



O'Brien®
Modern Slavery Statement
2024



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O'Brien® Modern Slavery Statement 2024

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O'Brien® acknowledges the traditional owners and custodians of country throughout Australia and acknowledge their continuing connection to land, water and community. We pay our respects to the people, the cultures and the elders past, present and emerging.

Message from our CEO

Dear Stakeholders,

I am delighted to be part of this year's Modern Slavery Statement for O'Brien® after taking up the role of CEO in June this year. This is the first O'Brien® statement that I have been part of, and I am filled with admiration and respect for the work O'Brien® has done already in its commitment to address modern slavery.

A highlight of my year has been visiting our key suppliers of windscreen glass, Fuyao and Xinyi. This visit took place in August 2024 and was an opportunity for both myself and members of my senior leadership team to spend time getting to know senior members of our two major glass suppliers and to visit their manufacturing facilities. This meeting was important because it was the first time our team members met with our primary suppliers in their China factories for many years. It was a significant investment of management time but extremely valuable as it allowed us to see and hear directly from both workers and management firsthand.

During my visit to Fuyao, I was extremely impressed by the state-of-the-art nature of the factory. They are clearly an industry-leading organisation who keep safety and employee wellbeing at the centre of what they do.

Having personally lived and worked in China for six years, the company's transparency and investment in both their facilities and their people is amongst the best I have seen in China.

Our visit to the Xinyi factory also left me impressed by their scale and commitment to continuous improvement and support of its people. I am confident that both these companies share our same values of collaboration and care.

Our fifth annual report addresses the topic that continues to be deeply rooted in the O'Brien® DNA and holds great importance to all of us – how we address the exploitation of people entrapped by modern slavery.

Our focus in 2024 has been about consolidating a strong understanding of Modern Slavery both within O'Brien® and with our suppliers. Our focus for 2025 will take that understanding and work with our key suppliers to ensure we continue to partner against all forms of modern slavery in our supply chain.

This Statement is made pursuant to section 13(1) of the *Modern Slavery Act 2018* (Cth). It constitutes the joint statement of the O'Brien® and covers the reporting period 1 January 2024 to 31 December 2024. This Statement has been reviewed and approved by the Board of Directors of each of the O'Brien® companies.

At O'Brien® we understand that modern slavery is not something that only happens overseas, it can happen in Australia as well. The work against modern slavery within our supply chain requires constant effort. We must remain vigilant with our overseas and local suppliers, and across the whole supply chain. It is critical we provide up to date tools for our team members to assist them in their work in this area. This is an ongoing journey.

I wish to acknowledge and thank our team members not only for their ongoing efforts to battle modern slavery both here and abroad, but also for the enthusiasm and energy they bring to the effort.



A handwritten signature in black ink that reads "Miles Wilson". The script is fluid and cursive.

Miles Wilson

CEO and Managing Director - O'Brien®

1. About this Statement

Belron Australia Pty Limited and its related entities (O'Brien®) 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 O'Brien®) and all its controlled entities as defined under the Act, including the entities shown in the diagram, many of which are not operating entities. The main two operating entities are:

- O'Brien Glass Industries Limited ABN 74 00 022 275; and
- O'Brien Group Services Pty Ltd ABN 74 132 161 285

This statement covers the reporting period 1 January 2024 to 31 December 2024 (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* (Cth).

1.1 Overview of O'Brien®

About us

O'Brien® has grown from humble beginnings to become one of Australia's most iconic companies. In 2024, the business celebrated its 100-year anniversary serving Australians in glass and related industries.

With a history of excellent customer service and a desire to continually innovate and evolve, O'Brien® quickly grew and, in 1971, became part of the Belron® Group - the world's leading vehicle glass replacement and repair company, now operating in over 30 countries. O'Brien® continues to be the leader in automotive and home and business glass replacement and one of Australia's most trusted brand names. We pride ourselves on the quality of our employees, our workmanship and our commitment to providing first-class service to every customer.



Our purpose

Making a difference with real care.



Our vision

To become the number one services company in Australia for vehicles, homes, and buildings.

1.2 Consultation and engagement

The Board of Directors of the holding company, Belron Australia Pty Ltd and O'Brien Glass Industries Limited, have the same members, with the Directors of O'Brien Group Services Pty Ltd comprising a smaller Board that includes a subset of Directors of the holding company. The Board of Belron Australia Pty Ltd is responsible for overseeing and approving of the O'Brien® sustainability strategy, including human rights and its annual Modern Slavery Statement. The modern slavery framework is operationalised by the Executive Leadership Team, which sits across all businesses within O'Brien®.

Our group-wide governance approach means business units are consulted regularly, with the Executive of each business unit (each of whom sits on the Executive Leadership Team)

ultimately responsible for managing human rights risks within that business unit. All outcomes are reported annually in this Statement.

The Modern Slavery Working Group reports its findings to the Legal Director, who then reports them to the Executive Leadership Team and the Managing Director on a monthly basis. The Executive Leadership Team endorses the final Modern Slavery Statement prior to its submission and approval by the O'Brien® Board. The Executive Leadership Team has signed off on the preparation and approval of this Statement.

2. Structure, operations and supply chain

2.1 Structure

Belron Australia Pty Limited operates through its subsidiaries within O'Brien®, comprising O'Brien Glass Industries Limited and O'Brien Group Services Pty Ltd. The former provides vehicle and building glass repair and replacement services and the latter, electrical and plumbing services through its network of licensed electrical and plumbing franchisees.

