

# Modern Slavery Statement

FY2023



# Contents

A word from our CEO: Our Modern Slavery Statement	3
About Visy: A global leader in creating sustainable packaging solutions for a better world	4
Our values	5
Our approach to ethical sourcing	5
Our memberships	6
In more depth: Our operations and supply chain	7
Our operations	7
Our supply chain	9
Visy's global suppliers	9
Identifying risk: The potential for modern slavery risk in our operations and supply chain	10
Managing risk: Actions to assess and address modern slavery risks	11
Procurement Excellence Team and a Supply Chain Risk Review Panel (SCRRP)	11
Use of third-party software	11
Use of publicly available indexes and resources	12
Our supplier screening status	
Use of publicly available indexes and resources	12
Executive and senior management support and communications	12
Group-wide training and awareness	12
Auditing	13
Policies and procedures	13-14
Operational assessments	14
Internal due diligence	15
Measuring effectiveness: The importance of evaluating the impact of our actions	16
Making use of the relevant tools	16
Collaborating with others	16
Looking at available internal metrics and managing to targets	16
Our Governance Board	17
Consultation process between entities that this statement covers	17
Appendix	18
Appendix 1: List of reporting entities covered under this joint statement	19

# **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, 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.

During the reporting period, Visy acquired the assets of the wholesale supply and distribution business, Sales Force National Pty Ltd trading as ZENEXUS. This business now operates under Visy Retail Services Pty Ltd. Visy Retail Services Pty Ltd is not covered by this statement. Visy Retail Services Pty Ltd will submit its own modern slavery statement for FY2023, which will include details of the new business' integration into Visy's systems for vendor onboarding and managing modern slavery risk.

# A word from our CEO Our Modern Slavery Statement

Our purpose — for a better world — goes beyond our vision to be a global leader in sustainable packaging to our commitment to the human rights of people in our business and our supply chains.

Our success is inextricably linked to their success, which is why we are committed to the elimination of modern slavery and the highest standards of conduct with all our suppliers.

But we can't do it alone, which is why we take a collaborative approach with our suppliers, service providers, and customers.

I am proud of the commitment from our teams to ethical conduct, and acting with integrity, respect and professionalism.

This year we conducted a major review of our suppliers to ensure compliance with our policies. We also reviewed and updated our vendor onboarding process and systems to improve our reporting and capture insights from the data. Our team work diligently with our suppliers to ensure they understand and meet our Supplier Code of Conduct, which we updated in 2022. We also commissioned an audit of our environmental, social and governance (ESG) framework to support our commitment to sustainability, and ensure organisational alignment with our ESG strategy and key objectives. The results will help guide our focus over the coming years.

Further, a range of measures are helping us maintain rigour across our business and supply chain through:

- · a combination of internal and external audits
- refreshed and ongoing training for staff
- reviews of our systems and process
- new measures for payroll and legal.

I am pleased to present our fourth 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 75 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**

We support 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, we uphold 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**

Our Sustainability Framework, which outlines what is important to us and our stakeholders, sets out our priority areas of work. Working across these enables 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 Executive Chairman, Anthony Pratt, and Visy 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**

We continue to be a progressive and collaborative member of these social and environmental initiatives:

- United Nations Global Compact Australia
- Forest Stewardship Council Australia
- Sedex
- Australian Packaging Covenant Organisation
- Australian Council of Recycling
- Ecovadis
- Australian Forest Products Association.

We participate in the United Nations Community of Practice for Modern Slavery.



# In more depth Our operations and supply chain

# **Our operations**

We offer a range of products and services to ensure an end-to-end packaging solution is delivered.

#### **Our products**



#### Paper

We produce white and brown Kraft and recycled papers at our two Kraft paper mills and six recycled mills across Australia.

We use the paper to make cardboard and plasterboard liner, as well as export it globally.



#### Beverage can

We cover the full spectrum of beverage can services — from market leading design and innovation to high-speed manufacturing.

Many of Australia and New Zealand's most recognised beverage brands are delivered in the cans we make.



#### **Plastics**

We manufacture bottles and containers from virgin and recycled resins. Our recycled plastics plant produces food grade recycled PET and HDPE.

