

2024 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 2023 to 30 June 2024. 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 manufactures 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 committed to making a conscious effort to continue working with countries who place high value on ethical labour and human rights. In all countries in which Viscount Reuse operates, materials and labour hire are sourced locally wherever practicable. By sourcing from within the regions in which its businesses are operating, Viscount Reuse has greater visibility over the organisational structure, processes and practices of its suppliers and is better placed to monitor their activities. This also ensures that Viscount Reuse is well positioned to identify suppliers whose values and approach to modern slavery align with Viscount Reuse's expectations.

Viscount Reuse has geographically diverse and wide-ranging supply chains, and at times may operate in regions where the risks of modern slavery are more prevalent than in others. We expect the same high standards from all of our contractors, suppliers and other business partners within our supply chains.

Direct supply chain

As a supplier of sustainable reuse and recycling solutions, with resin being a key raw material input, Viscount Reuse's direct supply chain is relatively streamlined. As a result Viscount Reuse has significant visibility over its direct supply chains which reduces the risk of modern slavery in its tier 1 suppliers.

Procurement for Viscount Reuse's extended supply chain is managed by Pact. Pact engages with over 6000 suppliers, of which it sources almost 80% of its inputs from countries that carry a low risk of modern slavery according to the Global Slavery Index.

Viscount Reuse acknowledges that modern slavery risks are present in its extended supply chain (including the supply chain of its controlled entities). Viscount Reuse has conducted a review of its procurement from a geographical and industrial perspective and identified that the majority of its procurement does not occur in industries or countries that typically carry a high risk of modern slavery. However it has been identified that there may be additional modern slavery risks associated with manufacturers of plastic resin in Asia as a result of the geographical risks associated with this location.

Labour Hire

Viscount Reuse is conscious of the modern slavery risk associated with temporary/casual labour and aims to mitigate this risk in Australia and New Zealand by concentrating at least 90% of its expenditure in these jurisdictions across three reputable casual labour providers with appropriate anti-slavery processes in place.

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

As noted above, Viscount Reuse contracts Pact to provide procurement support for its supply chain. Actions taken by Pact to assess and address modern slavery, as described below, apply across 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 took a number of actions to improve its management of modern slavery risk, which by extension improve the management of modern slavery risks for Viscount Reuse.

Integrity and Ethical Sourcing Committee

During the previous reporting period, Pact established the Integrity and Ethical Sourcing Committee (**Committee**).

The Committee continues to meet quarterly to:

- evaluate risks and make recommendations as to appropriate actions to be taken in the event that modern slavery risk is identified in Pact's business or supply chain;
- monitor current processes in place to identify new opportunities to improve 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 appropriate training materials for Pact's employees and where appropriate, suppliers; and
- address other issues including anti-bribery and corruption risk, sanctions and ethical supply chain management.

Training

Pact conducted an internal awareness campaign in relation to modern slavery. The awareness campaign was promoted through an employee newsletter and intranet banner and required Viscount Reuse employees to watch a training video which outlined key modern slavery concepts and 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 requires all suppliers and vendors to acknowledge and commit to our Modern Slavery Policy as part of their registration.

In respect of Pact, the engagement of significant suppliers involves conducting tenders and requests for proposals which require participation in a due diligence process. The due diligence process varies by jurisdiction but 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.

Through the information provided, Pact is able 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 its supplier management platform across the organization. Pact has also explored alternative methods (including third party solutions) to enable it to better, and more comprehensively, assess 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 supplier due diligence processes or other channels are to be reported to the Committee. Pact's procurement team has kept abreast of specific developments in relation to modern slavery risks relevant to 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) contain provisions including:

- (a) requirements that Pact's suppliers act in an ethical and socially responsible manner;
- (b) requirements that Pact's suppliers become signatories to and adhere to the principles of the United Nations Global Compact;
- (c) requirements that Pact's suppliers comply with Pact's applicable policies and codes of conduct;
- (d) warranties that Pact's suppliers will ensure 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 Pact's suppliers will maintain appropriate policies and procedures to ensure compliance with the modern slavery legislation;
- (f) warranties that Pact's 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 on Pact's standard terms, customised provisions addressing modern slavery risks are incorporated into the relevant contract

4 How Viscount Reuse assesses the effectiveness of its actions

Currently, Pact as part of its services to Viscount Reuse assess the effectiveness of its actions through various avenues:

- (a) Integrity and Ethical Sourcing Committee – the Committee is committed to reviewing, monitoring and improving current actions taken to address and assess modern slavery.
- (b) Modern Slavery Supplier Questionnaire – Pact is improving its ability to measure the substance and extent of responses received to assess which suppliers are implementing modern slavery measures to mitigate risk (if any).
- (c) Supplier Management System – enables Pact to aggregate data and measure effectiveness of its actions (such as summarizing data on supplier risk levels and suppliers that have not agreed to comply with Pact's modern slavery requirements).
- (d) Training – modern slavery training, has resulted in a demonstrable increase in the level of awareness of relevant Pact employees regarding modern slavery risks and issues.
- (e) Procurement Team Feedback – Pact receives continuous feedback from its procurement team in relation to training and onboarding processes in relation to actions to cease any engagement with 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 .

This statement is signed by Jonathon West in his role as a director of Viscount Plastics Pty Ltd on 24 December 2024.



Jonathon West

Director of Viscount Plastics Pty Ltd