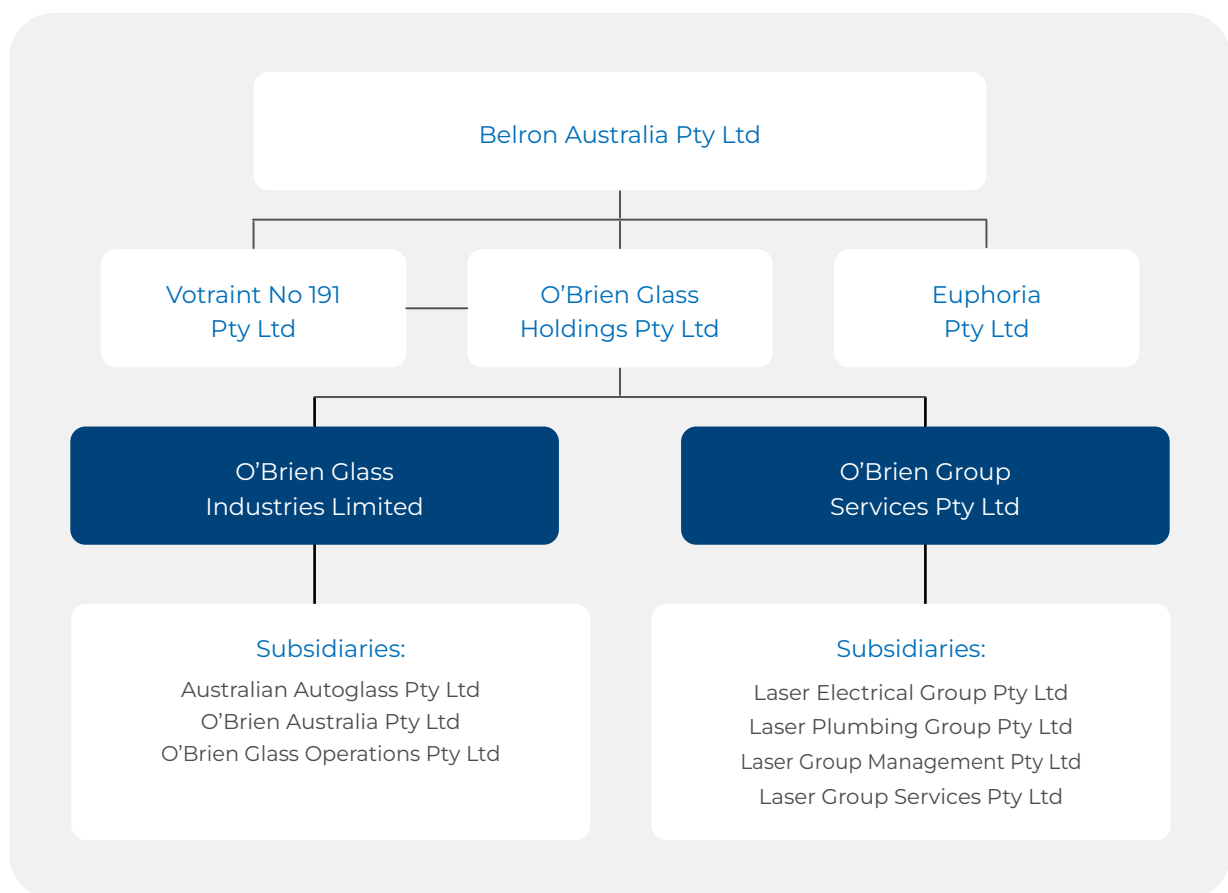


Figure 1 - O'Brien® Organisation Chart All subsidiaries are 100% owned unless stated otherwise. Operational entities shown in dark blue, all others are dormant.

Belron Australia Pty Ltd operates exclusively in Australia, with its headquarters in Padstow, New South Wales. With an annual revenue of approximately \$433 million, our company plays a significant role in the Australian market. As of December 31, 2024, O'Brien® employs around 1,200 people across 71 sites and locations. The majority of our workforce are permanent employees, while 8.7% are either fixed-term contractors or casual workers.

We are divided into three divisions of Automotive Glass, Glazing, and Electrical & Plumbing, supported by a shared corporate services division.



Automotive Glass division

Repair, replacement of vehicle glass and associated windscreen camera recalibration services. This division includes a contact centre based in New South Wales with approximately 150 seats. It also consists of the required operations to support the services, such as importing vehicle glass and ancillary products, and distribution centres around Australia. The services are provided through our employees and approximately 90 subcontractors who are licensed to provide these services under the O'Brien® brand in regional Australia as Authorised Dealers.



Glazing division

Replacing glass in homes and buildings and related products like window film. O'Brien Glass® also provides quality assurance audits. This division is now supported by a contact centre of 20, who work in a mix of sites from the metro branches and at home. This division also consists of the required operations to support the services, such as importing glass and ancillary products. These services are provided by our employees and our network, of approximately 200 non-branded glazing subcontractors, servicing most postcodes where Australians live.



Electrical & Plumbing division

Our network of over 100 electrical and plumbing franchisee businesses provides essential electrical and plumbing services to Australian homes and businesses, employing over 1300 people. Their mobile service sees approximately 800 trade vehicles on the road delivering services in all States around Australia. Our division employs a small group of employees providing these businesses with operational, administrative, marketing and networking support services.

