



O'BRIEN®
MODERN SLAVERY STATEMENT
2021



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MESSAGE FROM THE CEO

Starting as a family business, O'Brien® has provided customers with solutions for their homes and cars for over 97 years. We've grown from humble beginnings to become one of Australia's most iconic companies and gained a reputation based on integrity and trust. It is important to us that what we do makes a difference and is meaningful for our customers, colleagues, communities we work in, and people involved in every step of our supply chain.

In the 1970s, O'Brien® became part of the Belron® Group, today the worldwide leader in vehicle glass repair and replacement, operating through wholly-owned businesses and a network of franchises in 38 countries across six continents. The Belron® global community has a shared purpose to Make a Difference by Solving Problems with Real Care. Our efforts in embedding respect for human rights across the globe and leading with our values is a key part of that purpose.

O'Brien® is committed to ethical procurement and business practices. As a result, we have developed systems and processes to proactively manage modern slavery risks and provide protection for workers within our own operations and supply chain. We have zero tolerance toward modern slavery practices.

This is O'Brien's second Modern Slavery Statement. As advocates for modern slavery reporting, we believe we all have an important role to play and that by supporting others, we become stronger ourselves. Our second Statement highlights our actions in embedding new policies, processes and modern slavery awareness training as part of our DNA and lays out the foundation for future modern slavery actions.

At O'Brien®, we believe we can accomplish more by working together and that it can be done, and we will do it. Together, we can make a real difference.

Peter Lumsdaine

CEO and Managing Director - O'Brien® Group

This Statement is made pursuant to section 13(1) of the Modern Slavery Act (Commonwealth) 2018. It constitutes the joint statement of the O'Brien® Group and covers the reporting period 1 January 2021 to 31 December 2021. This Statement has been reviewed and approved by the O'Brien® Board of Directors on 25 May 2022.



Peter Lumsdaine

CEO and Managing Director - O'Brien® Group

June 2021

About this Statement

Belron Australia Pty Limited and its related entities (collectively, **O'Brien**[®], or the **O'Brien**[®] Group) have prepared this Modern Slavery Statement (**Statement**) as a joint statement in compliance with the Modern Slavery Act 2018 (Cth) (**the Act**).

The reporting entity, Belron Australia Pty Limited, is a large proprietary company which is wholly owned by Belron International Limited (BIL), the world's leading vehicle glass repair and replacement company. BIL's major shareholder is D'Ieteren, a listed company on the Euronext in Brussels.

This Statement covers Belron Australia Pty Ltd (the Australian holding company in the O'Brien[®] Group) and all of its controlled entities as defined under the Act, being the following operating trading entities:

- O'Brien Group Services Pty Ltd ABN 74 132 161 285 ("**OGS**")
- O'Brien Glass Industries Limited ABN 74 000 022 275

All other entities within the O'Brien[®] corporate structure outlined in Figure 1 are non-trading entities, which do not enter into any employment contracts or supply contracts.

This is the second Statement for O'Brien[®] and covers the reporting period 1 January 2021 to 31 December 2021 (**Reporting Period**). This Statement meets the mandatory criteria structure as outlined in the Guidance for Reporting Entities: Commonwealth Modern Slavery Act 2018.

Consultation and Engagement

O'Brien® operates as an integrated Group of companies with policies, systems and approaches applied uniformly across each business unit and entity. The Executive Leadership Team is responsible for providing oversight and approval of the Group's sustainability strategy, including human rights and its annual Modern Slavery Statement.

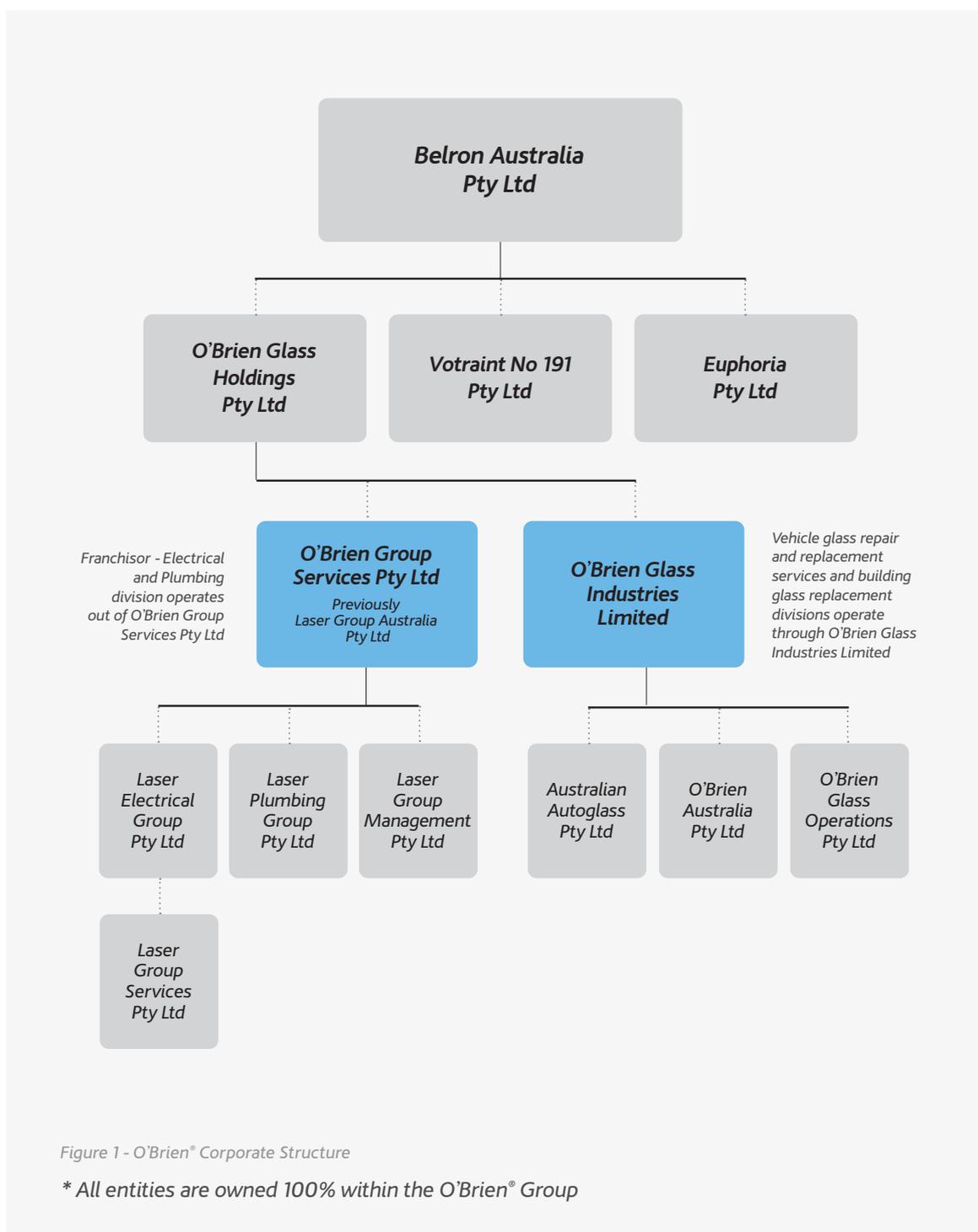
The modern slavery framework is then operationalised by each business unit, with the executive of each business unit ultimately responsible for managing human rights risks, and the outcomes are reported annually through the preparation and submission of a modern slavery statement, such as this Statement.

