

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Introduction

CCP VI VG Holdings Pty Ltd (ABN 630 151 530) “Holdings”, and its subsidiaries below, have registered offices at 8 Williamson Road, Ingleburn NSW 2565:

Viridian Glass Pty Limited (ABN: 68 006 904 052) “Viridian Glass.

The operational activities of Holdings and its subsidiaries are conducted through Viridian Glass. Viridian Glass is deemed a reporting Entity under section 5.1 of the *Modern Slavery Act 2018* (Cth) (the “Act”). Viridian Glass makes this statement under section 13 of the Act.

## Description of Viridian Glass’s Activities

Viridian Glass is a resident glass processor, distributing products across Australia. Viridian Glass employs approximately 460 people.

Viridian Glass (**Viridian** or **Company**) is committed to operating a sustainable and responsible organisation that is respectful to our employees, customers, the environment and wider community (**Stakeholders**). Critical to this is ensuring that our supply chains do not engage in practices that are contrary to these values. This includes a commitment to the abolition of modern slavery and human trafficking.

Modern Slavery can take many forms; it is a complex and multi-faceted problem. The *Modern Slavery Act 2018* (Cth) covers four key criminal activities:

- (a) Slavery: where ownership is exercised over an individual.
- (b) Servitude: involves the obligation to provide service imposed by coercion.
- (c) Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- (d) Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them.

Viridian believes in universal human rights, and modern slavery practices are contrary to this. Modern slavery is a crime and is repugnant to a person's freedoms and liberties, exploiting others for an individual(s) personal or commercial gain.

Viridian believes that as a responsible corporate citizen, it is our obligation to ensure that our company, and those connected to it including employees, customers and suppliers, share our zero-tolerance approach to modern slavery and our commitment to preventing it and human trafficking.

While subject to ongoing review and improvement, our statement outlines the actions and activities during the financial year 2019/2020 to ensure that we support this objective.

Trust and integrity are fundamental to ensuring a positive relationship with all stakeholders. This includes that our selection of suppliers and partners is undertaken with proper due-diligence that encompasses respect for all laws, and compliance with health, safety and environmental standards.

At this time, Viridian has not identified any instances of slavery or human trafficking within either of our operations or supply chain. If we do become aware, this will be reported to the relevant authorities. While much of what we procure is currently within Australia, we recognise that this may change in the future. As such, we are ensuring that we have a process that enables the rapid offboarding for any of our suppliers should we become aware of any violations.

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## The following are Viridian's core elements of our actions to prevent modern slavery and human trafficking

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### Policies

At Viridian, the following policies operate to assist in ensuring that we identify and prevent slavery and human trafficking:

**Modern Slavery Policy** – this confirms Viridian's commitment to identifying and preventing modern slavery in our supply chain. This policy aligns with the *Modern Slavery Act 2018* (Cth) and the United Kingdom Modern Slavery Act (MSA), and other relevant legislation.

**Whistleblowing Policy** – all employees, customer and suppliers are encouraged to report suspicions of modern slavery or human trafficking, safe from retaliation. We provide mechanisms for this to be done confidentially.

**Code of Conduct** – our Code of Conduct outlines our obligations to employees and theirs to Viridian, by confirming our expectations of behaviour when working with each other and representing the Company, with customers, suppliers and the broader community. We continually work to ensure that our conduct is of high standards.

**Workplace Safety Policies** – this is a suite of policies to ensure that employees and those coming on to our site are safe. This includes policies covering bullying, harassment and discrimination, as well as working safely.

## Supplier Due Diligence

Viridian conducts regular reviews of our contractors and suppliers. In addition, we have restructured our Operational Excellence structure, to ensure greater alignment and consistency, which we believe also assists us in ensuring that our supplier adhere to our policies and laws.

This includes conducting risk assessments of services, and ensuring that our suppliers confirm that they:

- do not use any forced, compulsory or slave labour;
- employees work voluntarily, including being free to leave work;
- contracts are provided to employees that provide for reasonable notice periods;
- employees are not required to pay monies to their employers, and that salaries are not withheld for any unlawful reason; and
- employees are not required to surrender their passports or work permits as a condition of their employment.
- Establishment of safe and clean working environment

## Awareness

Awareness is raised by ensuring that the Modern Slavery Policy is available to all employees for review. This policy makes clear our commitment against modern slavery, how concerns can be reported and explains what modern slavery is.

We are reviewing our intranet in the first half of 2021, to ensure that our policies are easily accessible to all employees. In addition, we are ensuring that computer kiosks are available at all sites for production employees who may not have access to work computers to ensure that they can also review company policies.

## Training

Viridian provides e-learning to all employees. In addition, all onboarding and compliance training is conducted via e-learning.

Viridian provides e-learning on modern slavery to employees, which includes explaining what modern slavery and human trafficking are; how to identify it; how to respond; how employees and other stakeholders can raise concerns or complaints; appropriate guidance to give to suppliers; the steps that Viridian will take if a supplier breaches their obligations; and confirmation that the employees commit to our policies and procedures with respect to stopping modern slavery and human trafficking.

## Supply Chain Risk Assessment

We conduct risk assessments of our supply chain by reviewing and measuring our risks using global data sets to identify:

- Geographic Risk;
- Product Risk; and
- Service Risk.

We are ensuring that we check each of our suppliers against global watchlist databases to identify any flags for illegal activity.

In addition, that all companies comply with laws, regulations in place with an importance on human rights and environmental consciousness

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## Measuring How We Are Performing

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Viridian has identified a set of key performance indicators and controls to combat modern slavery and human trafficking across our stakeholder groups. This includes:

- number of employees who have completed training;
- how many of our suppliers have instigated programmes to at least the same standard as ours; and
- completion of compliance questionnaire.

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## Authorisation

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This statement is made pursuant to the Act and constitutes Viridian Glass's Modern Slavery statement in respect of the 31 March 2020 financial year and is approved by the principal governing body of Viridian Glass Pty Limited, being its Board of Directors.



Signed: Richard Bailey  
Position: Chief Executive Officer