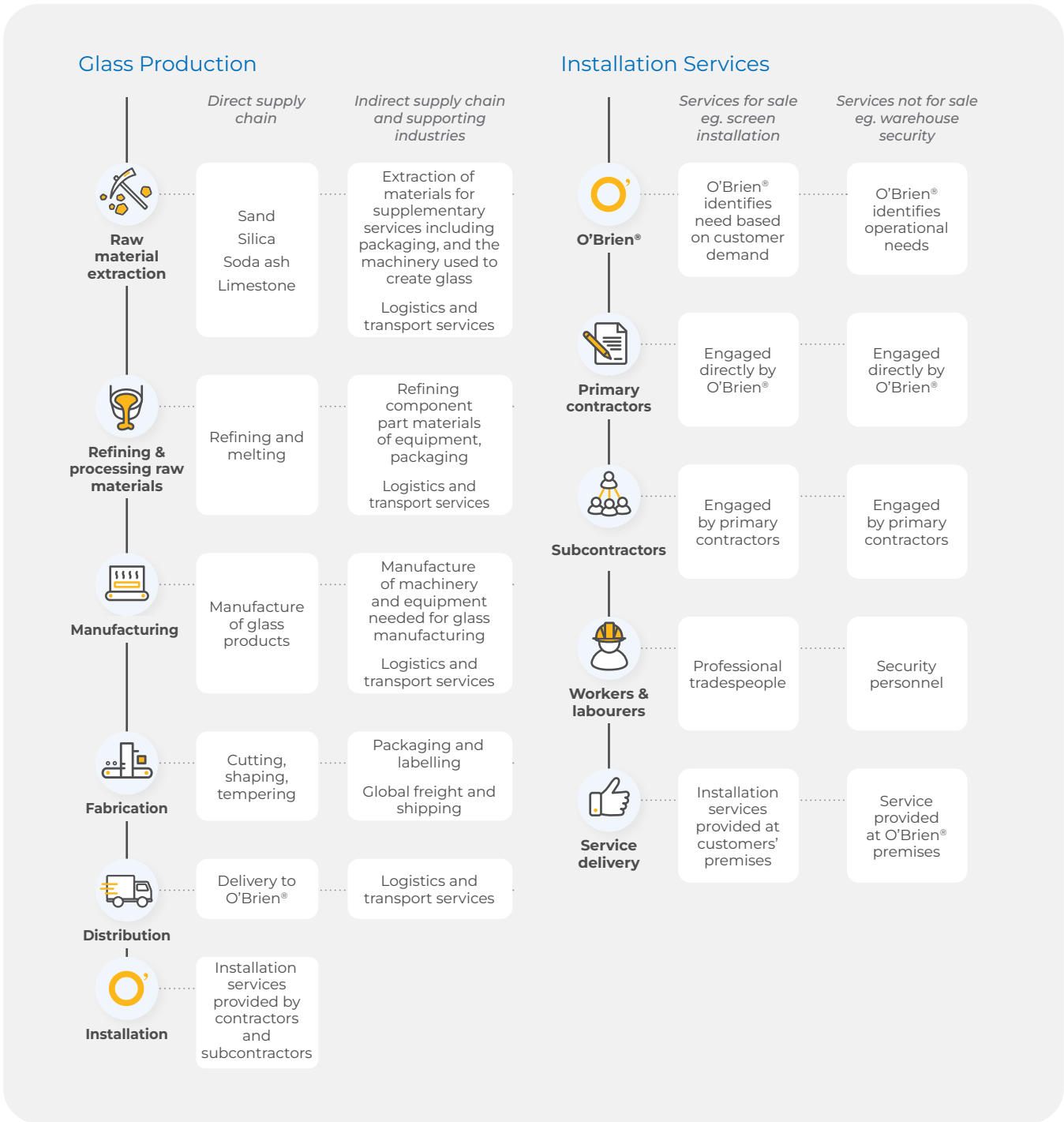
Support services

Includes the everyday operations of corporate offices and support for the three divisions, plus executive, HR, finance, IT, procurement, legal, sales, marketing and central administration functions. Some business support services are provided by a third-party provider (Acquire) which is based in the Philippines. In our 2022 statement, we reported in detail on our engagement with the Acquire business to ensure that modern slavery risks are identified, managed and mitigated.

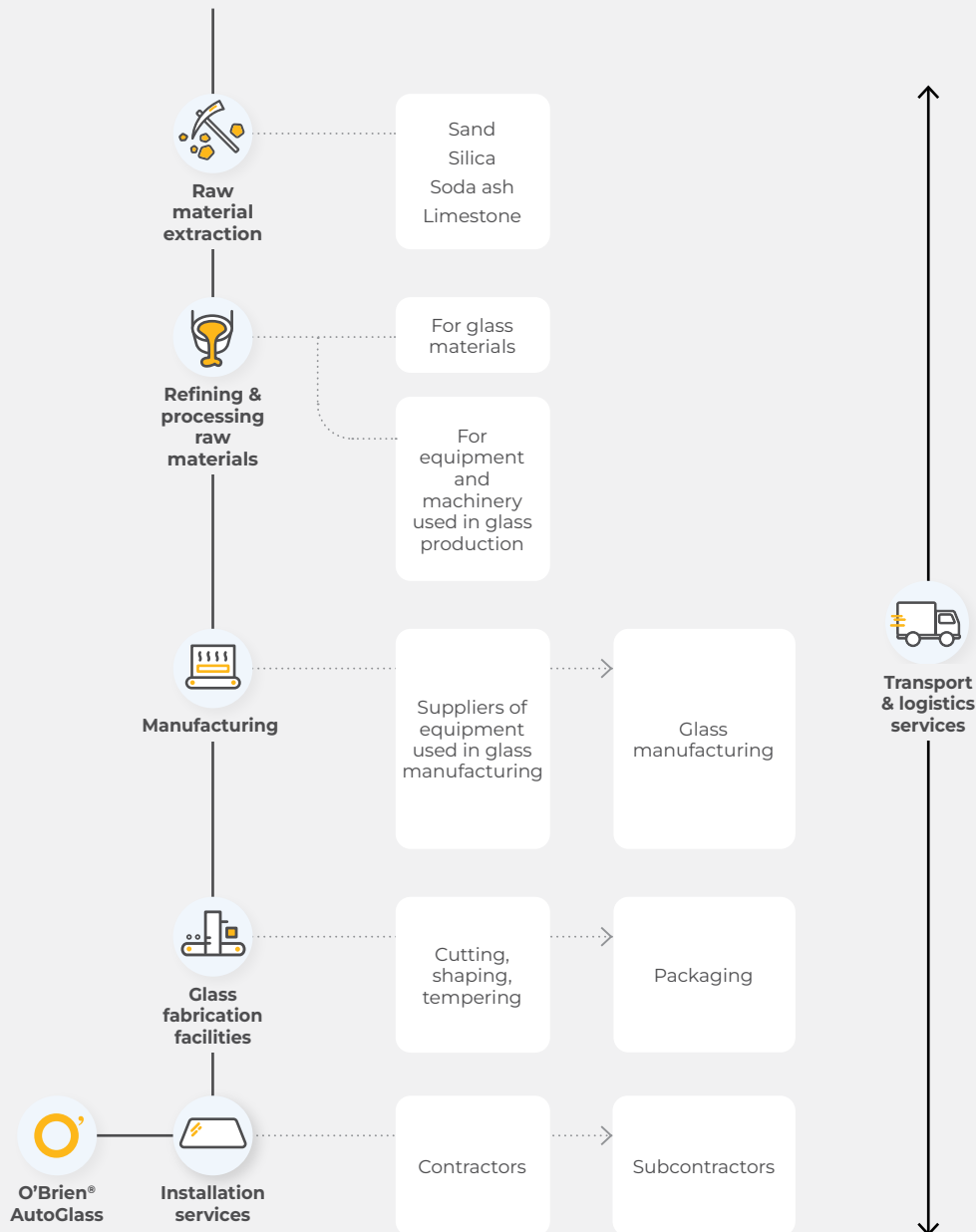
2.2 Supply chain

In 2024, O'Brien® spent \$225 million across 43 procurement categories with 3,506 suppliers. While the majority of the Tier 1 suppliers are located in Australia, the largest spend is from suppliers in Asia for the automotive glass division. In this category, O'Brien® is responsible for glass procurement, and the supplier management is directly controlled or shared with our parent company Belron®.

Key supply chains



Automotive Glass Production



3. Approach to risk management

The Modern Slavery Workgroup review of O'Brien® modern slavery produced the 2024-2026 Roadmap. The 2024-2026 Roadmap has continued to guide and support our approach to Modern Slavery Risk Management.