The Executive Leadership Team (consisting of the executives of each business team) endorse the final Modern Slavery Statement prior to its submission and approval by each board of the relevant company. Each of the three operating companies identified above has separately reviewed and endorsed this Modern Slavery Statement.

1. OUR STRUCTURE, OPERATIONS, AND SUPPLY CHAIN

1.1. Structure

Belron Australia Pty Limited operates through its subsidiaries O'Brien Glass Industries Limited and O'Brien Group Services Pty Ltd, the former providing vehicle and building glass repair and replacement services and the latter, electrical and plumbing services through its network of licensed electrical and plumbing franchisees.



1.2 Operations

O'Brien® operates across Australia with its head office in Padstow, New South Wales, Australia and an approximate annual revenue of \$283 million. The O'Brien® Group operates solely in Australia.

As of 31 December 2021, O'Brien® employs approximately 1,137 people and operates across 71 sites and locations. The majority of our employees are permanent, with 12.5% either fixed-term contractors or casual.

There are three distinct business divisions and service offerings:

- a) Automotive glass
- b) Glazing
- c) Electrical & Plumbing

These three divisions are supported by a centralised support team, including the operational division of property and shared services, and a customer care team with a 150-seat call centre located in Australia.



- **Automotive glass division:** repair, replacement of vehicle glass and associated recalibration services. This also includes the required operations to support the services, such as the importing of vehicle glass and ancillary products and distribution centres around Australia. The services are provided through our employees and approximately 80 subcontractors who are licensed to provide these services under the O'Brien® brand in regional Australia.
- **Glazing division:** the replacement of glass in homes and buildings and related quality assurance audits. This includes the required operations to support the services, such as the importing of glass and ancillary products. The services are provided through our employees and our network of over 400 non-branded glazing subcontractors.
- **Electrical & plumbing:** Our network of approximately 150 electrical and plumbing franchisee businesses provides electrical and plumbing services to Australian homes and businesses and employs over 1000 people.
- **Support services:** activities include the everyday operations of corporate offices and support for the three divisions, including a contact centre based in New South Wales with 150 seats, executive, HR, finance, IT, procurement, legal, sales, marketing, and central administration functions.

1.3 Supply Chain Network

In 2021, O'Brien® spent \$144 million across 40 procurement categories with over 4,000 suppliers. While the majority of the tier 1 suppliers are located in Australia, the largest spend is from suppliers in Asia.

Our suppliers are categorised into three groups:

Subcontractors	Australian suppliers that perform specific skilled jobs with an Australian workforce for the different O'Brien® divisions. They are usually smaller suppliers with short term contracts.
Suppliers shared with Belron®	Our largest suppliers of materials based on spend are usually located in China. They are shared with our parent company and are audited by Belron® and us.
Other suppliers	Australian and international suppliers. They are specific to O'Brien® with the majority of them being engaged on a long-term basis, with some one-off transactions.

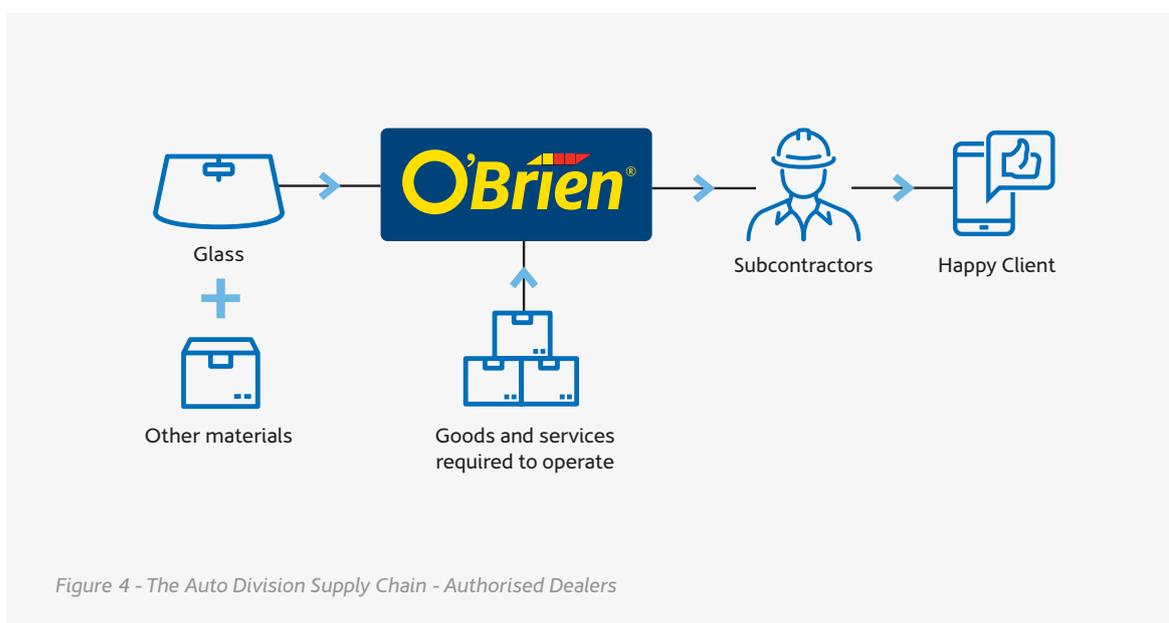
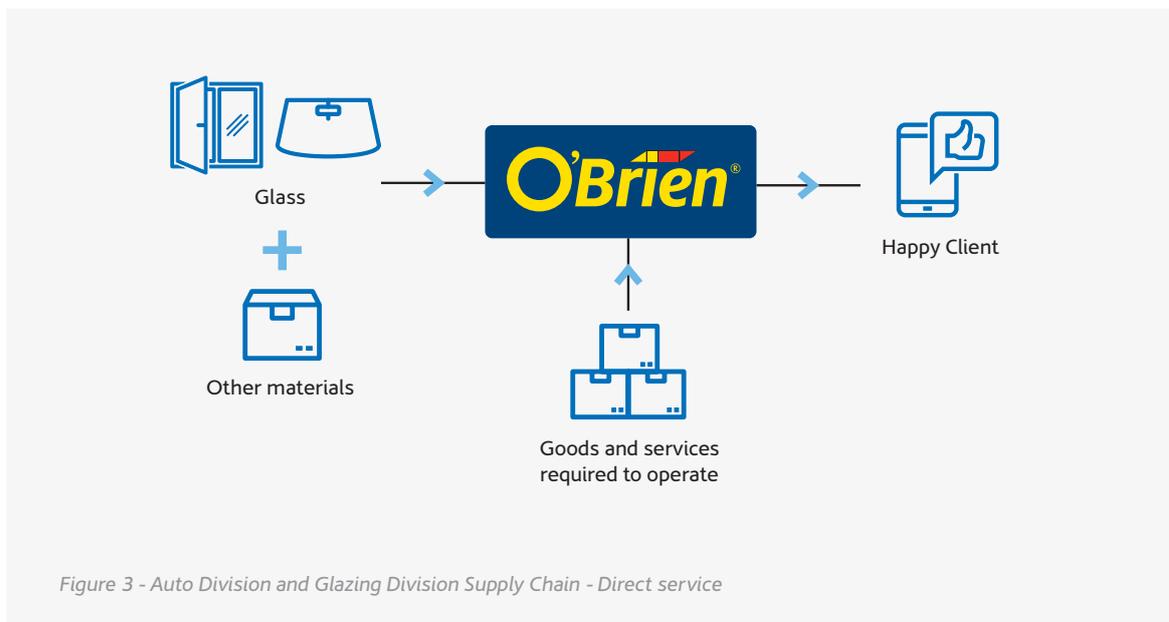
The majority of these suppliers fall into one of the following procurement categories:

