



**O'BRIEN®**  
**MODERN SLAVERY STATEMENT**  
**2022**



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*O'Brien® acknowledges the traditional owners and custodians of country throughout Australia and acknowledges their continuing connection to land, water and community.  
We pay our respects to the people, the cultures and the elders past, present and emerging.*

# MESSAGE FROM OUR CEO

Dear Stakeholders,

As we reflect on the past year, I am filled with gratitude and pride for the incredible work and dedication our team have demonstrated. Our third annual disclosure statement addresses a topic deeply rooted in the O'Brien® DNA and holds great importance to all of us – how we can address the issue of modern slavery.

2022 was a year of refocusing. We realised that to make a real impact, we must narrow our focus and ensure that our actions truly matter. It became evident that it was a larger task that we imagined to engage with all of our varied types of suppliers with training materials that helped them understand and address the risks we wanted them to be cognisant of. Additionally, our Supplier Assessment Questionnaire was not providing us with the targeted information we needed to assess our suppliers effectively. However, these challenges served as valuable lessons from which we have learned and grown.

Looking ahead to 2023, we are committed to better engaging the market, aiming to empower our suppliers to fully comprehend and address the risks associated with modern slavery. We have listened and we are taking proactive steps to ensure our efforts align with their needs. Our goal is to provide them with the knowledge and resources they require to join us in our fight against modern slavery.

In the O'Brien® Group, our commitment to addressing modern slavery is deeply intertwined with our core values, expressed as the O'Brien® DNA of being caring, collaborative, driven and genuine. The case study of how we engage with our offshore BPO supplier, Acquire, clearly illustrates this and our care for the well-being of our people, no matter where they are located. Our organisation genuinely cares about our people, customers, business partners, the environment and the community we serve. Collaboration is at the heart of who we are. We believe that by working together and supporting one another, we can accomplish so much more. Our genuine approach, guided by integrity and respect, builds trust and sets the foundation for meaningful change. Our drive propels us forward. We are relentless in our pursuit of the extraordinary.

I am proud to share that while our progress in our modern slavery approaches has not been without challenges, our commitment to continuous improvement has not waned. While we acknowledge the challenges we faced, we also celebrate the milestones we achieved. Each step forward brings us closer to our vision of a world free from modern slavery. Together, we can make a difference.

As we move forward, I call upon our team to remain committed and driven in our efforts. Let us continue to learn, adapt, and refine our approach to combat modern slavery. By staying true to our values, we can create a lasting impact and inspire others to join us on this journey.

I want to express my heartfelt gratitude to all of you for your dedication and passion. Together, we are building a better future that upholds every individual's dignity and rights.

With warm regards,



**Peter Lumsdaine**

*CEO and Managing Director - O'Brien® Group*

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



**Peter Lumsdaine**

*CEO and Managing Director - O'Brien® Group*

# 1 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'leteren, 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, including the entities shown in the diagram, many of which are not operating entities. The main two operating entities are:

- O'Brien Glass Industries Limited ABN 74 000 022 275; and
- O'Brien Group Services Pty Ltd ABN 74 132 161 285

This statement covers the reporting period 1 January 2022 to 31 December 2022 (Reporting Period) and has been prepared to meet the mandatory criteria structure as outlined in the Guidance for Reporting Entities: Commonwealth Modern Slavery Act 2018.

## 1.1 *Overview of the O'Brien® Group*

### **About us**

O'Brien® has grown from humble beginnings to become one of Australia's most iconic companies. Next year the business will have been in continuous existence for 100 years serving Australians in glass and related industries.

With a history of excellent customer service and a desire to continually innovate and evolve, O'Brien® quickly grew and, in 1971, became part of the Belron® Group - the world's leading vehicle glass replacement and repair company, now operating in over 30 countries. Today O'Brien® is firmly the leader in automotive and home and business glass replacement and one of Australia's most trusted brand names. We pride ourselves on the quality of our employees, our workmanship and our commitment to providing first-class service to every customer.