During 2024, O'Brien® continued to take a proactive approach, assessing and allocating risk at the category and supplier levels to manage modern slavery risk and create a positive impact.

3.1 Evolution of risk assessment and prioritisation 2021-2024

At O'Brien®, we consider it best practise to regularly check that our processes are fit for purpose. It is no different from our approach to modern slavery. Our journey began in 2021 with a detailed social risk assessment that evaluated risks such as forced labour, excessive working hours, and exploitation of migrant labour among others using the outputs of that assessment and giving consideration to level of spend and the inherent transaction risk. The level of risk for 40 procurement categories was determined based on spend and the inherent transaction risk of the industry. O'Brien® prioritised the outputs of that assessment to define priority risk areas by considering our level of influence and control, as well as the latent risks identified. The priority levels were then determined based on the visibility O'Brien® has into the supply chain and our leverage with suppliers. Categories with high latent risk and high O'Brien® level of influence were designated as high priority.



The categories identified were vehicle glass, our Authorised Dealers (vehicle glass subcontractors), flat glass and local branch cleaning services. Other categories like office products, vehicle manufacturer supplied glass, and tools for our own use were also identified as risk areas but with varying levels of O'Brien® influence. Subcontractors in glazing as a category and offshored labour were also included, given their importance to our business and mostly involved direct labour input. Our risk assessment has evolved since 2021.

In 2023, we again reviewed the various categories of supplier risk as part of the process of developing our 2024-2026 Roadmap and decided to continue in 2024 on our previous work in targeting the seven higher risk categories of risk where we believed that we have the ability to influence our suppliers. These categories were:

- automotive aftermarket glass and related suppliers such as suppliers of spare parts and materials required to repair or replace windscreens;
- automotive Authorised Dealers;
- flat glass sourced in Australia;
- cleaning services to our head office and four major service centres in metro areas;
- office materials;
- automotive glass original equipment (branded materials); and
- tools for own use.

The purpose of the activities undertaken was three-fold. Firstly, we sought to ensure that we were, and are, doing business with like-minded businesses that have the prevention of modern slavery at the core of their procurement activities. Secondly, we use our influence and resources to support growing the awareness and understanding of modern slavery issues abroad and in Australia. And finally, this activity reinforces to our suppliers that this is simply the way we do business.

3.2 Global and local procurement

Many of our highest-risk products are procured through supply channels created and monitored by the Procurement Risk and Sustainability Team within our parent company, Belron®. Purchasing via this pathway allows us to leverage their influence to better control the risks to people inherent in these supply chains.

Global sourcing



Global procurement policy: The Belron® Procurement Risk and Sustainability Team (Global Team), based at the Belron® Group Head Office in the UK, is responsible for global procurement policy and human rights due diligence on major suppliers of products and services to the Group. To support this, the Global Team has a sophisticated programme of bespoke social and environmental assessments and on-site audits. Critical work for the Global Team in 2024 was the development and launch of the Global Procurement Policy.

The new Global Procurement Policy provides a comprehensive set of standards to help govern the Group's procurement activities across all business units throughout the world. It is aimed at ensuring that our procurement processes are conducted with integrity, transparency, and a sufficient focus on risk, sustainability, and value for money.

Global due diligence programme: The Global Team regularly conducts risk assessments of global suppliers to identify social and environmental risks, including modern slavery. These assessments are updated regularly and utilise both remote and on-site audits. For on-site audits, a bespoke methodology is used that is aligned with the Belron® Supplier Code of Conduct as well as applicable labour, health and safety and environmental legislation. Audits cover various subjects, such as modern slavery, health and safety, environment, labour, and values as well as including direct dialogue with workers at production sites, which is conducted in local languages. Belron® collaborates with global third-party audit providers, to conduct remote and on-site audits. The results of these audits, including any non-compliances, are communicated to Belron® for appropriate follow-up and corrective actions. None of the risk assessments carried out in 2024 for strategic global suppliers of O'Brien® identified any instances of modern slavery.

However, Belron® recognises that these types of audits can offer only a snapshot in time and may not always be effective in detecting pernicious issues such as forced labour or debt bondage that are embedded deep within supply chains. Additionally, there is limited value in repeatedly auditing persistent issues, such as higher working hours unless steps are taken to address them. Accordingly, the Global Team is developing additional routes to risk assessment that focus more on direct dialogue, with the aim of understanding the impact of issues such as higher working hours on the welfare of staff and employees, rather than simply reporting that it is happening. These will start to be rolled out in 2025.

The Global Team has also developed end-to-end supply chain assessments, which go beyond Tier 1 suppliers, to assess risk in the further reaches of the supply chain. In 2024, one of these assessments was carried out at Fuyao in China, a key strategic supplier to O'Brien®. The Global Team visited Fuyao's manufacturing plants and the sand mining operation that supplies them, assessing social and environmental risk and management in place from raw material extraction to finished product. No indicators of modern slavery were found, and comprehensive risk management processes were in place through the supply chain.

Belron® always aims to have open and effective dialogue with its suppliers. In 2024, the Global Team also visited Xinyi Glass in Dongguan, another key strategic supplier to O'Brien®. The visit included discussions on their plans for the future, greenhouse gas emissions reduction and employee welfare. Good practices noted during the visit were strong forced labour policies in place, employee benefits such as free meals and transport and apprenticeship schemes for school leavers.

O'Brien® managed procurement: Locally, O'Brien® has continued to seek to leverage its supplier self-assessment questionnaire to assess local (Australian) supplier approaches to modern slavery for some categories of procurement.

In 2024, O'Brien® continued to make modern slavery awareness and prevention a key component of our procurement activity through self-assessment questionnaires, making the requirement to comply with our supplier code of conduct a contractual requirement of our supply agreements and through education. It is simply the way we do business, and our suppliers rise to the required standard.



3.3 Category level risks

In our Modern Slavery 2024-2026 Roadmap, we have continued to focus on the seven higher-risk categories previously identified (listed in the table below) where we believe that we have the ability to influence our suppliers. We had assessed the inherent risk for each category so that we can better understand the extent to which O'Brien® and/or its suppliers potentially cause, contribute or are directly linked to the inherent risk of modern slavery in accordance with the United Nations *Guiding Principles on Business and Human Rights (UNGPs)* and overlaid that against our ability to influence. We have not made any changes to this list because, after reviewing our suppliers, we found that there have been no substantial changes to our business model. While one or two individual suppliers have changed for commercial reasons, this has not impacted our approach to supply chain governance.