- Automotive Direct Material
- Cleaning services
- Freight and shipping
- Glazing
- IT services
- Labour hire
- Maintenance
- Marketing materials and services
- Motor vehicles
- Authorised Dealers
- Office
- Original Equipment
- Plumbing and Electrical
- Professional services
- Property
- Tinting
- Utilities
- Vehicle repair
- Waste Management
- Travel and Entertainment

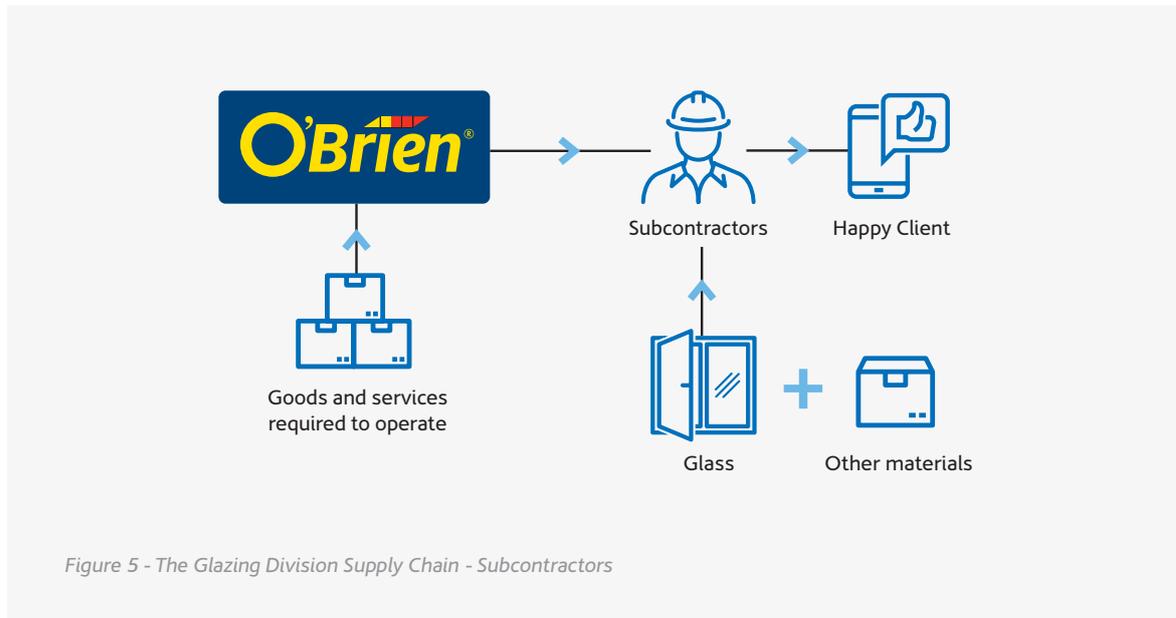
The O'Brien® supply chain can be divided into two core areas of direct business:

- Automotive glass division
- Glazing division

The largest proportion of business activity occurs within the Automotive glass division. Services are provided either directly (Figure 3) or via one of our Authorised Dealers (Figure 4). In this category, O'Brien® is in charge of the procurement of glass, and glass supplier management might be directly controlled or shared with our parent company Belron®.



Within the glazing division, we provide services directly through O'Brien® employees or through our subcontractors. The glazing division supply chain has the unique characteristic that both O'Brien® and subcontractors are responsible for procuring most of the key materials, including glass. Where O'Brien® procures the glass, it is usually from a local supplier or a distributor with an international supply chain. Where glass is procured by the subcontractors, O'Brien's visibility and control of procured products is reduced.



2. O'BRIEN[®] MODERN SLAVERY GOVERNANCE FRAMEWORK

We recognise that strong governance is essential for driving improvements, managing and mitigating the risks of modern slavery and human trafficking. Accordingly, O'Brien[®] has been building a governance framework year on year, reinforcing our commitment and strengthening our approach to modern slavery mitigation.