### **Our Purpose**

- Making a difference with real care

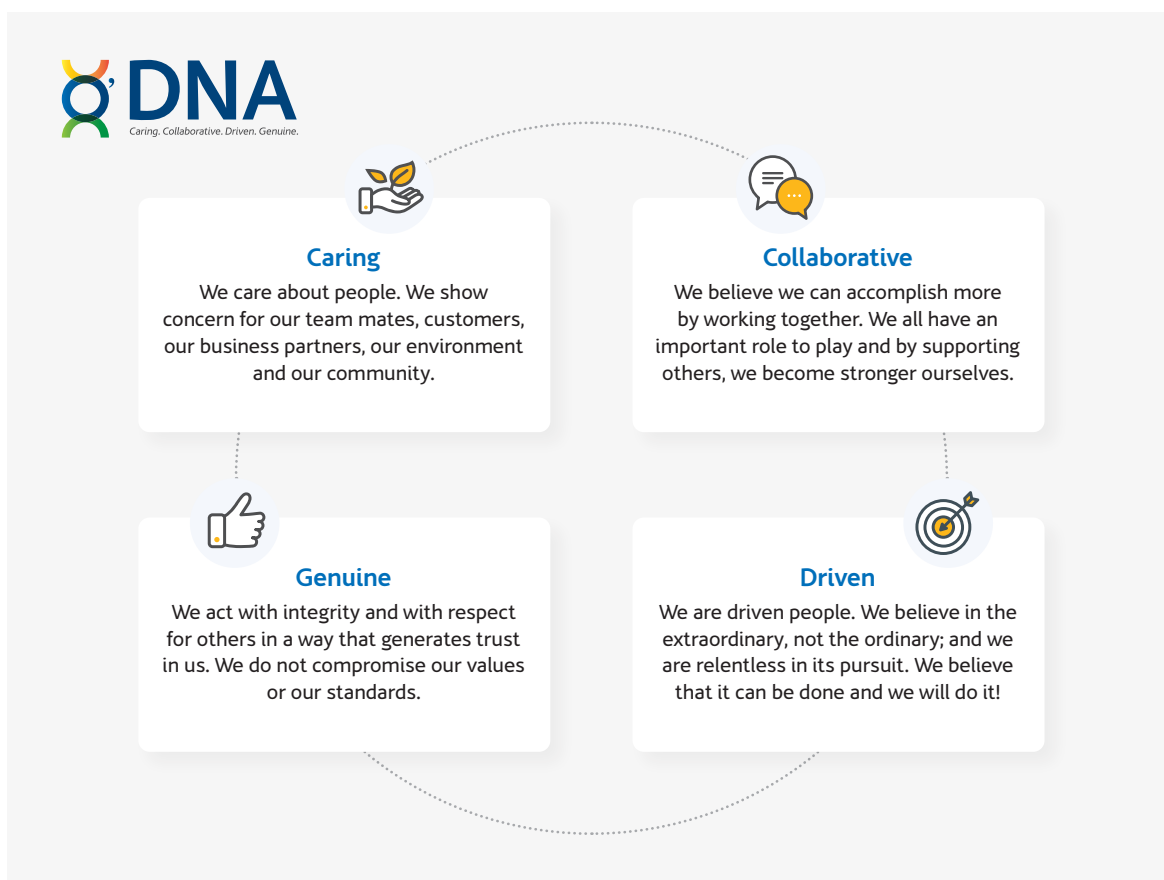
### **Our Vision**

- To become the number 1 services company in Australia for vehicles, homes, and buildings



## The O'Brien® DNA

We employ people who connect with and believe in our DNA.



## 1.2 Consultation and Engagement

The Board of Directors of the holding company Belron Australia Pty Ltd and O'Brien Glass Industries Limited have the same members, with the Directors of O'Brien Group Services Pty Ltd being a smaller Board with a subset of Directors of the holding company. The Board of Belron Australia Pty Ltd is responsible for overseeing and approving the Group's sustainability strategy, including human rights and its annual Modern Slavery Statement. The modern slavery framework is operationalised by the Executive Leadership Team who sits across all businesses within the O'Brien® Group.

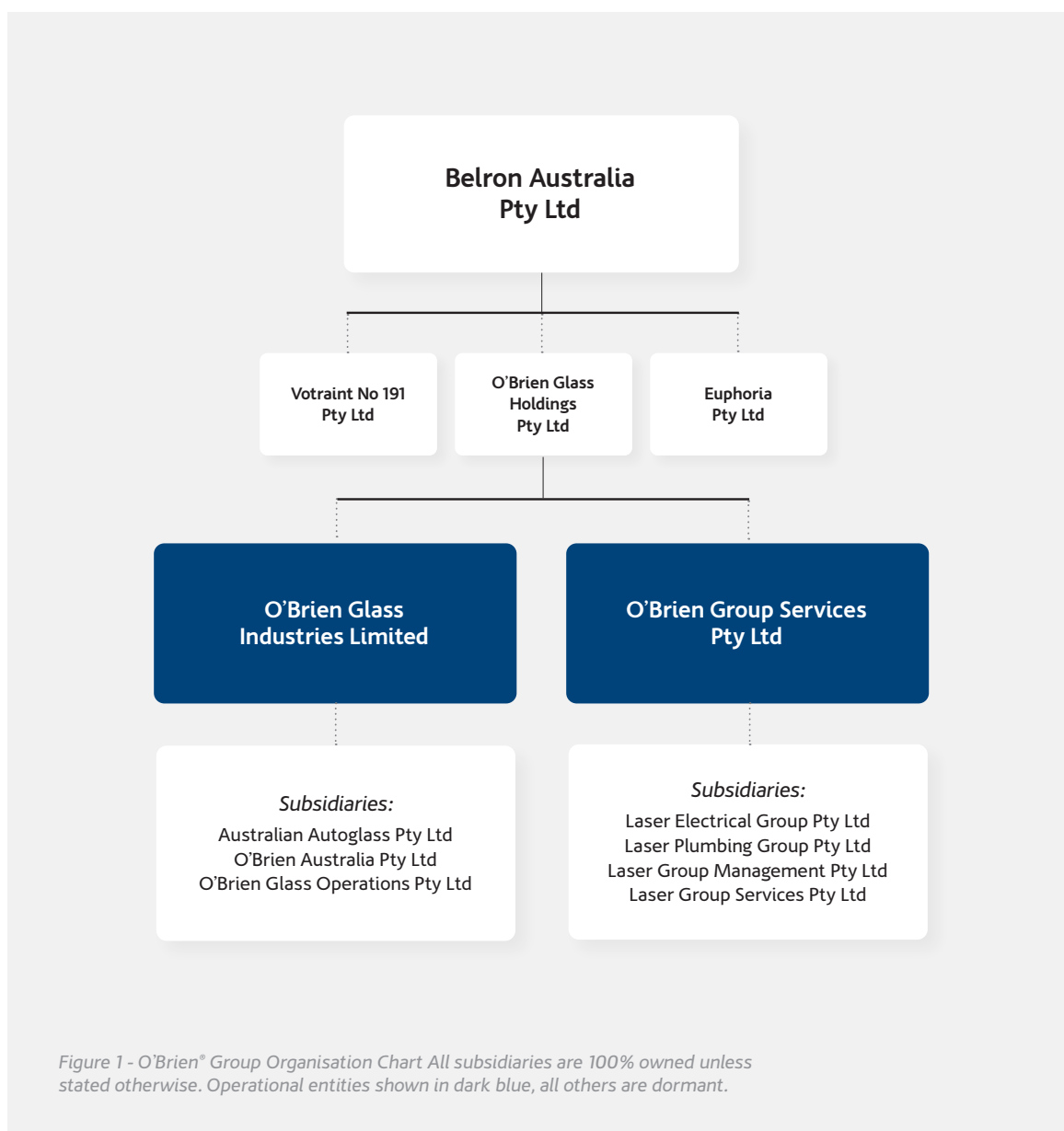
Our groupwide governance approach means business units are consulted regularly, with the Executive of each business unit (each of whom sits on the Executive Leadership Team) ultimately responsible for managing human rights risks in that business unit. All outcomes are reported annually in this Statement.

The Modern Slavery Working Group reports its findings to the Legal Director, who then reports the same to the Executive Leadership Team and CEO on a monthly basis. The Executive Leadership Team endorses the final Modern Slavery Statement prior to its submission and approval by the O'Brien® Board. The Executive Leadership Team has signed off on the preparation and approval of this Statement.

## 2 OUR STRUCTURE, OPERATIONS, AND SUPPLY CHAIN

### 2.1 Structure

Belron Australia Pty Limited operates through its subsidiaries within the O'Brien® Group: 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.



Belron Australia Pty Ltd operates exclusively in Australia, with its headquarters in Padstow, New South Wales. With an annual revenue of approximately \$341 million, our company plays a significant role in the Australian market. As of December 31, 2022, the O'Brien® Group employs around 1,117 people across 71 sites and locations. The majority of our workforce are permanent employees, while 7.7% are either fixed-term contractors or casual workers.