We offer plastic packaging solutions, including recycled PET and HDPE, to a range of industries.





#### Glass

We are the largest manufacturer of glass containers in the region. The glass packaging we make are used for world-renowned wine, beer, soft drink, water and food brands.

Our five glass facilities across Australia and New Zealand produce a range of colours including green, amber and flint glass.

#### Food can

As an integrated food can manufacturer, we cut, coat and print steel. We also make and source a full range of ends and cans.

We produce hundreds of millions of food cans every year, from single-serve foods like baked beans and dog food to paediatric nutrition like infant formula.



#### Cardboard

We manufacture corrugated cardboard packaging from recycled Kraft paper.

We can tailor solutions across multiple channels, including major retailers, export, wholesale and specialist areas such as cold chain, heavy duty and dangerous goods.



#### **Our services**



#### Recycling

We operate material recovery facilities (MRFs) and glass recycling facilities to recover and recycle household and commercial recyclables.



#### Point of sale

We create eye-catching point of sale stands to attract consumer attention.



#### **Logistics**

We provide domestic and



#### **Insights and innovation**

We support our customers with insights and innovation to help solve problems and bring new ideas to market and focus on sustainable solutions.



#### **Automation**

We provide automated solutions to pack, wrap and distribute products.



#### **Packaging supplies**

We provide packaging consumables including tape, glues, labels, wraps and adhesives.



#### **Materials handling**

We provide materials handling solutions, access and warehouse cleaning equipment.

international freight forwarding services — truck, rail and ship.

#### **Significant new services**

#### **CDS Vic Network Operator**

During the reporting period Visy commenced work on the Victorian Government Container Deposit Scheme (CDS) which commences 1 November 2023. We have been appointed as one of the network operators to provide collection and refund points across the Loddon, Mallee and Hume regions, as well as the inner northeastern suburbs of Melbourne.

#### **Visy Retail Services**

During the reporting period, we acquired the assets of the wholesale supply and distribution business, Sales Force National Pty Ltd, which now operates under Visy Retail Services Pty Ltd. Visy Retail Services supplies a range of consumer products and services to retail businesses. We source white label products, develop our own brands and seek to represent leading brand partners who value an effective and efficient service channel to deliver category solutions for retailers.

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



# **Our supply chain**

We have a diverse global supply chain that provides goods, materials, parts, and services across our portfolio of products and sites.

Our primary supplier base is within Australia and New Zealand, making up 84% of our total active suppliers.

16% of suppliers are based internationally. Our secondary countries of supply are USA and UK representing 3% each.

Suppliers we partner with are required to review and sign our 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 external licensed risk rating software. High risk rated suppliers may be requested 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
- directors, shareholders and owners
- any other matters which may be relevant having regard to our expectations of our suppliers as set out in our Supplier Code of Conduct.



## **Our global suppliers**

## **Top 5 Countries**

Country	% of Suppliers
Australia	73%
New Zealand	11%
United Kingdom	3%
United States	3%
China	2%



# **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 geopolitical tensions
- sourcing from low-cost countries
- labour hire firms
- sanctioned individuals and companies
- high risk countries and regions.

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.

In FY2023 a review was conducted on our supplier base for impacts arising from the Russia and Ukraine conflict.

In FY2024 we commit to continuing to conducting reviews of suppliers in high-risk countries and regions.





# **Managing risk**

# Actions to assess and address modern slavery risks

We use external software to help identify potential modern slavery risk in our supply chain. The aim is to ensure the engagement of our suppliers is fully assessed in advance of trading, and to monitor and assess risks on an ongoing basis.

# Visy's Procurement Excellence Team and Supply Chain Risk Review Panel (SCRRP)

To address potential modern slavery practices in our supply chain, we use external industry assessment software to onboard and monitor suppliers. In addition, we have Executive Teams, including the Procurement Excellence Team and the SCRRP, in place. The Procurement Excellence Team manage vendor onboarding for high risk vendors daily. The SCRRP meets quarterly to review and assess supply chain risks that are identified by the Procurement Excellence Team.