2.1 Accountability and Governance

Initially, O'Brien[®] appointed a modern slavery champion to lead the design and implementation of the company's modern slavery prevention, mitigation, and remediation efforts. The key role of the modern slavery champion was to raise awareness of modern slavery within the O'Brien[®] Group and coordinate the different business units to form a working group. The role of the modern slavery champion has now been subsumed by the Modern Slavery Working Group (**working group**), which consists of representatives from legal, HR, procurement and supply. The working group is responsible for promoting awareness of human rights and modern slavery risks across core business activities and implementing the O'Brien[®] modern slavery action roadmap.

The working group reports to an executive sub-committee, which is responsible for the Group's corporate governance and compliance framework and ensuring responsible, ethical and sustainable business practices, including in relation to human rights issues such as modern slavery. The working group reports to the executive subcommittee its progress against the O'Brien[®] modern slavery action roadmap as outlined in this Statement.

In the past 12 months, the working group has been involved in reviewing actions, processes and controls to address potential modern slavery risks, for example through the development of the supply chain assurance program.

2.2 Policies

O'Brien® has established a comprehensive suite of policies to support our modern slavery response.

Our policies clearly articulate the standards we expect from our people, suppliers, and partners to prevent and address modern slavery. These include:

O'Brien® Modern Slavery Policy

To communicate our commitment to the elimination of modern slavery, human trafficking, and all kinds of exploitation practices, we developed a new Modern Slavery Policy based on the UN Guiding Principles on Human Rights and the *Modern Slavery Act 2018 (Cth)*. The policy applies to all employees, contractors, and suppliers in Australia and overseas, including the workers in our extended supply chains and those who live in the communities we operate within. The policy is publicly available on our website.

O'Brien® Supply Chain Assurance Program

We take a proactive approach to identifying and managing modern slavery risk in our operations and supply chains through risk assessment and supplier due diligence.

Key actions within the framework include.

- Communicating the Supplier Code of Conduct and the Modern Slavery Policy to all new suppliers who must agree to the Supplier Code as part of the onboarding process.
- Assessing and establishing category risk profiles to inform our supplier prioritisation and risk allocation.
- Undertaking advanced risk assessment and due diligence of high risk suppliers to assess potential modern slavery risk.
- Engaging high risk suppliers with the modern slavery questionnaire or a site audit, as appropriate.
- Incorporating modern slavery expectations and minimum requirements into the supplier engagement and selection processes.
- Embedding modern slavery clauses into new and existing supplier contracts.
- Expanding our existing auditing program to high risk suppliers with an increased focus on modern slavery.
- Continuously engaging with identified high risk suppliers and critical suppliers to understand and continue to assess their performance and risk levels, actively encouraging improvement over time.

O'Brien® Supplier Code of Conduct

O'Brien® has a Supplier Code of Conduct that sets the minimum expectations for ethical behaviour from our suppliers and contractors for both new and existing suppliers. This includes a section on labour and human rights, specifically forced and compulsory labour, child and underage labour and freedom of association. New suppliers and subcontractors are required to read, understand and meet the standards of the Supplier Code of Conduct. Compliance with the Supplier Code of Conduct is a contract condition with provisions and consequences for non-compliance.

O'Brien® Modern Slavery Grievance and Remediation Framework

To support the current Whistleblower Policy and hotline, O'Brien® established a remediation process that outlines a straightforward course of action should modern slavery cases be identified or concerns are raised.

The key purpose of the remediation plan is to ensure that any victim of modern slavery is protected and to guide O'Brien® on the most appropriate pathway for supporting a victim to return to their personal circumstances before modern slavery. We at O'Brien® recognise that every case is unique and will tailor our approach accordingly.

This framework is a series of principles, tasks and anticipated or recommended actions. Key principles for remediation include:

- Victim centred
- Context specific
- Transparent
- Accessible
- Responsible
- Collaborative
- Action focused

O'Brien® Code of Conduct - “Our Way of Working”

One of the key areas for addressing modern slavery is training our employees and suppliers to increase awareness of modern slavery practices to enable recognition of potential signs of modern slavery. “Our Way of Working” was designed to help our employees make the best decisions guided by our ethical principles of integrity, respect, and trust. It includes scenario examples of difficult or uncertain decisions employees might face and recommendations on how to navigate them, as well as an Ethics Checklist they need to follow when making procurement decisions.

O'Brien® Whistleblower Policy

O'Brien® is committed to promoting and supporting a culture of ethical behaviour; we understand the importance of having a whistleblower service that is accessible, trusted, and anonymous to identify modern slavery and human rights issues and take appropriate action. Our Whistleblower Policy is available to internal and external stakeholders through the website and is promoted via posters located across our offices and branches. In addition, O'Brien® has a whistleblower hotline. This hotline is an independent and anonymous service to raise concerns about suspected modern slavery. The Whistleblower Policy and services are available to suppliers, contractors, and subcontractors and can be used as a grievance mechanism for modern slavery cases and reports.

2.3 Auditing

We, with support from Belron, have a long-standing external auditing program that assesses the compliance of our major glass suppliers with O'Brien® standards of ethical behaviour. This auditing program includes documentation review and a once-a-year site visit to supplier factories. This auditing program helps us detect if there are cases or concerns of modern slavery in our major suppliers and it is complemented by auditing done by our parent company Belron® which shares the results and the agreed corrective action plan with us. In 2021, 31 on-site audits were completed by Belron®, resulting in 251 corrective action points being agreed with suppliers.

2.4 Caring about our People

O'Brien® addresses the protection of labour standards and human rights of its employees through its work health and safety policies and frameworks. The vast majority of O'Brien® team members are employed directly, with their employment terms and conditions set out in employment contracts governed by Australian employment laws and relevant industrial instruments. 67% of team members are covered by collective employment agreements. O'Brien® recognises the right of team members to negotiate collectively, with or without the involvement of third parties. An estimated 6.68% of Australian team members are members of a registered trade union with whom O'Brien® regularly engages.

Remuneration for all employees is reviewed on an annual basis. We may utilise (where applicable) recruitment agencies to find candidates, but all the onboarding, salary and benefits discussion, contract management, and overall employment is done by O'Brien®. Where a licensing regime is in place, we utilise licensed labour-hire providers. These factors, combined with our comprehensive policies (set out above and communicated to our team members through training), regular monitoring, and grievance reporting mechanisms, mean that modern slavery risk in our direct operations is low.