We are divided into three core pillars of Automotive Glass, Glazing, and Electrical & Plumbing, supported by a shared division encompassing our corporate support services.

**Support services:** activities include the everyday operations of corporate offices and support for the three divisions' executive, HR, finance, IT, procurement, legal, sales, marketing, and central administration functions. Some business support services are provided by a third-party provider (Acquire) which is based in the Philippines. We explain below how we actively engage in the Acquire business to ensure that modern slavery risks are identified, managed and mitigated.



#### Automotive Glass Division

Repair, replacement of vehicle glass and associated windscreen camera recalibration services. This division includes a contact centre based in New South Wales with approximately 150 seats. It also consists of the required operations to support the services, such as importing vehicle glass and ancillary products, and distribution centres around Australia. The services are provided through our employees and approximately 84 subcontractors who are licensed to provide these services under the O'Brien® brand in regional Australia as authorised dealers.



#### Glazing Division

Replacing glass in homes and buildings and related products like window film. O'Brien Glass also provides quality assurance audits. This division is now supported by a contact centre of 20, who work in a mix of sites from the metro branches and at home. This division also consists of the required operations to support the services, such as importing glass and ancillary products. These services are provided by our employees and our network, of over 354 non-branded glazing subcontractors, servicing around 99% of the post codes where Australians live.



#### Electrical & Plumbing

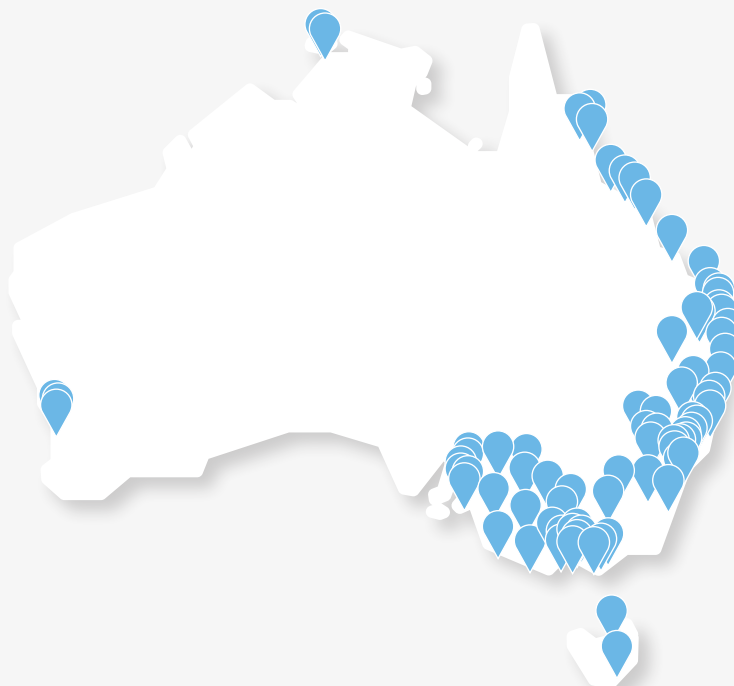
Our network of over 135 electrical and plumbing franchisee businesses provides essential electrical and plumbing services to Australian homes and businesses employing over 1,750 people. Their mobile service sees over 950 vehicles on the road delivering services in all States around Australia. Our division employs a small group of employees providing these businesses with operational, administrative, marketing and networking support services.



