



MODERN SLAVERY STATEMENT YEM23

Viridian Glass entity overview

Viridian Glass Pty Ltd (ACN 006 904 052) (“Viridian”), and its subsidiaries that are listed below, have a registered office at Governor Phillip Tower, Level 29, 1 Farrer Place, Sydney NSW 2000, with head office at 8 Williamson Road Ingleburn NSW 2565

All subsidiaries include:

- Viridian Glazing Pty Ltd (ACN 104 391 040)
- Don Mathieson & Staff Glass Pty Ltd (ACN 006 332 556)
- Viridian Glass Investment Company Pty Ltd (ACN 064 555 924)
- Viridian Properties Limited (ACN 007 510 447)
- Viridian International Pty Limited (ACN 010 675 699)
- Vivid Glass, Windows and Doors Pty Ltd (ACN 633 369 990)
- Viridian Glass Operations Pty Limited (ACN 004 158 909)
- SA Independent Glass Pty Ltd (ACN 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. Viridian is deemed a Reporting Entity as per section 5.1 of the ‘Modern Slavery Act 2018 (Cth)’ (‘the Act’) and makes this statement under section 13 of the Act.

Description of Viridian’s activities

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, painting, 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 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. In addition, during YEM23 Viridian hired 8 employees based in Manilla (Philippines) performing financial and customer service data entry roles.

Supply chain structure: Viridian has a dedicated procurement function including the National Operational Excellence Manager, Procurement Manager and Purchasing Assistant. Glass represents 50% 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 costs,

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 of its 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) via the Australian supplier.
- Processing: Viridian 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.

Modern slavery definition and risk assessment

Definition

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

Risk of Modern Slavery Existing with 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 EBA's 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, 77% 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 assess 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 were not able to obtain evidence to reduce the risk rating. In the consumables supply chain, Europe and USA are considered regions of low risk and these represent the bulk of our purchases. China has a higher relative risk for Modern Slavery activities, this supply chain will have further investigation in the future, specific to the entities and what they are doing to manage Modern Slavery risks.

Table 1: Purchased goods by Country during 31 March 2023 financial year

MANUFACTURING INPUTS	Source	%	Risk
Glass	Australia	77%	Low risk
Glass	India	10%	Low risk
Glass	China	10%	High risk
Glass	Other	3%	For investigation
Consumables	Europe	73%	Low risk
Consumables	China	11%	High risk
Consumables	USA	8%	Low risk
Consumables	Korea	8%	High risk

Current and future actions

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. In order 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 **Whistleblower 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 2023 financial year:

1. Commenced a review of the policy framework to ensure it meets best practice in respect of Modern Slavery identification and mitigation. This was ongoing as at the end of the financial year, finalised in September 2023.
2. Where appropriate as informed by the risk assessment, Viridian engaged directly with new 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. Undertook annual Modern Slavery awareness and training by all relevant staff and implemented sign off to show compliance and understanding of the Modern Slavery Policy.
4. Conducted review of company strategy and values. The resulting values highlight our vision to create a level playing field for everyone in the business and who we deal with. This includes the importance of being open and honest, respecting each other and providing and maintaining a safe workplace.

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 2024, as follows:

1. Introduction of a Supplier Code of Conduct.
2. Continue the application of Anti-Slavery Questionnaire through existing supply chain, and undertake measurement and mitigation practices as required.

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 this policy.
4. Create KPI's to measure the effectiveness of our actions.
5. 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 made changes to policies to ensure they are best practice. The risk assessments have proved to be an effective tool to guide the business on which vendors are high risk, although we recognize there is more that can be assessed and done to improve our understanding of all risks within our Supply Chain.

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

- Creating KPI's to measure the effectiveness of our actions. This includes measuring the number of suppliers who have returned the self assessment questionnaire, completion rates for Modern Slavery Policy sign off & training, number of identified Modern Slavery cases.
- Assessing the ability to remediate swiftly in the event that an instance is found in supply chain.

Our Procurement team and CFO will meet on a regular basis to ensure we have a continual improvement approach to assess and monitor our risk assessment processes, identified Modern Slavery risks and mitigation efforts.

Consultation

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 2023 financial year and is approved by its board of directors.

If you would like to find out more about the above, please email viridian@viridianglass.com.



Neville Buch
Director, Viridian Glass Pty Ltd