2.5 Training and Awareness

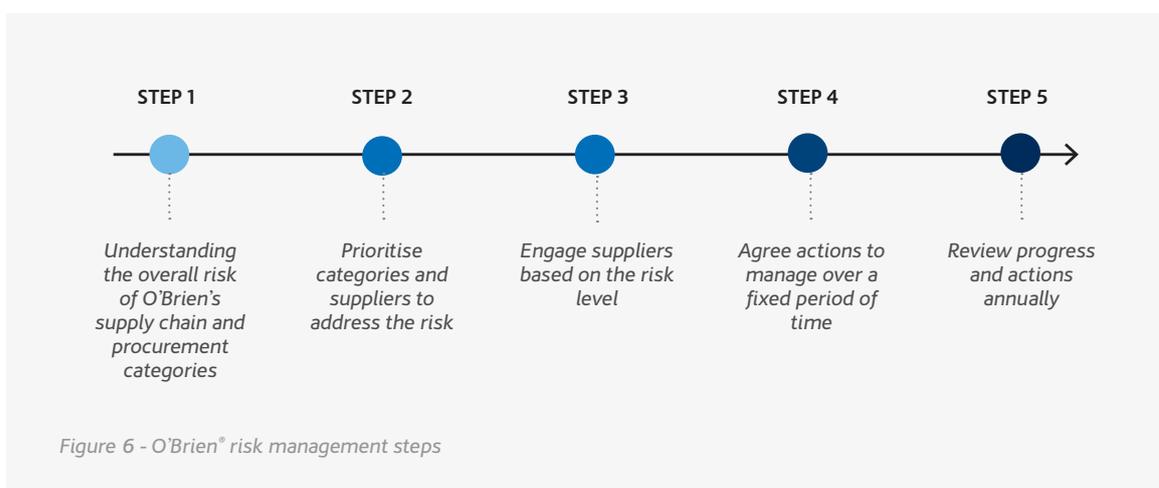
O'Brien® provides training through our Academy Online platform for key procurement employees, managers, and senior managers. This training emphasises our zero-tolerance approach towards modern slavery, and supports our employees identify and manage modern slavery risk. This includes improving awareness and accessibility to our whistleblower reporting channels and remediation process.

We have created a toolkit that includes communication sheets, webinars and newsletters that can be shared internally. These can be provided in the early stages of onboarding, following a risk screening assessment, or at any stage throughout the relationship.

3. OUR APPROACH TO RISK MANAGEMENT

O'Brien® proactively assesses and allocates risk at the category and supplier level to inform the steps and effort required to manage the modern slavery risk and to create a positive impact.

We have developed a due diligence framework with 5 risk management steps to prioritise our efforts - steps one and two were completed in 2021 and, step three shall form our focus for 2022.



3.1 Understanding the Overall Risk

In 2021, we engaged the sustainability consultancy Edge Environment to undertake a social risk assessment of our supply chain to identify the inherent modern slavery risks to the people within our supply chains according to the category of spend. The assessment analysed 40 procurement categories based on risk of child labour, forced labour, wage assessment, excessive working time, exploitation of migrant labour, freedom of association, gender equality, legal systems, and corruption. The level of risk per category is proportional to spend and to the inherent transaction risk of the relevant industry.

No global supply chain is free of modern slavery. The external risk assessment conducted by O'Brien® in 2020 identified the levels of latent risk of modern slavery identified in the table below. Based on our level of influence and control, O'Brien® has then determined whether we will be targeting suppliers in the initial round in accordance with the following:

CATEGORY	DESCRIPTION OF RISK	SUPPLY CHAIN LATENT RISK	O'BRIEN® LEVEL OF INFLUENCE	TARGETING IN INITIAL ROUND?
Automotive Direct Material	High risk materials such as: Glass, timber (pallets), aluminium, plastics.	High	High	Yes, they represent the biggest spend category for O'Brien®. The top suppliers in this category are shared with our parent, Belron® and will be targeted in the initial round.
Automotive – Authorised Dealers	Authorised dealers licensed to use the O'Brien® brand when providing vehicle glass replacement and repair services to its customers. Their supply chain includes high risk materials such as glass.	Low	High	Yes, O'Brien® has some control and high influence where the products are procured through O'Brien®. All authorised dealers will be targeted in the initial round.
Glazing – Materials	High risk materials such as: Glass, timber (pallets), aluminium, plastics.	High	Medium	Yes, it is a category that represents a high risk. The top 10 suppliers in this category will be targeted in the initial round.
Cleaning	Labour risk.	Very high	High	Yes, it is a category that represents a high risk and where O'Brien® has the ability to influence. There will be a RFP in this category in the initial round.
Office	Production of office products, such as food products, stationery and textiles, have a high risk of modern slavery.	High	Medium	Yes, it is a category that represents a high risk and where O'Brien® has influence. All uniforms, office supplies and stationery suppliers will be targeted in the initial round.
Auto - OE Materials	Supply chain risk for the materials purchased from original equipment dealers/manufacturers.	High	Low	Yes, it is a category that represents a high risk for O'Brien® due to the supply chain risk, however, there is little influence. The majority of suppliers in this category have their own modern slavery reporting obligations. Nonetheless, the top suppliers in this category will be targeted in the initial round.

CATEGORY	DESCRIPTION OF RISK	SUPPLY CHAIN LATENT RISK	O'BRIEN® LEVEL OF INFLUENCE	TARGETING IN INITIAL ROUND?
Construction Maintenance	Supply chain risk in building and repair materials and equipment as well as labour risk.	High	Low	No, construction and building services are undertaken on an ad-hoc basis. This will not be targeted in the initial round.
IT Services	Risk in offshore services and supply chain risk in electronic equipment.	High	Low	No, despite being high risk, O'Brien® has little control. The majority of suppliers engaged by O'Brien® in this category have their own modern slavery reporting obligations. This will not be targeted in the initial round.
Motor Vehicle	Supply chain risk in the production of vehicles and parts.	High	Low	No, despite being high risk, O'Brien® has little control. The suppliers in this category have their own modern slavery reporting obligations.
Travel and Entertainment	Labour risk in accommodation, hospitality, and food production.	High	Low	No, very low spend.
Tools	Supply chain risk in the production of tools.	High	Low	Yes, a moderate amount of spend for O'Brien®. All suppliers in this category will be targeted in the initial round.
Glazing and Electrical and Plumbing Sub-contractors	Labour risks.	Low	Low - Medium	Yes, subcontractors are very important for O'Brien®. The ability to influence is disparate – higher in the electrical and plumbing space and less so in glazing. The top glazing subcontractors will be targeted in the initial round.
Freight	Supply chain risk: overseas labour of transport	High	Low	No, very low influence.