### AutoGlass, Authorised Dealers and Glazing Sites



### Electrical and Plumbing Sites

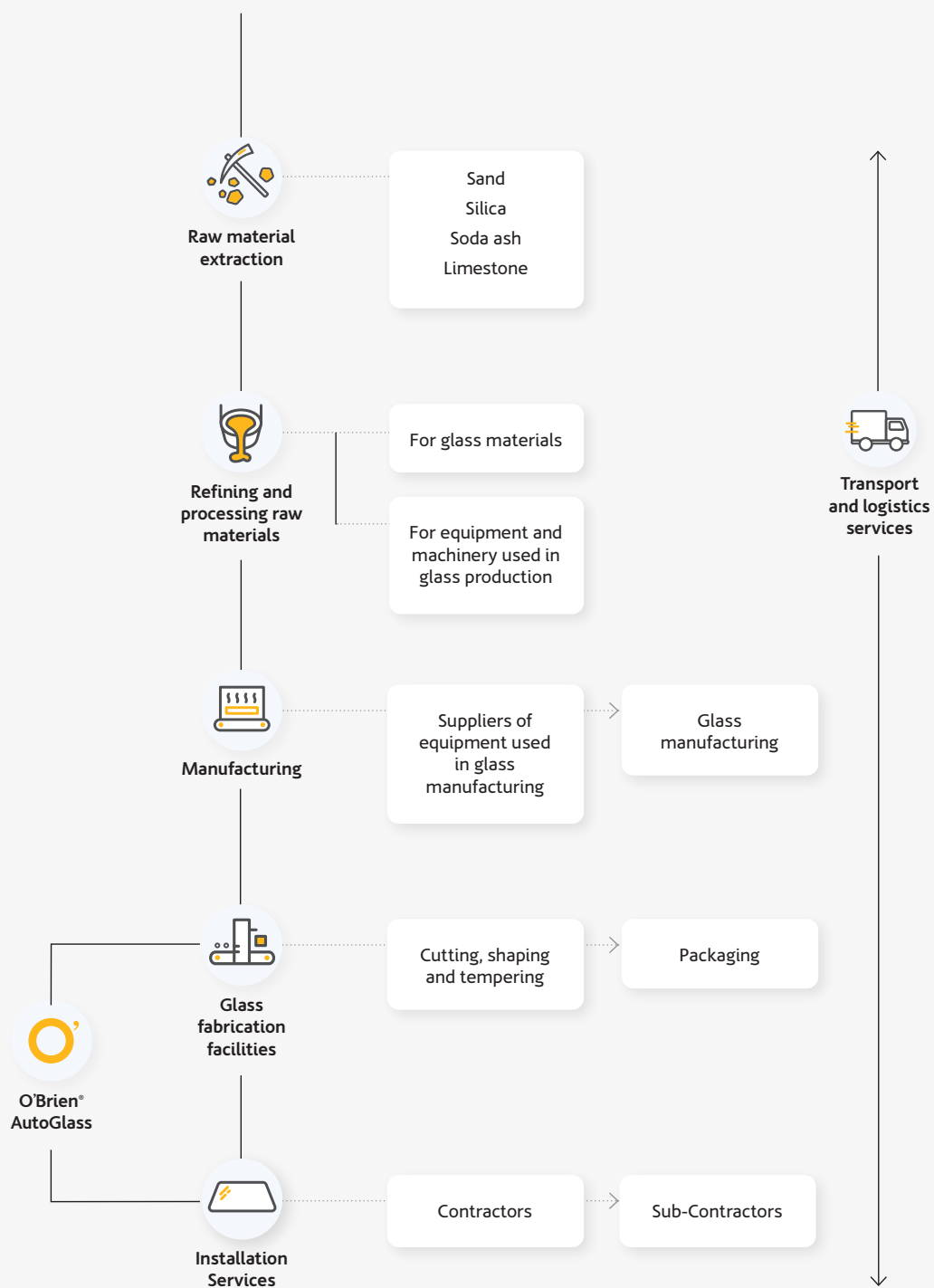


## 2.2 Supply Chain

In 2022, O'Brien® spent \$173 million across 40 procurement categories with over 2,000 suppliers. While the majority of the tier 1 suppliers are located in Australia, the largest spend is from suppliers in Asia for the Automotive glass division. In this category, O'Brien® is responsible for glass procurement, and the supplier management is directly controlled or shared with our parent company



## Automotive Glass



## Acquire Case Study: Provision of Business Process Outsourcing offshore

For approximately five years, a third-party has provided some business support services to the O'Brien® Group under a contract for Business Process Outsourcing (BPO). Since its inception, the O'Brien® Leadership Team has been cognisant of the potential risks of not just modern slavery but inequality in the treatment of its employees on Australian soil and those of the BPO project. Currently, 21 employees or "agents" in the Philippines are employed by a Philippines entity within the Acquire Group. (Acquire is an Australian entity that published its own Modern Slavery Statement 2022). These 21 agents are employed to work solely on the O'Brien® Group account. They provide various services in finance, IT, digital marketing, and contact centre administrative support.

BPO is a major industry in the Philippines, and the potential for modern slavery risks to arise is well known. The O'Brien® Group has taken proactive steps to ensure that these risks are minimised. The Executive Leadership Team considers this arrangement to be a partnership rather than simply a supplier arrangement and has actively engaged with the Acquire business in the Philippines to ensure that any people risks, including modern slavery risks, are identified, managed and mitigated. Actions taken to address these risks include the following:

- Every team member in the Philippines is assigned a manager within Australia with whom they have regular, if not daily contact to take instructions and submit work to. The team member in the Philippines will join team meetings using technology and interact with their Australian colleagues. These relationships build over time and are encouraged to be open and transparent with their Australian colleagues.
- A senior staff member, the O'Brien® Group's Credit Services Manager who is based in Australia, is actively engaged in the management of the O'Brien® Acquire agents. He endeavours to create a similar work environment to that of O'Brien® staff in Australia. He has regular meetings with different agents remotely every week and has regularly travelled to the Philippines to meet and engage with agents. While this was paused due to travel restrictions during the Covid-19 pandemic, he has visited the agents in Manila regularly (approximately 14 times over five years).
- During those visits, this O'Brien® Manager has confidential, one to one meetings with agents to discuss their concerns about employment related matters, such as performance reviews; pay increases; upskilling; and ensuring that additional support is provided when required.
- Agents are employed under local employment law in the Philippines. The full costs of all agent benefits under local employment law are paid by the O'Brien® Group. Some aspects of local employment law could be considered to be more flexible or generous than under Australian employment law, for example, slower and more employee-favourable performance management processes. The O'Brien® Group assists with these processes directly and not just through the contract with Acquire which requires compliance with these laws. We also observe the much higher number of public holidays in the Philippines, many of which are called at short notice, or accommodate agents who wish to take time off at penalty rates at other times.
- The O'Brien® Manager is also involved in interviewing agents before joining the O'Brien® campaign and debriefs management so that agents' concerns are addressed. As a result, the supplier has committed to corrective actions in the past. In addition, during the Covid-19 pandemic O'Brien® supported agents working on the O'Brien® campaign who could no longer meet our security needs to be seconded to other campaigns for fixed periods of time to ensure that they did not lose their jobs.
- As a result of our active engagement with agents working on the O'Brien® campaign, our campaign is well regarded by agents employed by Acquire and some have asked to be moved onto our campaign.

We consider that active engagement has mitigated modern slavery risks to date but we are always looking for opportunities for continuous improvement so are considering undertaking an audit during the next three-year Modern Slavery Roadmap.

This supplier partnership mindset which delivers much better experiences for both parties' employees, can serve as a model when considering services supply arrangements in categories with a high risk of association with modern slavery. This collaboration has allowed us to learn about the employment conditions and changes in the local environment which in turn has meant we have been able to adjust approach, terms, contracts and payments with a supplier.

## 3 APPROACH TO RISK MANAGEMENT

O'Brien® takes a proactive approach to modern slavery risk management by assessing and allocating risk at the category and supplier level to manage modern slavery risk and create a positive impact.

### 3.1 *Risk assessment*

To analyse the risks related to modern slavery in its operations and supply chain, O'Brien® engaged the sustainability consultancy Edge Environment in 2021. They assisted O'Brien® to conduct a social risk assessment of our supply chain, focusing on 40 procurement categories. The assessment evaluated risks such as child labour, forced labour, wage assessment, excessive working time, exploitation of migrant labour, freedom of association, gender equality, legal systems and corruption. Leveraging generic data sets, the level of risk for each category was determined based on spend and the inherent transaction risk of the industry.

### 3.2 *Prioritisation*

O'Brien® prioritised the outputs of the assessment to define priority risk areas by considering our level of influence and control, as well as the latent risk identified. The priority levels were determined based on the visibility O'Brien® has into the supply chain and our leverage with suppliers. Categories with high latent risk and high O'Brien® level of influence were designated as high priority, including vehicle glass, our Authorised Dealers (vehicle glass subcontractors), flat glass and local branch cleaning services. Other categories like office products, vehicle manufacturer supplied glass, and tools for our own use were also identified as risk areas but with varying levels of O'Brien® influence. Finally, we identified subcontractors in glazing as a category and offshored labour that we wished to include, given their importance to our business and mostly involved direct labour input. This prioritisation has helped us build consensus around the highest priority risks that we have the opportunity to build controls around, and where in our supply chains we should target our interventions.

