



MODERN SLAVERY STATEMENT FY24

Viridian[™]
Today. Tomorrow. Together.

Joint Modern Slavery Statement

Viridian Glass Pty Ltd (ACN 006 904 052) (“Viridian”), and its subsidiaries that are listed below, have a registered office at 8 Williamson Road Ingleburn NSW 2565

All subsidiaries include:

Company Name	ACN
Viridian Glazing Pty Ltd	104 391 040
Don Mathieson & Staff Glass Pty Ltd	006 332 556
Viridian Glass Investment Company Pty Ltd	064 555 924
Viridian Properties Limited	007 510 447
Viridian International Pty Limited	010 675 699
Vivid Glass, Windows and Doors Pty Ltd	633 369 990
Viridian Glass Operations Pty Limited	004 158 909
SA Independent Glass Pty Ltd	008 285 532

Viridian is a privately held Australian company.

Viridian is committed to limiting the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.

The related entities have a Director in common, and therefore Directors of all related entities have been consulted with in preparing this Modern Slavery Statement.

This statement is made pursuant to the Act and constitutes Viridian Glass’ Modern Slavery Statement in respect of the 31 March 2024 financial year and is approved by its board of directors.



Neville Buch

Director, Viridian Glass Pty Ltd

Company Overview

Since 1856 we've challenged Australians to think differently about glass, turning a functional building material into something that adds real value to our homes and daily lives.

Today, we're Australia's largest glass processor, dedicated to delivering quality products in full and on time. With a passion for innovation and education, we will ensure our products continue meet the ever-changing needs of our industry.

Embrace the future with us today, tomorrow, together.

Structure & Operations

Operations

Viridian's core business is being a processor of float and laminate glass products across Australia. Additionally, our reporting entities include businesses performing window fabrication and glazing. Operations are in all states except WA, with varying capabilities at each site. Glass processing includes cutting, polishing, toughening, laminating and making Insulated Glass Units (IGU's). Window fabricating is the process of putting glass in frames, and glazing is the installation of glass, windows and doors. All processed products that Viridian sells are manufactured in our factories located throughout Australia.

Employees

Viridian employ ~690 people in Australia and 11 in Manila (Philippines) including head office functions. Processing operations and our workforce vary by state, with some sites operating 24 hours per day Monday to Friday and others 1 shift per day.

Supply Chain Structure

Viridian has a dedicated procurement function including the National Operational Excellence Manager, Procurement Manager and Purchasing Assistant. Glass represents 48% of our purchases, which are made predominantly through one supplier. The contract for this supply is negotiated jointly with our CEO and Procurement Manager and includes activities on ensuring quality control and safe supply of products. For other key costs such as consumables and energy, the Procurement Manager performs activities such as identification and contracting for supply, quality assurance and audit where applicable.

Products and Services in Viridian's Supply Chain

Glass

Viridian source most glass from a local Australian Glass manufacturer. Some of the glass used in production is not manufactured in Australia and is sourced from overseas (see table 1 below for detail).

Processing

Viridian and its subsidiaries source consumables and aluminium to be used in the production of IGU's, custom laminate and window or door frames. Other large production inputs include energy, maintenance consumables and spare parts for machinery. Many of these processing consumables and maintenance consumables/parts are manufactured overseas, sourced through both local and overseas suppliers. Our processing operations, fabricating and glazing all occur in Australia where we directly employ our workers in addition to using labour hire agencies when necessary.

Dispatch

Viridian use a combination of direct employment of drivers and using third party logistics providers to deliver products between sites and to customers.

Risk of Modern Slavery Existing within Operations and Supply Chain

Viridian has assessed the risks of modern slavery in our operations and supply chains over the reporting period to consider the risk that we are causing, contributing, or directly linked to modern slavery practices.

Operations

We consider Viridian's manufacturing operations as low risk for modern slavery practices. This is because they are all conducted in Australia and governed by an Employee Code of Conduct and Modern Slavery Policy which outline human rights considerations on site. These are underpinned by Viridian's Whistleblower Policy which supports the anonymous and protected reporting of any breaches. In addition, Viridian consults with Unions when negotiating EBAs for our manufacturing sites.