3.2 *Prioritising categories and suppliers*

Utilising the modern slavery risk assessment and combined with O'Brien's current capacity to influence supplier performance (annual spend), we determined the risk level of each category and defined the engagement level required to achieve the highest impact.

We have designated a priority level for all our 40 categories, with 11 allocated as high priority categories. Supplier engagement for new suppliers is determined by priority level and is illustrated in figure 7.

RISK MITIGATION ACTION:	LOWER PRIORITY SUPPLIERS	AUTHORISED DEALERS	ELECTRICAL AND PLUMBING SUPPLIERS	HIGH PRIORITY SUPPLIERS	CLEANING SUPPLIERS*	BELRON® /OBG STRATEGIC SUPPLIERS
5. Audit scheme						
4. Offer Modern Slavery training						
3. Ask for documentation and certifications						
2. Complete supplier self assessment			 **			
1. Agree to modern slavery policy and supplier code of conduct						

* Applies to suppliers successful in RFP
 ** Applies to nominated suppliers

Figure 7 - Risk mitigation action based on the assigned modern slavery priority

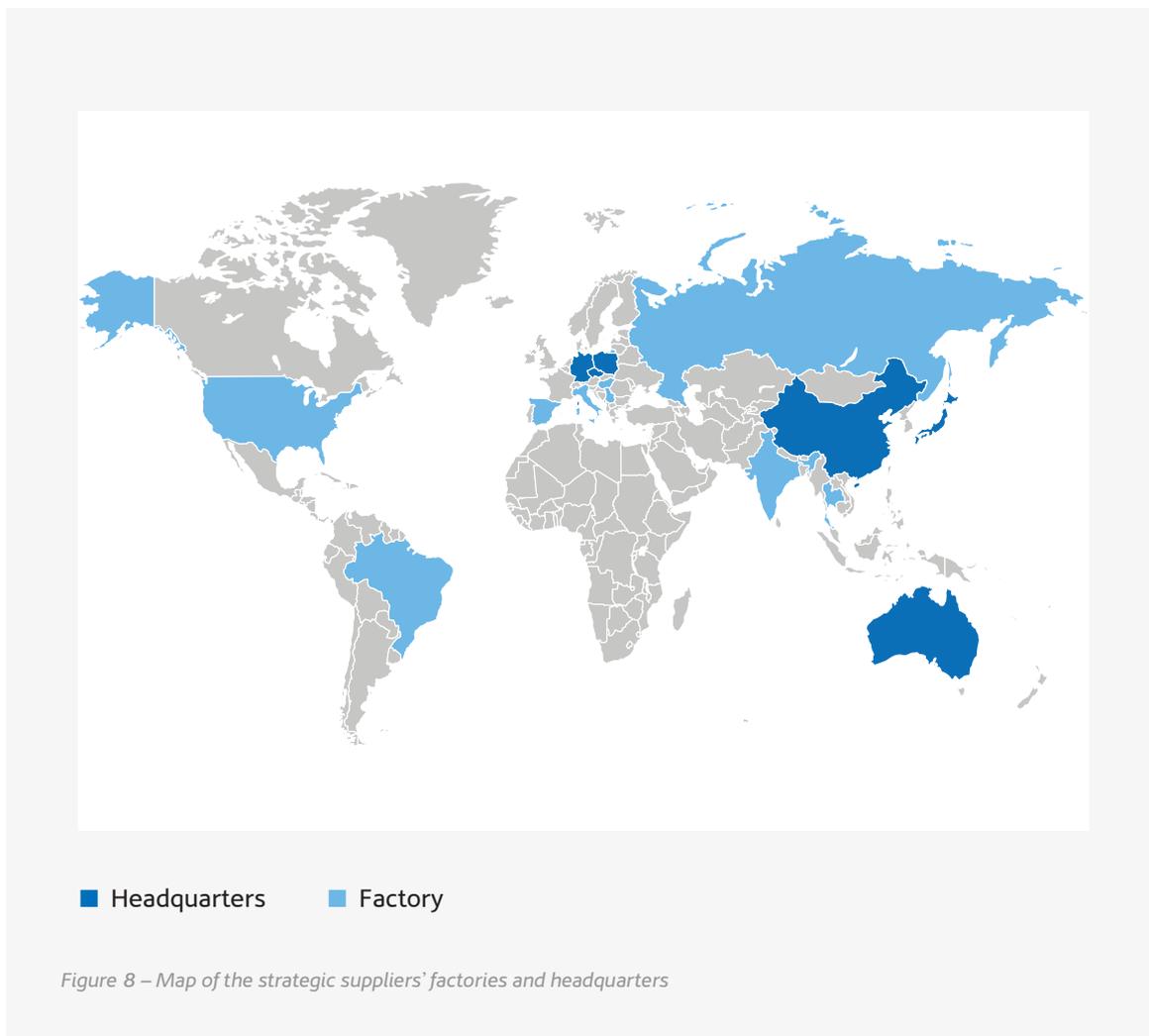
3.3 A risk-based approach

In order to have more clarity in the individual modern slavery risk each supplier represents, and find opportunities for collaboration and improvement, we have designed a modern slavery self-assessment questionnaire to be sent to suppliers in addition to the Supplier Code of Conduct and the O’Brien® Modern Slavery Policy.

O’Brien’s priority for 2022 is to complete the engagement of high priority and strategic suppliers and commencing the assessment of our own brand suppliers.

HIGH PRIORITY/STRATEGIC SUPPLIERS TO BE ENGAGED	PERCENTAGE OF O'BRIEN'S TOTAL SPEND THESE SUPPLIERS REPRESENT
69	34%
NUMBER OF OWN BRAND SUPPLIERS TO BE ENGAGED	PERCENTAGE OF O'BRIEN'S TOTAL SPEND THESE SUPPLIERS REPRESENT
All (93)	14%