Both the Procurement Excellence Team and the SCRRP are 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 our supply chain risk assessment and updates the Executive Team. This charter was reviewed and updated in FY2022.

The SCRRP is comprised of senior managers from Corporate Counsel, Group Commercial, Governance and Risk, Group Procurement and Operational Excellence. In FY2023 there were 24 vendors presented to the SCRRP for assessment. All risks were actioned, managed and mitigated.

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 the existing suppliers we use. Next review dates are scheduled quarterly, and sanction reporting is conducted monthly.

# Use of third-party software

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

We review supplier activity each quarter, and conducted a major review of all suppliers in FY2023. Suppliers not used in the previous 18 months are deactivated. In FY2023 approximately 20% of suppliers were deactivated. If suppliers are requested to be reactivated, they are required to complete full onboarding process again, including completion of the Supplier Code of Conduct and reassessment of risk via external software.

In FY2023, we onboarded approximately 1,200 new or reactivated suppliers. In FY2023, there were approximately 9,000 suppliers actively monitored.

We are a Sedex AB member, allowing us, as a buyer, to review our suppliers' self-assessments, risk ratings and any independent audits. In FY2023 we continued a program to link key suppliers already established on Sedex.

# 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
- 2. International Labour Organisation Modern Slavery Statistics
- 3. United Nations Global Compact
- 4. Sourcing Hub Preferred by Nature (previously Nepcon)

# Executive and senior management support and communications

The Executive Team continues to support actions taken across Visy to comply with ethical sourcing practices and modern slavery legislation, including through communications to our employees and suppliers. 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 our supplier onboarding system.
- Formal letters to new and reactivated suppliers, with our Supplier Code of Conduct attached. In the communication, suppliers are 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 our Supplier Code of Conduct is maintained by our Group Procurement Team.

Finally, this statement was tabled to and endorsed by the Executive Team in November 2023 prior to its submission and publication on the Modern Slavery Register, and on our 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 from participants confirming their understanding of the requirements from the sessions. 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 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
- 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. In the year ahead, we will be including training on the Ethical Trading Initiative (ETI) Base Code, our Diversity and Inclusion Policy in our induction modules which will also be refreshed with all existing employees. The ETI Base Code is founded on the conventions of the International Labour Organisation and is an internationally recognised code of labour practice. In the year ahead we will also deliver a refreshed program on respectful workplace behaviors for all employees. This will cover workplace bullying, harassment (including sexual harassment) and discrimination.

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 Supplier Code of Conduct, conducting an investigation, managing mental health, labour hire management, and managing workplace bullying and harassment. In addition, our Procurement Team has 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. Audit sample testing includes a review of compliance checklists completed and maintained by procurement staff.

Regular reviews are also conducted to assess compliance with key labour hire contracts, with an emphasis on labour law compliance.

An internal audit was conducted by external consultant Protiviti covering our environmental, social and governance (ESG) framework in FY2023. This work included an assessment of:

- Current ESG processes, systems, and controls established to manage ESG activities and reporting in Visy, with focus areas including:
  - current governance structures (e.g., defined roles, responsibilities, accountabilities, reporting lines and forums to communicate key ESG information)
  - modern slavery risk management and compliance practices.
- The ESG framework, processes and controls which have been implemented to support our commitment to sustainability, and organisational alignment with the ESG strategy and key objectives.

The key action items coming out of this audit will be summarised in the FY2024 Statement.

## **Policies and procedures**

We have a range of policies and procedures which address modern slavery in our own business, as well as our supply chain.

#### **Supplier Code of Conduct**

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

We conducted a review of our Supplier Code of Conduct in FY2022 with a specific focus on social and ethical procurement. This included strengthening our 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
- minimising environmental impacts.

In FY2023, our updated Supplier Code of Conduct was rolled out with:

- internal communication to our Purchasing and Global Procurement teams on the changes to it in November 2022
- publishing it on our website
- all new suppliers being required to sign it from 1 January 2023.

#### Systems

In FY2023 the vendor onboarding process and systems were reviewed and updated to enable reporting, insights and audit into the supplier risk reviews conducted. In particular, with a focus on high risk rated suppliers. This includes the introduction of the Procurement Excellence Team capturing further information when reviewing vendors as part of the onboarding process. Details required to be captured include who conducted the review, how the review was completed, the risk rating applied and type of risk present.



