chain of its controlled entities, and has conducted a review of its procurement from both geographical and industry perspectives which indicated that most sourcing does not occur in regions or sectors typically associated with a high risk of modern slavery. However, potential risks have been identified in relation to manufacturers of plastic resin in Asia, due to the elevated geographical risk factors in that region.

Labour Hire

Viscount Reuse recognises the modern slavery risks associated with temporary and casual labour. To mitigate these risks in Australia and New Zealand, we allocate at least 90% of our expenditure to three reputable casual labour providers that have robust anti-slavery processes in place.

3 Actions taken during reporting period to assess and address modern slavery

Viscount Reuse contracts Pact to provide procurement support for its supply chain. Actions taken by Pact to assess and address modern slavery, as outlined below, apply to all of Viscount Reuse's procurement activities. Pact is a signatory to the United Nations Global Compact and upholds its 10 principles, including those in relation to human rights and labour. During the Reporting Period, Pact implemented several measures to strengthen its management of modern slavery risks, which in turn enhance Viscount Reuse's ability to manage these risks within its own supply chain.

Integrity and Ethical Sourcing Committee

During the 2022/2023 Reporting Period, Pact established the Integrity and Ethical Sourcing Committee (**Committee**).

The Committee continues to meet quarterly to:

- evaluate risks and recommend appropriate actions if modern slavery risks are identified in Pact's business or supply chains;
- monitor current processes in place to identify new opportunities to strengthen Pact's approach to managing modern slavery risks across its operations;
- develop measures to assess and address modern slavery through due diligence and contractual obligations;
- develop training materials for Pact's employees and where appropriate, suppliers; and
- address related issues including anti-bribery and corruption risk, sanctions and ethical supply chain management.

Training

Pact has conducted internal awareness campaigns in relation to modern slavery, promoted through an employee newsletter and intranet banner. The campaign required Viscount Reuse employees to complete a training module which included a video outlining key modern slavery concepts and emphasising the importance of Pact's Modern Slavery Policy.

Due diligence

As part of our onboarding process for suppliers, we require all prospective suppliers to:

- complete our supplier questionnaire;
- confirm compliance with our Supplier Code of Conduct and our Modern Slavery Policy;
- familiarise themselves with all of our relevant policies; and
- comply with our Modern Slavery Policy.

Our suppliers are also required to hold their own suppliers to the same high standards. Viscount Reuse mandates that all suppliers and vendors acknowledge and commit to our Modern Slavery Policy as part of their registration.

For significant suppliers engaged through Pact, procurement involves tenders and requests for proposals which require participation in a due diligence process. While this process varies by jurisdiction, it generally includes completion of Pact's Modern Slavery Supplier Questionnaire, confirmation of compliance with its Supplier Code of Conduct, and provision of details in relation to all proposed subcontracting and outsourcing arrangements.

The information collected enables Pact to assess which suppliers align with its ethical values. Pact's supplier management platform requires suppliers at the on-boarding stage to confirm their compliance with Pact's Modern Slavery Policy and complete Pact's Modern Slavery Supplier Questionnaire. During the Reporting Period, Pact has continued to expand the use of this platform across the organisation and explored alternative methods including third party solutions to improve the assessment of supplier risk and identify high-risk suppliers upfront, although Pact has not yet settled on a preferred method.

Any significant modern slavery risks identified through due diligence or other channels are reported to the Committee. Pact's procurement team also monitors developments in relation to modern slavery risks of Pact's largest and most strategically significant suppliers.

Supply chain management

Pact's standard agreements for the procurement of goods and services, which also apply to Viscount Reuse's standard agreements include provisions designed for Pact's suppliers to uphold certain standards. These provisions include:

- (a) requirements for suppliers act in an ethical and socially responsible manner;
- (b) obligations for suppliers become signatories to and adhere to the principles of the United Nations Global Compact;
- (c) compliance with Pact's applicable policies and codes of conduct;
- (d) warranties ensuring that no forced labour, slavery, servitude or similar practices are in any way involved in the supply of goods or services to Pact;
- (e) warranties that suppliers will maintain appropriate policies and procedures to ensure compliance with the modern slavery legislation;
- (f) warranties that suppliers will supply all information and evidence reasonably requested by Pact to demonstrate compliance with the above;
- (g) the right for Pact, or an independent auditor appointed by Pact, to audit the supplier to verify the supplier's compliance with its warranties;
- (h) the right for Pact to terminate agreements with suppliers on the basis that the supplier has not complied with its obligations in relation to modern slavery;

- (i) prohibitions on outsourcing without oversight as to the employment conditions of the contractor or subcontractor; and
- (j) prohibitions on subcontracting the provision of goods or services without Pact's prior written consent.

Where contracts are entered into with significant suppliers that are not Pact's standard terms, customised provisions addressing modern slavery risks are incorporated into the agreement.

4 How Viscount Reuse assesses the effectiveness of its actions

As part of its services to Viscount Reuse, Pact assesses the effectiveness of its actions through several key mechanisms:

- (a) **Integrity and Ethical Sourcing Committee** – reviews, monitors, and continuously improves actions taken to address and assess modern slavery risks.
- (b) **Modern Slavery Supplier Questionnaire** – enhances the ability to evaluate the quality and depth of supplier responses to determine the extent of modern slavery risk mitigation measures.
- (c) **Supplier Management System** – aggregates data to measure effectiveness, including summarising supplier risk levels and identifying suppliers that have not agreed to comply with Pact's modern slavery requirements.
- (d) **Training** – modern slavery training has led to a measurable increase in awareness among relevant Pact employees regarding modern slavery risks and issues.
- (e) **Procurement Team Feedback** – ongoing feedback from the procurement team informs improvements to training, onboarding processes, and actions to disengage from high-risk suppliers.

5 Consultation

The leadership team of Viscount Reuse who completed this Statement are active participants in the day to day operations of each of Viscount Plastics, VPC and VPS, and therefore formal consultation was not required given the size and conduct of each entity.

This statement was approved by the board of Viscount Plastics Pty Ltd in their capacity as principal governing body of Viscount Plastics Pty Ltd on 15 December 2025.

This statement is signed by Jonathon West in his role as a director of Viscount Plastics Pty Ltd on 19 December 2025.



Jonathon West

Director of Viscount Plastics Pty Ltd