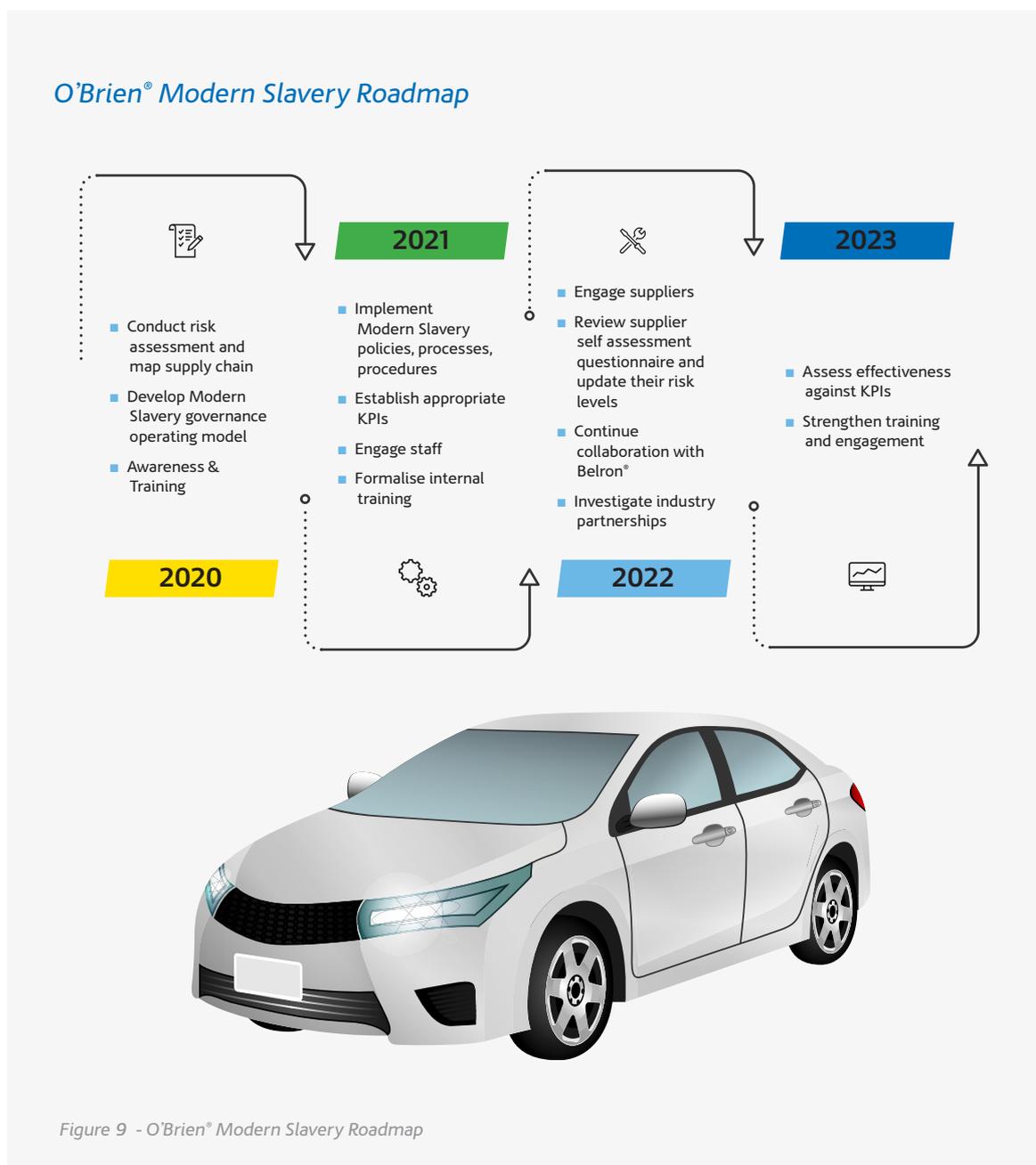
O'Brien®, with the support of Belron®, has already started engaging strategic suppliers, and we have begun an annual audit scheme of the factories supplying products to O'Brien®.



4. OUR MODERN SLAVERY ROADMAP

O'Brien® has developed a Modern Slavery Roadmap, which prioritises key actions to build our capacity to effectively identify, assess, and address the risks of modern slavery occurring in our direct operations and supply chain.

Each year, we continue to enhance and improve our governance operating model and our approach to collaborating with suppliers around risk assessment and due diligence while providing education, training and awareness opportunities for our people and suppliers.



5. 2021 ACTIONS AND PROGRESS

The focus of 2021 was to lay the foundation for our modern slavery framework. We created and implemented policies and processes and developed a roadmap to guide our future approach to modern slavery. We are looking forward to gaining deeper insights into potential risks and opportunities for improvement as we continue to engage our supply chain and implement the roadmap across 2022.

5.1 Enhancing Due Diligence Processes

One of our commitments is to strengthen and enhance our due diligence process when engaging suppliers and contractors. To achieve this commitment, we have been implementing the following key steps:

- Communicating the Supplier Code of Conduct and the Modern Slavery Policy to all new suppliers who must agree to the Supplier Code as part of the onboarding process.
- Creating tailored supplier assessments based on the size of the supplier.
- Developing a modern slavery questionnaire to roll out to high risk suppliers
- Developing minimum requirements to incorporate into supplier engagement and selection processes.
- Developing internal assurance of our procurement and contract management processes to better identify, assess and address the risks of modern slavery
- Collaborating with our global Belron® parent to expand our existing auditing program to identified high risk suppliers with an increased focus on modern slavery.

In 2022, O'Brien® is committing to continuously apply each of these actions as part of our Supply Chain Assurance Program and engage each supplier appropriately according to their risk rating. In addition, we will actively engage high risk suppliers and critical suppliers to build capacity and continuous improvement.

Case Study: Due Diligence in Action

A key difference between human rights due diligence and traditional business due diligence and risk management is that human rights due diligence focuses on risks to people rather than risks to the business. As part of our due diligence, we use targeted audits as a diagnostic tool to assess, measure and track the practices and performance of identified high risk and strategic suppliers against our Supplier Code of Conduct.

Whilst the term 'modern slavery' is used to describe serious exploitation and exists at the extreme end of a continuum, we recognise that practices like substandard working conditions or underpayment of workers are also illegal and harmful and when left unchecked may also escalate into modern slavery.

During one of our targeted supplier site audits during the 2021 reporting period, we identified unsafe and substandard working conditions that were inconsistent with local labour laws and our Supplier Code of Conduct. As a result, we worked together with our supplier to implement corrective actions. Our supplier, with our help and guidance improved the shift patterns and recruited additional employees to reduce the level of overtime. Additionally, a policy was adapted to ensure on time payment.

We are invested in fostering long term relationships and building the capacity of our suppliers to create shared vision for tackling modern slavery. We believe it's important to build our suppliers' understanding of our expectations, being behaviour and practices that align with our ethical values.

5.2 Collaborating with staff and suppliers

We continued providing modern slavery training to employees and developing systems to engage suppliers. Our key activities included:

- Developing a training plan for internal and external stakeholders
- Providing Modern Slavery training and targeting all employees with procurement roles
- Looking for opportunities to engage suppliers and developing systems to provide training for high risk suppliers and other stakeholders identified within our due diligence framework.