Within these categories, we then utilised a combination of local and global team members to manage the supply chain, as shown in our Governance table.

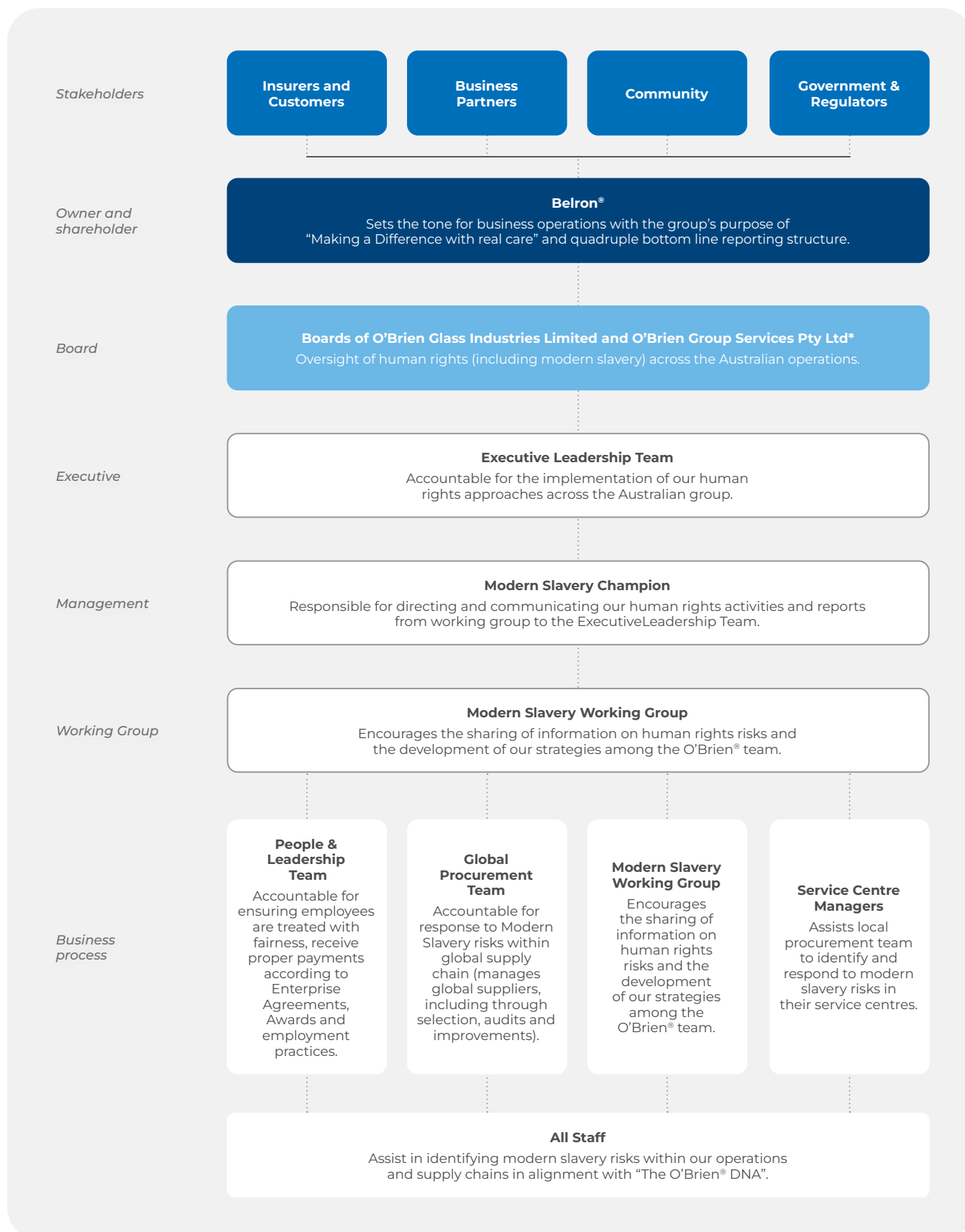
Category	Latent risk	O'Brien® level of influence	Description of risk
Automotive aftermarket glass	 High	 High	Our glass procurement supply chains, being the largest category of spend, present significant modern slavery risks. These risks involve the exploitation and mistreatment of individuals engaged in glass production, including forced labour, child labour, debt bondage, human trafficking, and hazardous working conditions. Factors such as raw material extraction, labour-intensive manufacturing, subcontracting, employment of migrant workers, and lack of transparency contribute to these risks. It is important to note that when our materials are sourced and supplied by our parent company (roughly 90% of our spend in this category), we have better leverage to monitor compliance with our requirements. Our visibility into our supply chain and influence with suppliers in this category when we purchase direct is lower.
Flat glass sourced in Australia	 High	 Low	Although sourced in Australia, this category has the same inherent risks as Automotive aftermarket glass above given the manufacturing of glass in this category.
Cleaning services to service centres	 Very high	 High	Labour-intensive services like cleaning pose a higher risk of exploitative practices due to reliance on a temporary and irregular workforce. The presence of migrant workers further increases the likelihood of debt bondage and visa exploitation. Use of indirect labour often through agencies by these suppliers reduces visibility and oversight over payment and contract terms. This lack of oversight extends to contracted labour for diversified service support, including cleaning.
Automotive – Authorised Dealers	 Low	 High	Risks in this category come from two sources. Firstly, we have the same risks within our materials supply as for aftermarket glass as we supply this glass to our Authorised Dealers. Secondly, there is a risk of exploitation within the labour force. Within our Authorised Dealers, subcontracted labour carries modern slavery risks associated with potentially exploitative working conditions, wage underpayment, lack of employment protections, debt bondage, vulnerability of migrant workers and limited transparency and oversight of their employment conditions. While the latent risk is lower compared to other subcontracted labour arrangements due to the requirement for skilled technicians. Our visibility into our supply chain and influence with suppliers in this category when we purchase direct is lower.
Office materials	 High	 Low	The procurement of office materials involves complex and multinational supply chains, making it challenging to gain visibility into the conditions faced by workers. Materials commonly procured for office use, such as food products, stationery, and textiles, pose high risks of complicity in modern slavery beyond our direct suppliers. These risks can arise during the extraction of raw materials, manufacturing, and processing, subcontracting and outsourcing, transportation and logistics, as well as packaging and distribution. Exploitative working conditions, forced labour, hazardous environments, and inadequate wages are among the dangers that workers may face.