#### **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 FY2023
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.

We achieved 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 in this report. The next review will be conducted in 2024

All existing suppliers on our 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 was reviewed in FY2022, and released in FY2023 (Jan 1). 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. In FY2023 greater than 97% of Suppliers signed the Supplier Code of Conduct. The remaining Suppliers were referred to the Legal Team for further review and action.



# Internal due diligence

#### Labour hire and recruitment

In FY2023, we continued to partner with our labour hire vendors with an ongoing focus on compliance. Together we're ensuring:

- labour hire licenses and working rights are maintained
- training and inductions are completed
- adherence to labour laws and regulations.

#### **Payroll and compliance**

We have invested further in people and processes to bolster our compliance across payroll.

We have implemented a Human Resources Information System (HRIS) globally for increased visibility, reporting, and strengthened systems and processes.

We have implemented our Visy People Dashboard and Recruitment Dashboard through Power Bl. It is a self-serve reporting dashboard which provides quick information to detailed reports including age, gender, leave and other key demographic information.

We have implemented a monthly stewardship meeting to identify proactive approaches to internal self-audits of which we have committed to auditing leave, pay variations, and superannuation.

We completed an external review of our Superannuation Contribution Guarantee obligations in partnership with an external auditor, and worked with the Australian Tax Office to report and finalise outcomes.

We implemented Single Touch Payroll 2 for our Australian businesses.

An internal yearly review of third party security suppliers' wage rates is currently underway.

#### Verifying work rights

Work rights checks are mandatory for all new employees in Australia and New Zealand. Checks for new employees are conducted by a third party supplier, a 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.

#### **Minimum ages**

We comply with state based minimum age requirements.

#### Monitoring overtime and rest breaks

We recognise that work can lead to fatigue and associated health effects. This is why fatigue management is a longstanding priority, using comprehensive data analytics and reporting to manage potential fatigue risks in our workforce in compliance with our *Fatigue Management Policy and Procedure*. These metrics (which are updated daily) are reported to the Executive Team on a fortnightly basis. Fatigue risk compliance is used as a key performance indicator of operations. In FY2023, our Fatigue Risk Executive Management Steering Committee approved a new five-year strategy to elevate our *Fatigue Management Policy* to its next stage. It includes further education for employees to enable them to self-monitor their fitness for work.

#### **Sanctions Compliance Program**

With the continuation of the conflict in Ukraine through FY2023, we continued to perform due diligence on suppliers for legal compliance, including sanctions imposed by governments in response to the conflict.

We have a sanctions compliance program which involves performing due diligence on suppliers for legal compliance including periodic reviews of new sanctions imposed by governments. In addition to monitoring publicly available information on the introduction of new sanctions, our 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 promptly reviewed and investigated (as appropriate) to ensure strict compliance with applicable sanctions. It is also a condition of our Supplier Code of Conduct that suppliers must comply with all economic and trade sanctions in the jurisdictions in which they operate, applicable to their 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 selecting our current licensed tool set, we reviewed the tools available to help analyse risk in the supply chain and, in particular, our first line suppliers. As part of this, we reviewed several 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 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.

As part of our internal audit program, these audits were completed in FY2023, with a separate program of work scheduled for FY2024:

- environmental, social and governance framework (FY2023, finalised in FY2024)
- payroll processes and controls Australia, New Zealand, Singapore and China (FY2023)
- Superannuation processes and controls (FY2024).

# Looking at available internal metrics and managing to targets

As part of our measurement processes, we ensure 100% completion on these 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
- covering the relevant training requirements when inducting new employees.

In FY2023, we reported quarterly to SCRRP on these 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
- 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 Procurement Excellence 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 16 November 2023.

ROBERT KAYE Company Secretary, Visy









# Appendix 1 List of reporting entities covered under this joint statement

#### **Visy entity**

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

Please note: a separate modern slavery statement will be submitted by Visy Retail Services Pty Ltd





# FOR A BETTER WORLD

visy.com