EXPECTATION	ACHIEVED PERFORMANCE
All members of the Executive Leadership Team to complete modern slavery awareness training	100%
All procurement department employees to have modern slavery awareness training	100%
Provide advance training to all procurement employees, so they have enough knowledge to explain modern slavery to suppliers	100%
All regional managers in Auto and Glazing divisions to complete modern slavery training	100%

5.3 Progress traffic light

We have continued to implement our toolkit to assess and address potential risks across our supply chain and enhance our safeguards and controls. Throughout 2022 we will continue to collaboratively assess risk with our suppliers and foster continuous improvement.

The following section outlines progress made since submitting the 2020 O'Brien® Modern Slavery Statement.

FOCUS AREA	ACTIONS	STATUS UPDATE
Training and Awareness	Develop a training plan for internal and external stakeholders	■
	Create modern slavery training and educational material for high risk suppliers	■
	Modern Slavery training targeting all employees with procurement roles	■
Communication	Communicate the Updated Supplier Code of Conduct, the Modern Slavery Policy, and the whistleblower policy which all went live on the O'Brien® website	■

FOCUS AREA	ACTIONS	STATUS UPDATE
Risk Assessment and Due Diligence	Update whistleblower policy	■
	Collaborate with parent company Belron® about the global supplier audit program	■
	Updated the Supplier Code of Conduct to include modern slavery and human rights provisions	■
	Develop a due diligence framework and process map to guide procurement in their assessment of suppliers.	■
	Develop a tailored modern slavery questionnaire that is based on the size of the supplier (no. of employees)	■
	Rolled out the supplier questionnaire to high risk suppliers	■
	Incorporate modern slavery expectations and minimum requirements into the supplier engagement and selection processes.	■
	Embed modern slavery clauses into new and existing supplier contracts.	■
	Expand our existing auditing program to high risk suppliers with increased focus on modern slavery.	■
	Continuously engage identified high risk suppliers and critical suppliers to understand and continue to assess their performance and risk levels, actively encouraging improvement over time.	■
Collaboration	Investigate potential industry partnerships to tackle modern slavery more efficiently	■
Monitoring and Evaluation	Develop key performance indicators to assess the effectiveness of modern slavery risk management and processes	■
	Modern Slavery Working Group to review the most appropriate method, scope and resources for assessing the effectiveness of our approach and processes related to modern slavery risks and report to the Executive Leadership Team	■

■ Goal achieved in 2021 - Complete ■ In Progress ■ Not Started

6. RESPONDING TO COVID-19

The global COVID-19 pandemic has continued to impact workers in our operations across Australia and our global supply chains. This includes increasing human rights related risks, including worsening vulnerabilities and other factors that may facilitate modern slavery.

During the 2022 reporting period, there were disruptions to certain O'Brien® operations due to COVID-19, including a transition of some of its workforce to remote working arrangements. The key considerations for O'Brien® included ensuring employee health and safety, providing flexibility, supporting employees in a remote working environment, and ensuring business continuity.

We have ensured our due diligence processes can adequately assess and address increased risks caused and worsened by the pandemic and have reviewed and re-screened existing suppliers where risk profiles may have potentially changed.

We will continue to prioritise suppliers with higher risks for additional due diligence and engagement, such as external information checks and self-assessment questionnaires as appropriate.

As part of our overall assessment of our response, we will review our governance mechanisms such as the Supplier Code of Conduct and grievance mechanisms on a continual basis to ensure effectiveness in the COVID-19 context. A crucial part of our approach always includes maintaining open communication with our suppliers and employees and making sure we provide training and practical guidance as appropriate.

7. 2022 PRIORITIES

O'Brien's main priority for 2022 is to start the engagement of suppliers and continue modern slavery training in order to continuously build employee engagement and awareness of modern slavery.

2022 KPI	EXPECTED PERFORMANCE
Provide modern slavery training to branch managers	All
Provide modern slavery training for selected suppliers	25 suppliers to be trained
Create an RFP for cleaning suppliers	All Cleaning suppliers to have a contract by the end of the FY22
Target and audit strategic suppliers	All
Send modern slavery toolkit to targeted suppliers as per Supply Chain Assurance program	All (69 suppliers)
Send self-assessment survey to targeted suppliers as per Supply Chain Assurance program	All (69 suppliers)
Send modern slavery toolkit to own brand suppliers	All (93 suppliers)
Receive and review supplier self-assessment questionnaire responses	80% of suppliers engaged (55 suppliers)
Give modern slavery toolkit to material new suppliers (being suppliers engaged through procurement team)	All
Report progress to the Executive Leadership Team	Modern Slavery Working Group to report progress on a monthly basis.

8. EFFECTIVE ASSESSMENT OF ACTIONS AND COMMITMENTS FOR 2022

We can measure the effectiveness of our modern slavery roadmap using three indicators. The first measurement of effectiveness is whether our actions can reduce the risk of modern slavery across our operations and supply chains. At O'Brien®, we have been reflecting on how to know if risk is reduced, and we concluded that it is too early to tell at this foundational stage. However, it is something we will have a better capacity to measure as we operationalise our due diligence systems and collaborate more closely with our identified 'at risk' suppliers.

The second measurement for effectiveness is in how good we are at detecting modern slavery cases and addressing them. To evaluate the efficacy in this area, O'Brien® will regularly communicate with Belron® to review the approach to supplier audits, and we will closely monitor our supplier's agreed action plans and progress.

The whistleblower policy is an important tool to detect modern slavery. Whilst we haven't received any modern slavery reports, we understand that modern slavery is present in every supply chain, and we need to review and monitor the program to ensure it remains accessible and effective.

The third way of measuring effectiveness is how well O'Brien® has raised internal awareness of modern slavery and made change internal changes to improve its purchasing decisions and culture. We want to ensure that our processes and policies are integrated into core business and are being followed across the whole organisation.

The Modern Slavery Working Group, the Executive Leadership Team and the Board will periodically review the progress of the modern slavery roadmap and the appropriateness of the modern slavery governance framework. Everyone at O'Brien® is committed to reducing the risk of modern slavery from our operations and supply chain and to identify and remediate any modern slavery cases that might be present in our supply chain. We will continue to find ways to raise awareness of modern slavery with our people and across our industry with the aim of eliminating modern slavery: we know that together we can make a difference.