Category	Latent risk	O'Brien® level of influence	Description of risk
Vehicle glass Original Equipment (branded materials)	 High	 Low	The procurement of original equipment (branded products) carries specific risks related to modern slavery. The complexity of global supply chains and the pursuit of cost-effectiveness can increase the likelihood of labour exploitation and violations of workers' rights. Competitive market pressures may lead to subcontracting to less regulated entities, further exacerbating the risk. In this category, we acknowledge the increased challenges regarding supply chain visibility and have less leverage with our suppliers.
Tools for use	 High	 Low	The procurement of glazing tools poses risks of modern slavery throughout the supply chain. These risks include the extraction of raw materials, manufacturing processes, subcontracting arrangements, transportation, and distribution. Factors such as low-skilled labour, unregulated working conditions, lack of transparency, and subcontracting to unauthorised or unethical entities can increase the likelihood of modern slavery practices.
Glazing subcontractors	 Low	 Low - Medium	Subcontracted labour in the glazing industry in Australia poses modern slavery risks, including exploitative working conditions, wage underpayment, lack of employment protections, debt bondage, vulnerability of migrant workers, and limited transparency and oversight of their employment conditions. While the latent risk is lower compared to other subcontracted labour arrangements due to the requirement for a skilled workforce, preventive measures and monitoring are still necessary to address these risks effectively.

4. Addressing and mitigating risks

4.1 Organisational strategy

Our governance structure and policies remained unchanged in 2024, continuing to serve as the foundation for our response to human rights risks, including those related to modern slavery. They are designed to embed the core values and principles of O'Brien® and provide a clear framework for identifying and addressing modern slavery risks. They reflect our cultural understanding that managing these risks is a shared responsibility across our organisation, promoting a structured, consistent, and coordinated approach. Through this approach, we aim to effectively mitigate modern slavery risks and uphold our commitment to ethical practices.



*These are the only two operating companies within the group, all 100% owned by the holding company in Australia by Belron Australia Pty Ltd.

4.2 Policies and procedures

Relevant O'Brien® policies and other documents are publicly available on the Corporate Social Responsibility section of our website obrien.com.au/corporate-social-responsibility. Together, and in conjunction with our due diligence framework, they set out our expectations of all O'Brien® team members and suppliers in relation to modern slavery.

Document title	Overview
 Code of Conduct - "Our way of working"	"Our Way of Working" is a comprehensive set of ethical guidelines and principles that govern the behaviour and actions of employees at O'Brien®. It sets clear expectations for conduct, emphasising integrity, honesty, respect, compliance with laws and regulations, confidentiality, avoidance of conflicts of interest, and responsible business practices. This resource equips employees with practical tools, including scenario examples and an ethics checklist, to make informed decisions guided by our core ethical principles of integrity, respect, and trust. In 2024, every employee undertook training on the Code of Conduct and was asked to individually sign up to its terms.
 Human resources Policies	Our dedicated People and Leadership Team oversees our employment and workplace health and safety policies which include policies governing the employment relationships with our staff. These cover areas such as recruitment, performance management, grievance management, training and development, wellbeing health and safety, leave, benefits, flexible working, workplace giving and termination. Their purposes are to ensure fairness, compliance and a positive work environment. Our People and Leadership Team sourced many employees from overseas during 2024, always ensuring the proper legislative requirements were met. There was no third party sourcing of personnel in 2024.
 Modern Slavery Policy	Our Modern Slavery Policy aligns with the <i>United Nations Guiding Principles on Business and Human Rights</i> and the <i>Modern Slavery Act 2018</i> (Cth). It 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. It sets out our commitment to the elimination of modern slavery, human trafficking, and all kinds of exploitation practices and expectations of our suppliers.
 Supplier Code of Conduct Policy	Our Supplier Code of Conduct applies to all of our suppliers. It sets out the minimum standards of behaviour that O'Brien® expects its suppliers (and suppliers in their own supply chain) to meet in the areas of labour and human rights, health and safety, environment, business integrity, privacy and supplier diversity. The Supplier Code of Conduct is provided to suppliers as part of our procurement processes and is incorporated into contracts. New suppliers must agree to the Supplier Code of Conduct as part of the onboarding process. The Supplier Code of Conduct also forms part of competitive procurement processes so that prospective suppliers are made aware of requirements very early in any supply relationship.
 Due diligence framework	The O'Brien® due diligence framework includes risk assessment, supplier engagement, audits and monitoring, contractual safeguards, training and awareness, remediation and grievance mechanisms, collaboration, and reporting for addressing modern slavery risks. The Global Procurement Risk and Sustainability Team now (from 2024) has its own Due Diligence Framework which achieves a similar outcome.
 Whistleblower Policy	The O'Brien® Whistleblower Policy is designed to promote and support a culture of honest and ethical behaviour within O'Brien®. It encourages employees to speak up about any potentially corrupt, illegal, or concerning conduct. The policy applies to all businesses within O'Brien® and covers various individuals, such as directors, employees, contractors, and suppliers. Stakeholders have the option to use this publicly accessible mechanism to report indicators of modern slavery risk.

4.3 Capability and awareness

Both staff and suppliers receive or are offered training on modern slavery. In 2024, O'Brien® continued to provide bespoke training on modern slavery for executives and key procurement staff via internal delivery.

Educating our people: Service Centre Managers in the Auto division and Branch Managers in Glazing, who do small amounts of local procurement are required to undertake online awareness training using our internal training system. We plan to roll this awareness training out to all staff in 2025.



Influencing our industries: In addition, building on previous training materials we created for our business partners, we shared customised training with the glazing association in 2024. The Australian Glass & Window Association comprises mostly small businesses and O'Brien® is a clear industry leader within this group. We reached out to the Association to collaborate, raise awareness and better inform their membership on modern slavery. This is an ongoing project and we will continue to work on this project with them throughout 2025 whilst also supporting our own activities in this space.

4.4 Supply chain assurance principles

O'Brien® adopts a proactive approach to ensure effective management of modern slavery risks within our operations and supply chains. This encompasses various activities that align with different stages of the procurement cycle - planning, sourcing, and management. These activities are designed to enhance our risk assessment and supplier due diligence processes, enabling us to identify and address modern slavery risks effectively.