### 3.3 *Findings*

Many of our highest risk products are procured via supply channels created and monitored by the Sustainable Procurement Team within our parent company, Belron®. Purchasing via this pathway allows us to leverage their influence to better control the risks to people inherent in these supply chains.

#### **Global sourcing**

The Belron® Sustainable Procurement Team has a programme with sophisticated processes for supplier management, part of which includes a bespoke social and environmental on-site audit.

For supplier due diligence, the programme conducts regular risk assessments to identify social and environmental risks, including modern slavery. These assessments are updated regularly to prioritise and schedule both remote and on-site audits. For on-site audits, a bespoke social and environmental audit programme aligned with the Belron® Supplier Code is used. This programme covers various areas, such as modern slavery, health and safety, environment, labour, and values. Furthermore, the programme involves direct dialogue with workers at production sites, which is conducted in local languages by independent audit providers.

Belron® collaborates with leading audit providers, such as TÜV and Elevate, to conduct on-site audits. The results of these audits, including any non-compliances, are communicated to Belron® for appropriate follow-up.

In 2022, audits were undertaken on 6 of 7 strategic global suppliers of O'Brien® by the Belron® Sustainable Procurement Team. These audits assessed issues such as working hours; health & safety; employee training, diversity, equity and inclusion and worker/management dialogue. The one supplier who we were unable to visit still underwent a formal review. None of the 7 reviews and audits raised any issues of modern slavery. However, for one supplier, health and safety issues were remediated. For this supplier, positive findings were reported around support and training for young workers, and employee benefits. Many positive findings were recorded for another supplier around employee training, diversity, equity and inclusion and worker/management dialogue.

### **O'Brien® Managed Procurement**

Locally, O'Brien® in Australia has for the past twelve months been seeking to leverage its supplier self-assessment questionnaire to assess local supplier approaches to modern slavery within our due diligence process. Although we sent out over 42 questionnaires to local suppliers, response rates were low (around 50%). We therefore supplemented our assessment through publicly available research.

Our analysis showed that the majority of key suppliers in the vehicle manufacturer category (supplying automotive glass and tooling) demonstrated awareness and compliance with modern slavery obligations. This assessment was based on a combination of responses received and publicly available documents, such as their own Modern Slavery Statements and other published policies.

However, the glazing, cleaning and office suppliers revealed a lower level of understanding and compliance with modern slavery as did glazing subcontractors. This highlighted the need for a more robust strategy for interpreting and utilising the questionnaire responses to inform the practical responses our staff should then be required to undertake (such as requesting clarifications).

As a result, O'Brien® Group has made the strategic decision to pause further follow-ups with suppliers on outstanding questionnaires until a comprehensive review of the existing questionnaire is conducted. The aim is to develop an associated assessment guide that provides clarity on the interpretation of responses and ensures a consistent approach to addressing latent modern slavery risks.



















In the upcoming Modern Slavery 2023-2025 Roadmap, O'Brien® Group will focus on reviewing supplier spend and checking that our priority risk areas haven't changed. Additionally, O'Brien® Group will prioritise follow-up actions for suppliers in the Glazing division who indicated gaps in awareness of modern slavery risks. The design of these interventions is yet to be agreed and forms part of our review.

By refining the supplier assessment process, developing a comprehensive strategy, and providing targeted support, O'Brien® Group is actively working towards a more robust and effective approach to managing modern slavery risks within its supply chain.

### 3.4 Category level risks

In our Modern Slavery 2023-2025 Roadmap, we will target the 6 higher risk categories shown in the table below where we believe that we have the ability to influence our suppliers. We will reassess the inherent risk for each category so that we can better understand the extent to which the O'Brien® Group and/or its suppliers potentially cause, contribute or are directly linked to the inherent risk of modern slavery in accordance with the United Nations' Guiding Principles on Business and Human Rights (UNGPs).

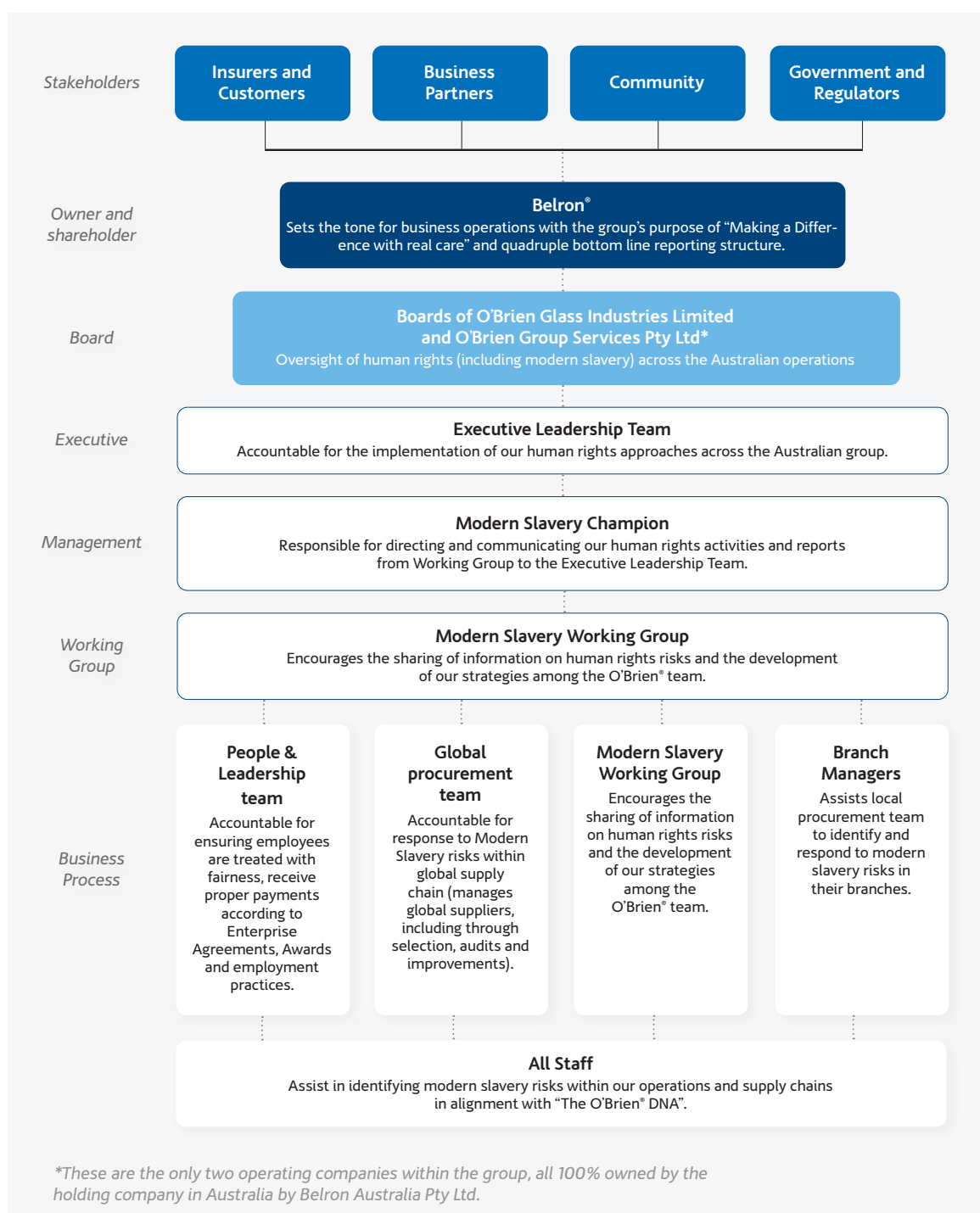
CATEGORY	LATENT RISK	O'BRIEN® LEVEL OF INFLUENCE	DESCRIPTION OF RISK
<b>Automotive Aftermarket Glass</b>	 High	 High	Our glass procurement supply chains, being the largest category of spend, present significant modern slavery risks. These risks involve the exploitation and mistreatment of individuals engaged in glass production, including forced labour, child labour, debt bondage, human trafficking, and hazardous working conditions. Factors such as raw material extraction, labour-intensive manufacturing, subcontracting, employment of migrant workers, and lack of transparency contribute to these risks. It is important to note that when our materials are sourced and supplied by our parent company (roughly 90% of our spend in this category), we have better leverage to monitor compliance with our requirements.  Our visibility into our supply chain and influence with suppliers in this category when we purchase direct is lower.
<b>Flat Glass sourced in Australia</b>	 High	 Low	Although sourced in Australia, this category has the same inherent risks as Automotive Aftermarket glass above given the manufacturing of glass in this category.
<b>Cleaning Services to Branches</b>	 Very High	 High	Labour-intensive services like cleaning pose a higher risk of exploitative practices due to reliance on a temporary and irregular workforce. The presence of migrant workers further increases the likelihood of debt bondage and visa exploitation. Use of indirect labour often through agencies by these suppliers reduces visibility and oversight over payment and contract terms. This lack of oversight extends to contracted labour for diversified service support, including cleaning.