The addition of Viridian's workforce based in the Philippines could be considered higher risk. To mitigate this, Viridian have engaged with a reputable labour hire agency in the Philippines to recruit and employ the workforce on our behalf. Work expectations and conditions of employees in the Philippines are the same as those in similar roles in Australia. Team leaders frequently visit the Manila office to ensure our high standard of working conditions are maintained.

Supply Chains

Viridians supply chain contains a mixed risk profile. The risks of modern slavery in the supply chain of glass have overall been assessed as low-med. Of the products we purchase from our main glass supplier, 80% are manufactured locally in facilities that comply with modern slavery requirements and with controls in place for their own operations to address Modern Slavery risks.

In addition, we obtained evidence that our supplier assesses and audit their overseas suppliers for compliance to Modern Slavery laws. This is what contributed to the low score for supply from the next largest source, India. The third largest source by volume is China and Viridian are working closely with

suppliers to verify their responses to our Anti-Slavery Questionnaire.

The risks of modern slavery in the supply chain of production consumables have overall been assessed as low-med. The bulk of products are sourced from Australia, Europe and USA which are all considered regions of low risk. China and Korea are countries we source product from, and Viridian continue to work with suppliers to understand and reduce risk on a supplier-by-supplier basis.

Manufacturing Inputs	Source	%	Risk
Glass	Australia	80%	Low risk
Glass	India	11%	Low risk
Glass	China	6%	High risk
Glass	Europe/USA/Other	3%	Low risk

Table 1: Purchased glass by Country during 31 March 2024 financial year.

Actions Taken to Assess and Address Modern Slavery Risks

Viridian understands that modern slavery in the context of business is a complex and global problem that may present in various forms. To actively identify and address modern slavery across its suppliers and employees, Viridian has taken the following actions:

Established Anti-Slavery Governance

The Executive Board has overall responsibility for enacting Viridian's Modern Slavery Policy and ensuring that Viridian complies with all its legal and ethical obligations.

The Chief Executive Officer (CEO) has the primary day-to-day responsibility for the implementation of the Modern Slavery Policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

Reviewed and Updated the Suite of Policies and Procedures

In prior years Viridian developed a suite of policies and procedures to measure and address risk of modern slavery in operations and supply chain, including

1. Establishing a **Modern Slavery Policy** which applies to all persons working for or behalf of the Company,

in any capacity, and sets out expected anti-slavery processes and behaviours including for supplier relationships.

2. Implementing a **Whistle-blower Policy** which facilitates the disclosure of reportable conduct being made with full anonymity and outlines the protections afforded to the employee making the report.
3. Updating the **Code of Conduct**.

Identified and Enacted Priority Actions

To underpin the commitments laid out in Viridian's Modern Slavery Policy, Viridian has taken steps towards implementing the following measures through the course of the 2024 financial year:

1. Finalised in September 2023 a review of the policy framework to ensure it meets best practice in respect of modern slavery identification and mitigation.
2. Where appropriate as informed by the risk assessment, Viridian engaged directly with suppliers to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own business.
3. Implemented ongoing Modern Slavery awareness and training by all relevant staff including sign off to confirm compliance and understanding of the Modern Slavery

Policy. This occurs annually in February.

4. Created KPI's to measure the effectiveness of our actions.

Future Actions to Continue to Improve Modern Slavery Risk Management

Viridian will continue to advance its Modern Slavery initiatives through the financial year ending March 2025, as follows:

1. Hire additional resource (Procurement Specialist) in the procurement team to further execute continuous improvement towards anti-slavery identification and rectification.
2. Introduction of a Supplier Code of Conduct.
3. Where possible, revise contractual documentation to incorporate specific prohibition against slavery, servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with Viridian policies.
4. Expand risk assessment to understand mitigations from further up in the Supply Chain.

Assessing the Effectiveness of the Actions Taken

During the reporting period, Viridian has reviewed and finalised changes to policies to ensure they are best practice. Viridian have created KPIs to track the response rate to the self-assessment questionnaire, completion rates for modern slavery policy & training sign off and the number of identified modern slavery cases.

Viridian will continue to assess the effectiveness of its actions through:

1. Assessing the ability to remediate swiftly if an instance is found in supply chain
2. Investigate ways to assess risk by supplier, in the absence of self-assessment questionnaires being returned

Our Procurement team and CFO will continue to meet monthly to ensure this process is continually improving.

45%



Self-Assessments returned

100%



Completion rate for training and policy compliance

0



Identified modern slavery cases