An overview of the key activities is set out below, categorised according to their respective stages in the procurement cycle:

Procurement cycle stage	Initiatives
Plan	- Communicating the Supplier Code of Conduct and the Modern Slavery Policy to most of our new suppliers during the onboarding process. Suppliers are required to agree to the Supplier Code as part of their engagement with us. - Assessing and establishing category risk profiles to inform supplier prioritisation and risk allocation.
Source	- Undertaking risk assessment and due diligence of high-risk suppliers to evaluate potential modern slavery risks. - Engaging high-risk suppliers through our modern slavery questionnaire or conducting site audits, as appropriate. - Incorporating modern slavery expectations and minimum requirements into supplier engagement and selection processes.
Manage	- Embedding modern slavery clauses into new and existing supplier contracts to ensure compliance with our requirements. - Review and implement, where required, our auditing program to include high-risk suppliers with a heightened focus on modern slavery. - Maintaining continuous engagement with identified high-risk suppliers and critical suppliers to assess their performance and risk levels, actively encouraging ongoing improvement over time.

Through these interventions, we operationalise our commitment to promoting transparency, accountability, and responsible practices throughout our supply chains, mitigating the risks associated with modern slavery and ensuring a responsible and ethical procurement process.

4.5 Supplier monitoring and management

Global activities

O'Brien® is conscious of the impact in its supply chain of overseas suppliers. While O'Brien® is conscious of and hugely grateful for the support given to our supply chain management of overseas suppliers by the Global Procurement Risk and Sustainability Team, it does not solely rely on their expertise and bespoke due diligence programme. Where possible O'Brien® engages directly with key suppliers both remotely and in person.

In August 2024 a team from O'Brien® comprising the CEO, Operations Director, and members of the senior supply chain team, visited the factories of key suppliers Xinyi and Fuyao. This visit enabled the O'Brien® Team to gain first-hand insight into how suppliers not only cooperate with modern slavery requirements, but also how they go above and beyond for their employees. The case study on the following page describes the highlights of this visit, observed first hand by the O'Brien® team with key supplier Fuyao.





Case study - Fuyao

Fuyao is an important glass supplier not only to O'Brien®, but also to other Belron® countries. The O'Brien® team found several key trends that set Fuyao apart from other similar factories. The Fuyao factories were equipped with advanced technology, which was ahead of what members of the O'Brien® team had seen elsewhere. Our Director of Operations, being a seasoned visitor to manufacturing plants over the past 20 years particularly noted the quality of the polished concrete floors and the presence of plants to improve air quality creating a pleasant and well-maintained environment. The cleanliness and organisation of the facilities provided to employees were also impressive.

Safety was clearly a top priority at Fuyao. From what the O'Brien® team observed the workers adhered to safety protocols, wearing personal protective equipment (PPE), with safety frameworks displayed prominently on the walls. This emphasis on safety demonstrated the company's commitment to putting its employees first.

The focus on employee wellbeing and culture was evident throughout the visit. Motivational statements were visible, and there was a strong theme of looking after employees. The dormitory facilities (where many of the employees lived with their families) had amenities such as basketball courts, gyms, and cafeterias that provided free meals. This level of care for the workers was impressive and showed a genuine commitment to their wellbeing.

The O'Brien® team was impressed by the transparency throughout the visit over two days. They were allowed to explore different areas freely and were able to interact with workers without any restrictions. They were accompanied by members of the Fuyao team who readily answered questions.

Fuyao's investment in research and development was another highlight. The advanced facilities for testing and innovation, including patented technologies like nano-coating glass, showcased their commitment to continuous improvement and staying ahead in the industry.

Fuyao also offered competitive wages, which contributed to a low turnover rate and good employee retention. Workers reported having a comfortable living wage, which was encouraging to hear. Additionally, Fuyao funded education for employees and was opening a new university with a focus on engineering. As part of this education drive, Fuyao was offering discounts to their employees. This investment in education further demonstrated their commitment to employee development.

Overall, the morale among employees seemed positive. Workers appeared content and motivated, and young leaders were open to discussing challenges and improvements. There was a general desire among employees to work for the company, which was evident in their attitudes and interactions.

In addition, the O'Brien® team spent time with another key supplier offshore, Xinyi. Xinyi supplies glass to the Australian and New Zealand businesses of Belron®, and is an important supplier for these businesses who are located so far from European and other supply locations.

In 2024, the O'Brien® team was fortunate to briefly visit a Xinyi factory. This was a first for the O'Brien® team, although Belron® representatives had visited on our behalf in the past and many meetings over the years had been held with Xinyi management. During the visit, the local team at Xinyi eagerly shared the quality improvements they had made. The O'Brien® team was happy to see good evidence of workers' rights being respected with behaviours that included workers taking their breaks and clocking off at designated times. Xinyi also supported the wellbeing of their staff by providing facilities for staff such as a cafeteria and accommodation.

The O'Brien® team was impressed by the clear efforts Xinyi is evidently making to reflect and grow in their approach to working conditions in the factory. The Xinyi team were eager to engage with O'Brien® and share ideas and proposals for further improvement, acknowledging these matters are part of the journey we are all on. The main takeaway was the good working conditions overall were obvious to the O'Brien® team. O'Brien® wants to acknowledge and congratulate Xinyi on its conscious efforts to reflect and grow in its approach to working conditions in the factory. Xinyi and O'Brien® agreed to continue to work on this important aspect of business together.

Local activities

In 2024, the local O'Brien® procurement team undertook a range of activities with local suppliers including:

- A key procurement activity for 2024 was to ensure that the previously created templates for request for proposals (RFP) and questionnaires were used proactively in 2024. Accordingly, in 2024 a competitive RFP that was undertaken to establish a three year agreement to supply our national stationery products utilised these procedures. As part of the requirements, O'Brien® asked participants in the process to present and reply to scope of work questionnaires which included topics of Modern Slavery, First Nation products and Gender Equity.
- We have a mature relationship with our main cleaning company who provides cleaning services to our Head Office at Padstow, some Sydney Service centres and all our National Service Centres and in 2024 were able to deepen our understanding with their people. With a mutual understanding of our policy, as discussed with their management, we were given permission to approach all the individual O'Brien® cleaners to discuss and verify their individual understanding. It was important to us that they understood that they could and were encouraged to report any case of suspected modern slavery to O'Brien®. In addition, we reviewed and checked in detail the supplier's recruitment processes which are robust and gave our team great comfort.

- Uniforms are purchased both locally and from overseas suppliers. Our current supplier was engaged on the topic of modern slavery and provided evidence of modern slavery prevention in their process. Specifically, we asked them to demonstrate with examples where they had carried out their policy and they shared with O'Brien® their guidelines and internal policies. They also shared reports received from actions taken overseas for the suppliers they buy garments from confirming they action their policy. This was a good example of working with an important member of our supply chain to delve deeper into the supply chain.



