



## **MODERN SLAVERY STATEMENT**

## Viridian Glass entity overview

Viridian Glass Pty Ltd (ACN 006 904 052), and its subsidiaries that are described 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 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 Glass's activities

### Structure and operations

Structure: Viridian is a privately held Australian company.

Operations: Viridian Glass is the largest glass processor of float glass and laminate products across Australia. We have operations 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). Included in our reporting structure are subsidiaries who do window fabricating and glazing.

Employees: Viridian Glass's processing operations vary by state, with some running 24 hours per day Monday to Friday, and others only 1 shift per day. We currently employ around 730 people in Australia including head office functions.

Supply chain structure: Viridian Glass has a dedicated procurement function including the National Operational Excellence manager and Procurement Category Manager. Glass makes up the majority of our purchases, which is predominantly through one supplier. The contracting for this supply is done through our CEO and includes activities on ensuring quality control and safe supply of products. For other consumables and costs, the procurement category manager performs activities such as identification and contracting for supply, quality assurance and audit where applicable.

## Supply chain

- Glass and consumables procurement: Viridian sources most of our glass from a local Australian Glass manufacturer. Some of the products we use are not manufactured in Australia and are sourced from overseas (see table 1 below for detail) through our Australian supplier.
- Processing: Viridian also sources consumables, for IGU's and custom laminates, energy for the toughening process and maintenance consumables for machinery. We also purchase aluminium for window and door fabrication.

## Modern slavery definition and risk assessment

### Definition

Modern slavery can take many forms; it is a complex and multi-faceted problem. The Modern Slavery Act (MSA) 2015 covers four key criminal activities:

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

Other forms of modern slavery, which will not be tolerated but are not specifically referenced in the MSA, include but are not limited to:

5. Child labour: whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

## Risk of modern slavery existing with operations and supply chain

### Employees

Tackling modern slavery requires colleagues to play a part and remain vigilant to the risk in all aspects of the Viridian business and business relationships.

We consider all Viridian’s 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.

### Processing inputs

The risks of modern slavery in the Tier 1 supply chain of glass products has overall been assessed as low. We have reviewed our main supplier of glass and their sourcing of products. Of the products we purchase, 82% are manufactured locally in facilities that comply with modern slavery reporting and with controls in place for their own operations. We consider this a low risk for modern slavery activities. The next largest sources of materials after Australia by volume are Europe and China. Europe is considered a region of low risk. China has a higher relative risk for modern slavery activities, this supply chain and others have been identified for further investigation in the future.

Table 1: Purchased goods by weight in 31 March 2022 financial year

MANUFACTURING INPUTS	Source	Weight %	Status
Glass	Australia	82%	Low risk
Glass	India	10%	Low risk
Glass	Other	8%	For investigation
Consumables	Europe	80%	Low risk
Consumables	Other	20%	For investigation

## 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 Anti-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 Anti-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.

All Executives are responsible for ensuring that their subsidiary complies with the provisions of the policy in the day to day performance of their roles.

### *Established suite of policies and procedures*

Through FY21 and FY22 Viridian has developed a suite of policies and procedures to measure and address risk of modern slavery in operations and supply chain, including

1. Establishing an '**Anti-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. Establishing an **Anti-Slavery Questionnaire** that includes a supplier questionnaire which is to assist suppliers to identify types of modern slavery related risk, collaborate with customers to address these risks, improve transparency across shared supply chains and identify areas for further due diligence. This is yet to be rolled out to suppliers.
4. Initiating a review of the **Code of Conduct**

### *Identified and enacted priority actions*

To underpin the commitments laid out in Viridian's Anti-Slavery Policy, Viridian has taken steps towards implementing the following measures through the course of the financial year 2021/2022:

1. Conducted risk assessments to determine which parts of the business and which supply chains are most at risk from modern slavery so efforts can be focused on the areas that are most 'at risk'.
2. Where appropriate as informed by the risk assessment, Viridian has engaged directly with new suppliers in respect of the Anti-Slavery Policy in order 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 modern slavery communication and employee awareness training, ensuring that relevant colleagues receive adequate training on the Anti-Slavery Policy and any supporting processes applicable to their role.

## **Future actions to continue to improve modern slavery risk management**

Viridian will continue to advance its Anti-Slavery initiatives through the financial year ending March 2023, as follows:

1. Review the current policy framework to ensure it meets best practice in respect of modern slavery identification and mitigation. This may include procurement document review, or the introduction of a Supplier Code of Conduct
2. Review the current governance, oversight and assurance processes to ensure they meet best practice
3. Begin the application of Anti-Slavery Questionnaire through existing supply chain, and undertake measurement and mitigation practices as required
4. 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.
5. Undertake annual modern slavery awareness and training measures to all relevant staff and ensure all staff are aware of related and supporting policies
6. Continue to engage with employees and suppliers to ensure they understand our expectations and assist them to build the necessary capabilities

## **Assessing the effectiveness of the actions taken**

During the reporting period, Viridian has reviewed its processes and made changes to make them more effective. For example, a modern slavery Policy is in place and a supplier self-assessment questionnaire was created. These changes will continue to be assessed to ensure that they are working effectively.

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

- regularly reviewing supplier compliance with Anti-Slavery Policy
- monitoring the number and range of suppliers who have been issued and have completed the assessment.
- assessing the ability to remediate swiftly in the event that an instance is found in supply chain

Our Human Resources/Procurement team will meet on a regular basis to continually assess and monitor our risk assessment processes, identified modern slavery risks and mitigation efforts.

The effectiveness of these actions will become more evident as we start implementing and measuring the outcomes of the actions identified in Section 3 in FY22 -23 and beyond.

Viridian will continue to work to prevent modern slavery and has a continual improvement approach to all business operations to ensure the processes and policies remaining current and compliant.

## 6 - Consultation:

The related entities all have members in common on the Board of Directors, 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's Modern Slavery Statement in respect of the 31 March 2022 financial year and is approved by its board of directors.



Signed: Neville Buch  
Position: Chairman, Viridian Glass Pty Ltd