CATEGORY	LATENT RISK	O'BRIEN® LEVEL OF INFLUENCE	DESCRIPTION OF RISK
<b>Automotive – Authorised Dealers</b>	 Low	 High	<p>Risks in this category come from two sources.</p> <p>Firstly, we have the same risks within our materials supply as for aftermarket glass as we supply this glass to our authorised dealers.</p> <p>Secondly, there is a risk of exploitation within the labour force. Within our authorised dealers, subcontracted labour carries modern slavery risks associated with potentially exploitative working conditions, wage underpayment, lack of employment protections, debt bondage, vulnerability of migrant workers and limited transparency and oversight of their employment conditions. While the latent risk is lower compared to other subcontracted labour arrangements due to the requirement for skilled technicians, our visibility into and oversight of these arrangements helps us control these risks.</p>
<b>Office Materials</b>	 High	 Low	<p>The procurement of office materials involves complex and multinational supply chains, making it challenging to gain visibility into the conditions faced by workers. Materials commonly procured for office use, such as food products, stationery, and textiles, pose high risks of complicity in modern slavery beyond our direct suppliers. These risks can arise during the extraction of raw materials, manufacturing, and processing, subcontracting and outsourcing, transportation and logistics, as well as packaging and distribution. Exploitative working conditions, forced labour, hazardous environments, and inadequate wages are among the dangers that workers may face.</p>
<b>Vehicle Glass Original Equipment (Branded Materials)</b>	 High	 Low	<p>The procurement of original equipment (branded products) carries specific risks related to modern slavery. The complexity of global supply chains and the pursuit of cost-effectiveness can increase the likelihood of labour exploitation and violations of workers' rights. Competitive market pressures may lead to subcontracting to less regulated entities, further exacerbating the risk. In this category, we acknowledge the increased challenges regarding supply chain visibility and have less leverage with our suppliers.</p>
<b>Tools for use</b>	 High	 Low	<p>The procurement of glazing tools poses risks of modern slavery throughout the supply chain. These risks include the extraction of raw materials, manufacturing processes, subcontracting arrangements, transportation, and distribution. Factors such as low-skilled labour, unregulated working conditions, lack of transparency, and subcontracting to unauthorised or unethical entities can increase the likelihood of modern slavery practices.</p>
<b>Glazing Sub- Contractors</b>	 Low	 Low - Medium	<p>Subcontracted labour in the glazing industry in Australia poses modern slavery risks, including exploitative working conditions, wage underpayment, lack of employment protections, debt bondage, vulnerability of migrant workers, and limited transparency and oversight of their employment conditions. While the latent risk is lower compared to other subcontracted labour arrangements due to the requirement for a skilled workforce, preventive measures and monitoring are still necessary to address these risks effectively.</p>

## 4 ADDRESSING AND MITIGATING RISKS







### 4.1 Organisational strategy

Our governance structure and policies serve as the foundation for our response to human rights risks, including modern slavery risks. They are designed to embed the core values and principles of the O'Brien® Group. These policies provide a clear framework for identifying and addressing modern slavery risks. They reflect our cultural understanding that managing these risks is a shared responsibility across our organisation, promoting a structured, consistent, and coordinated approach. Through this approach, we aim to effectively mitigate modern slavery risks and uphold our commitment to ethical practices.



## 4.2 Policies and Procedures

Relevant O'Brien® policies and other documents are publicly available on the Corporate Social Responsibility section of our website <https://www.obrien.com.au/corporate-social-responsibility/>. Together, and in conjunction with our due diligence framework, they set out our expectations of all O'Brien® team members and suppliers in relation to modern slavery.