Collaboration locally and globally: The Modern Slavery Working Group (MSWG) continued to meet regularly to discuss matters of relevance to the Business and provide a central focus for our modern slavery prevention activity. The MSWG maintained monthly reporting to the Executive Team as part of usual reporting structure ensuring a high level of awareness and commitment from the business. There is a constant conversation at the executive level and tone from the top evidenced by the involvement of the Managing Director in key supply chain relationships. While new to the business, the Managing Director was committed from the commencement of his tenure to the principles of modern slavery and its importance to how we do business globally and locally.

4.6 Grievance and remediation

Our Whistleblower Policy and hotline comprise our primary system for grievances to be raised. In 2024 no modern slavery specific concerns were raised via our hotline. O'Brien® has a remediation process that provides clear guidelines for addressing instances of modern slavery and responding to concerns raised. The primary objective of this plan is to ensure the protection of potential victims of modern slavery and to guide O'Brien® in determining the most appropriate course of action to support their transition back to their pre-slavery circumstances. Given we have not yet needed to trial it, we remain acutely aware that each case will be unique, and therefore, our approach will need to remain responsive to its complexities.

Our process is based on a set of important principles that guide what we do:

- We put the needs of the victims first and focus on their wellbeing.
- We consider the specific circumstances of each case to make sure our actions are appropriate.
- We are open and honest about what we're doing and keep everyone involved informed.
- We make sure that victims have easy access to the help and support they need.
- We take responsibility for what we do and follow ethical and legal rules.
- We work together with other organisations, like the police and support services, to make sure we do everything we can to help.
- We take action to solve the problems we find and make things better.

By following these principles, we want to create an environment where victims of modern slavery get the support they need, and everyone in our organisation understands their responsibility to make things right.

Given we have not implemented this remediation plan with any supplier, we have added this item to our 2024-2026 Roadmap to further develop our policies in this space and run a hypothetical scenario workshop to ensure that our approach would be appropriate.



5. Measuring effectiveness

5.1 Last year's commitments and performance

In our 2023 Statement we identified 15 activities or commitments from the Roadmap that we wished to achieve in 2024 and we largely delivered on these.

Activity / commitments	Description / goal	Measurement
Embed modern slavery risk reduction through a coherent strategy	Socialise and obtain executive endorsement of the modern slavery Roadmap 2024-2026.	●
Refine key policies and reissue	Update the supplier code of conduct to include a clear definition of modern slavery. Consider reviewing our Whistleblower policy to extend protections in use of Speak Up to internal and external employees/contractors.	●

Activity / commitments	Description / goal	Measurement	
Better establish governance responsibilities and reporting	Develop a governance chart outlining operational responsibilities related to modern slavery and document a consistent framework for the Executive Leadership Teams updates on modern slavery.		
Define escalation pathways	Define the escalation pathway for "reportable events" from grievance systems and/or Belron® audit monitoring.		
Pilot in very high-risk industry	Identify a trusted supplier in a very high-risk industry/geography to develop a supplier specific management plan to pilot approaches.		
Strengthen risk mitigation for high-risk suppliers	Build external awareness around prioritised categories of modern slavery risk.		
Strengthen internal support to help evaluate high-risk suppliers	Develop supplier questionnaire evaluation guidance.		While we do have evaluation guidance, this remains a manual process.
Review and improve purchasing practices	Review purchasing practices around high-risk direct suppliers (Direct Glass Procurement, Cleaning, and Security) to ensure staff are recruited ethically and receive a living wage.		
Review and improve purchasing practices	Review supplier performance management process and establish if suitable checks are in place across supply lifecycle.		Good practices globally which are yet to be rolled out locally.
Build modern slavery awareness	Standardise refresher training for employees in key roles, tailored to the functional responsibilities related to modern slavery including procurement.		
Publish remediation framework	Provide information within the Supplier Code of Conduct on remediation of harm to individuals.		Our Supplier Code of Conduct will be republished in 2025.
Update Modern Slavery Policy for remediation framework	Provide details within the Modern Slavery Policy on how O'Brien® enables effective remedy.		Policy and Statements set out remediation framework.
Pilot/ test remediation framework	Conduct a mock scenario to test the effectiveness of our remedy pathway.		Global Procurement Risk and Sustainability Team is developing additional routes to risk assessment which are focused more on direct dialogue, rather than simply reporting that it is happening.

6. Next steps

6.1 Future commitments

The 2024-2026 Roadmap contains goals for our organisation to continue to embed modern slavery more deeply, through a coherent strategy, to continue to update and refine our policies, to continue with the established governance responsibilities, work with and learn from our suppliers and to communicate the impact. For 2025, our activities will continue this journey laid out by the Roadmap and will be focused on the following:

2025 Goal	Measure
Continue to embed modern slavery by: ■ training and communication to all Service Centre Managers; ■ reviewing our Whistleblower Policy to extend protections in use of Speak Up to internal and external employees/contractors; and ■ communicating the Speak Up line to visitors to our Service Centre premises across Australia.	All new service centre managers complete training as part of induction and all existing service centre managers refresh their training on modern slavery. Communicate speak up line to visitors to our premises.
Review and update Charter or terms of reference for the Modern Slavery Working Group including reporting requirements, to incorporate changes to procurement practices for both local and global.	Executive endorsement of updated Terms of Reference.
We will begin mapping the second tier of strategic categories for high-risk suppliers.	The supply chains of two high-risk categories have been mapped to Tier 2.
Test Suppliers' commitment to the grass roots of their organisation.	Develop and provide a voluntary survey to employees and contractors of one key supplier.
Facilitate a workshop with suppliers of high-risk category items to understand what controls are commonplace; seek to reinforce these as expectations in supply arrangements.	Conduct workshops with two key suppliers in high-risk category items to understand what controls are commonplace. Incorporate/document findings from the workshops in procurement processes.
Create a contract management plan with template agenda for supplier meeting to standardise ongoing dialogue with suppliers through to the life of the supply arrangement.	A map of the contract lifecycle with timeframes to engage in conversations on continuous improvement (relationship management/performance review plan).
Provide procurement specific training to global and local procurement staff with purchasing responsibilities, which identifies our high-risk categories and defines expectations.	Training provided to 100% of key team members who undertake procurement activities in high-risk categories.
Re-engage with Belron™ Group following launch of Belron™ Group Procurement Policy for routine knowledge sharing.	Quarterly meeting with Belron™ Group on common Modern Slavery matters.
Publish Remediation Framework.	Provide information within Supplier Code of Conduct on remediation of harm to individuals.