DOCUMENT TITLE	OVERVIEW
 <p><b>Code of Conduct</b> - “Our Way of Working”</p>	<p>“Our Way of Working” is a comprehensive set of ethical guidelines and principles that govern the behaviour and actions of employees at O'Brien®. It sets clear expectations for conduct, emphasising integrity, honesty, respect, compliance with laws and regulations, confidentiality, avoidance of conflicts of interest, and responsible business practices. This resource equips employees with practical tools, including scenario examples and an Ethics Checklist, to make informed decisions guided by our core ethical principles of integrity, respect, and trust.</p>
 <p><b>Human Resources Policies</b></p>	<p>Our dedicated People and Leadership Team oversees our employment and workplace health and safety policies which include policies governing the employment relationships with our staff. These cover areas such as recruitment, performance management, grievance management, training and development, well-being health and safety, leave, benefits, flexible working, workplace giving and termination. Their purposes are to ensure fairness, compliance and a positive work environment.</p>
 <p><b>Modern Slavery Policy</b></p>	<p>Our Modern Slavery Policy aligns with the United Nations Guiding Principles on Business and Human Rights and the Modern Slavery Act 2018 (Cth). It applies to all team members, contractors, and suppliers in Australia and overseas, including the workers in our extended supply chains, and those that live in the communities we operate in. It sets out our commitment to the elimination of modern slavery, human trafficking, and all kinds of exploitation practices and expectations of our suppliers.</p>
 <p><b>Supplier Code of Conduct</b></p>	<p>Our Supplier Code of Conduct applies to all of our suppliers. It sets out the minimum standards of behaviour that the O'Brien® Group expects its suppliers (and suppliers in their own supply chain) to meet in the areas of labour and human rights, health and safety, environment, business integrity, privacy and supplier diversity. The Supplier Code of Conduct is provided to suppliers as part of our procurement processes and is incorporated into contracts. New suppliers must agree to the Supplier Code of Conduct as part of the onboarding process.</p>
 <p><b>Due Diligence Framework</b></p>	<p>The O'Brien® due diligence framework includes risk assessment, supplier engagement, audits and monitoring, contractual safeguards, training and awareness, remediation and grievance mechanisms, collaboration, and reporting for addressing modern slavery risks.</p>
 <p><b>Whistleblowing Policy</b></p>	<p>The O'Brien® Whistleblower Policy is designed to promote and support a culture of honest and ethical behaviour within the O'Brien® Group. It encourages employees to speak up about any potentially corrupt, illegal, or concerning conduct. The policy applies to all businesses within the group and covers various individuals, such as directors, employees, contractors, and suppliers. Stakeholders have the option to use this publicly accessible mechanism to report indicators of modern slavery risk.</p>

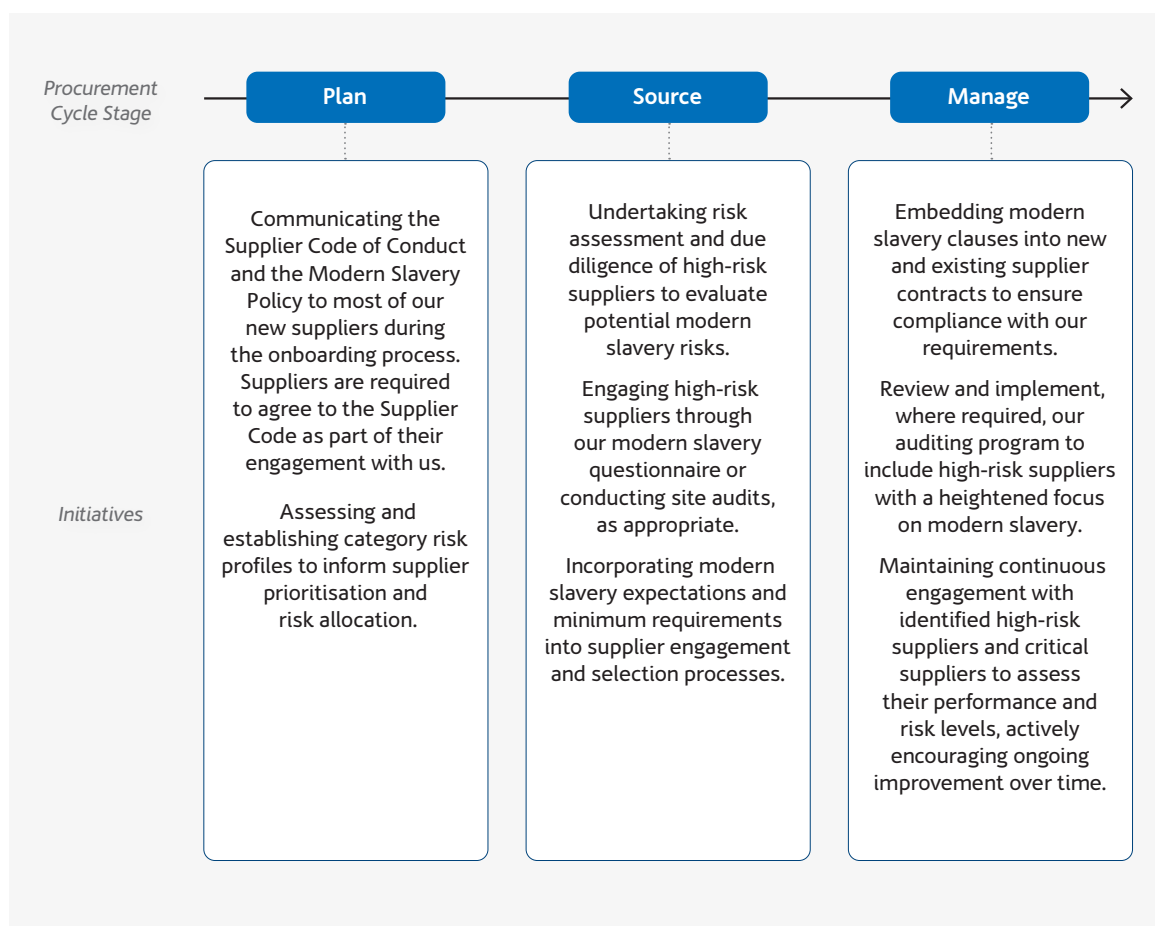
### 4.3 Capability and Awareness

Both staff and suppliers receive or are offered training on modern slavery. In 2022, O'Brien® provided training on modern slavery through an external Registered Training Organisation for executives and key procurement staff, managers, senior managers and branch managers. This training emphasises our zero-tolerance approach towards modern slavery and supports our staff to identify and manage modern slavery risks. This includes improving awareness and accessibility to our Whistle-blower reporting channels and remediation process. We have created a suite of materials that includes communication sheets, webinars and newsletters that can be shared internally. For suppliers we created training materials that can be provided in the early stages of onboarding, following a risk screening assessment, or any stage throughout the relationship.

### 4.4 Supply Chain Assurance Principles

O'Brien® adopts a proactive approach to ensure effective management of modern slavery risks within our operations and supply chains. This encompasses various activities that align with different stages of the procurement cycle - planning, sourcing, and management. These activities are designed to enhance our risk assessment and supplier due diligence processes, enabling us to identify and address modern slavery risks effectively.

An overview of the key activities is set out below, categorised according to their respective stages in the procurement cycle:



Through these interventions, we operationalise our commitment to promoting transparency, accountability, and responsible practices throughout our supply chains, mitigating the risks associated with modern slavery and ensuring a responsible and ethical procurement process.

## 4.5 *Grievance and remediation*

Our Whistleblower Policy and hotline are our primary system for grievances to be raised. In 2022 no modern slavery specific concerns were raised via our hotline. O'Brien® has a remediation process that provides clear guidelines for addressing instances of modern slavery and responding to concerns raised. The primary objective of this plan is to ensure the protection of potential victims of modern slavery and to guide O'Brien® in determining the most appropriate course of action to support their transition back to their pre-slavery circumstances. Given we have not yet needed to trial it we remain acutely aware that each case will be unique, and therefore, our approach will need to remain responsive to its complexities.

Our process is based on a set of important principles that guide what we do:

- We put the needs of the victims first and focus on their well-being.
- We consider the specific circumstances of each case to make sure our actions are appropriate.
- We are open and honest about what we're doing and keep everyone involved informed.
- We make sure that victims have easy access to the help and support they need.
- We take responsibility for what we do and follow ethical and legal rules.
- We work together with other organisations, like the police and support services, to make sure we do everything we can to help.
- We take action to solve the problems we find and make things better.

By following these principles, we want to create an environment where victims of modern slavery get the support they need, and everyone in our organisation understands their responsibility to make things right.



## 5 MEASURING EFFECTIVENESS

### Last year's commitments and performance

2022 KPI	EXPECTED PERFORMANCE	ACTUAL PERFORMANCE
Provide modern slavery training to branch managers, execs and others	All	96 of 96 completed.
Provide modern slavery training for selected suppliers	25 suppliers to be trained	Training materials shared with 14 suppliers. Feedback on the utility of the training will be sought before sharing further.
Create an RFP for cleaning suppliers	All Cleaning suppliers to have a contract by the end of the FY22	The RFP was deferred to 2023 for operational reasons. At the end of 2022, Modern Slavery surveys were sent out to potential participants as a pre-requisite to participating in the RFP.
Target and audit strategic suppliers	All	All 7 key strategic suppliers were targeted in 2022 with the help of our Belron® parent company Sustainable Procurement Team.
Send modern slavery toolkit to targeted suppliers as per Supply Chain Assurance program	All	Most local suppliers already had our Supplier Code of Conduct or it is part of their contract. During the year we assessed local suppliers through surveys, research and a review of survey responses. Questionnaires were sent to 60% of high-risk suppliers. 50% responses were received and further actions are under review.
Send self-assessment survey to targeted suppliers as per Supply Chain Assurance program	All	
Send modern slavery toolkit to own brand suppliers (Authorised Dealers)	All	100%. We have sent the modern slavery awareness training prepared by O'Brien® to all current Authorised Dealers. Note there are 84 dealers now.
Receive and review supplier self-assessment questionnaire responses	80% of suppliers engaged (55 suppliers)	60% engaged with a 50% response rate. Further actions will take place in 2023 to assess the appropriateness of the questionnaire.
Give toolkit (Supplier Code of Conduct and modern slavery training materials) to new suppliers, being suppliers engaged through procurement team	All	Ongoing management by our procurement team. Our Supplier Code of Conduct is available on our website and included in contracts where possible.
Report progress to the Executive Leadership team	Modern Slavery working group should report progress on a monthly basis.	Modern Slavery is a standing agenda item of the Executive team's monthly performance review.

## 6 NEXT STEPS

### 6.1 Future Commitments

AREA	COMMITMENT	SUCCESS CRITERIA
<b>Governance</b>	Modern Slavery Working Group will continue to meet regularly.	Modern Slavery Working Group will hold at least four meetings in the current reporting year with outcomes reported to the Executive Leadership Team.
<b>Policies, systems, and controls</b>	Undertake a review of the O'Brien® current governance, including procurement, policies, and practices against best practice frameworks.	Gap and Opportunity report reviewed by the Executive Leadership Team. Develop policies and processes as required.
<b>Develop an implementation roadmap</b>	Utilise the outcomes of the previous steps to co-create a clear implementation roadmap (inclusive of responsibilities and timelines) to build organisational capacity through a staged and targeted approach.	Implementation Roadmap reviewed by the Executive Leadership Team and socialised with required staff.
<b>Capacity building (maintenance)</b>	Required staff for the Modern Slavery training are clearly defined. Ensure all new staff have our Modern Slavery training included as part of their onboarding process. Engage with Authorised Dealers through O'Brien® Dealer conference.	100% completion by all O'Brien® staff in management and procurement roles have completed the Modern Slavery training within six months of their start date.  Workshop or training session for Authorised Dealers provided by O'Brien®.
<b>Capacity building (growth)</b>	Engage our purchasing staff in a workshop on ethical sourcing practices to identify opportunities and barriers in our existing approaches.	Completion of one workshop with our purchasing staff with outcomes reported through to the Executive Leadership Team.
<b>Due Diligence</b>	Develop an automated Supplier Assessment Questionnaire tool for new suppliers to assess and screen supplier's modern slavery risks and inform actions.	Excel based tool is developed to assist staff with evaluation of returned Self-Assessment Questionnaires. This tool has been signed off by the Modern Slavery Champion.
<b>Supplier Engagement</b>	Continue dialogue and reporting with members of the Belron® Group who support management and monitoring of key suppliers.	Modern Slavery Champion meets with responsible staff in the Belron® Sustainable Procurement Team who support management and monitoring of key suppliers on a quarterly basis with summary insights shared back to the Executive Leadership Team.
<b>Collaboration with industry partnerships</b>	The Glazing division will initiate engagement with Australian Glass and Windows Association (AGWA).  The Automotive division will initiate engagement with the Automotive Glass Association (AGA).	AGWA to provide at least one awareness information or training session to the building glass glazing industry.