



**O'BRIEN® GROUP**  
**MODERN SLAVERY STATEMENT**  
**2023**





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O'Brien® acknowledges the traditional owners and custodians of country throughout Australia and acknowledge 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 continue to be filled with admiration of and gratitude for the ongoing dedication and inspiring work of our O'Brien® team. Our fourth annual report addresses a topic deeply rooted in the O'Brien® DNA and holds great importance to all of us – how we can address the serious exploitation of people as encompassed by modern slavery.

In 2023, we underwent a rigorous review of our processes for addressing and mitigating modern slavery risks in our supply chain. This extensive review and consultation process resulted in the development of a new three-year Implementation Roadmap for 2024-2026.

Looking ahead to 2024, we are committed to implementing the steps outlined in the first year of our Roadmap, specifically embedding modern slavery principles through a coherent strategy of executive endorsement and socialisation, refining our policies impacting all areas of Modern Slavery, establish clear governance responsibilities throughout O'Brien® and communicating the impact of our Roadmap by sharing knowledge both within O'Brien® and with our external champions such as Belron and finally for 2024 maintaining rigorous KPI and risk assessment reporting.

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 foundational work undertaken in developing our

Roadmap for the next three years sets out a clear strategy to continuous improvement in addressing modern slavery.

Our team remains committed and driven in our efforts. We continue to learn, adapt, and refine our approach to combat modern slavery underpinned by staying true to our values.

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 (Commonwealth) 2018. It constitutes the joint statement of the O'Brien® Group and covers the reporting period 1 January 2023 to 31 December 2023. 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 (O'Brien®, or the O'Brien® Group) has 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 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 2023 to 31 December 2023 (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. In 2024, the business will celebrate its 100-year anniversary 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**

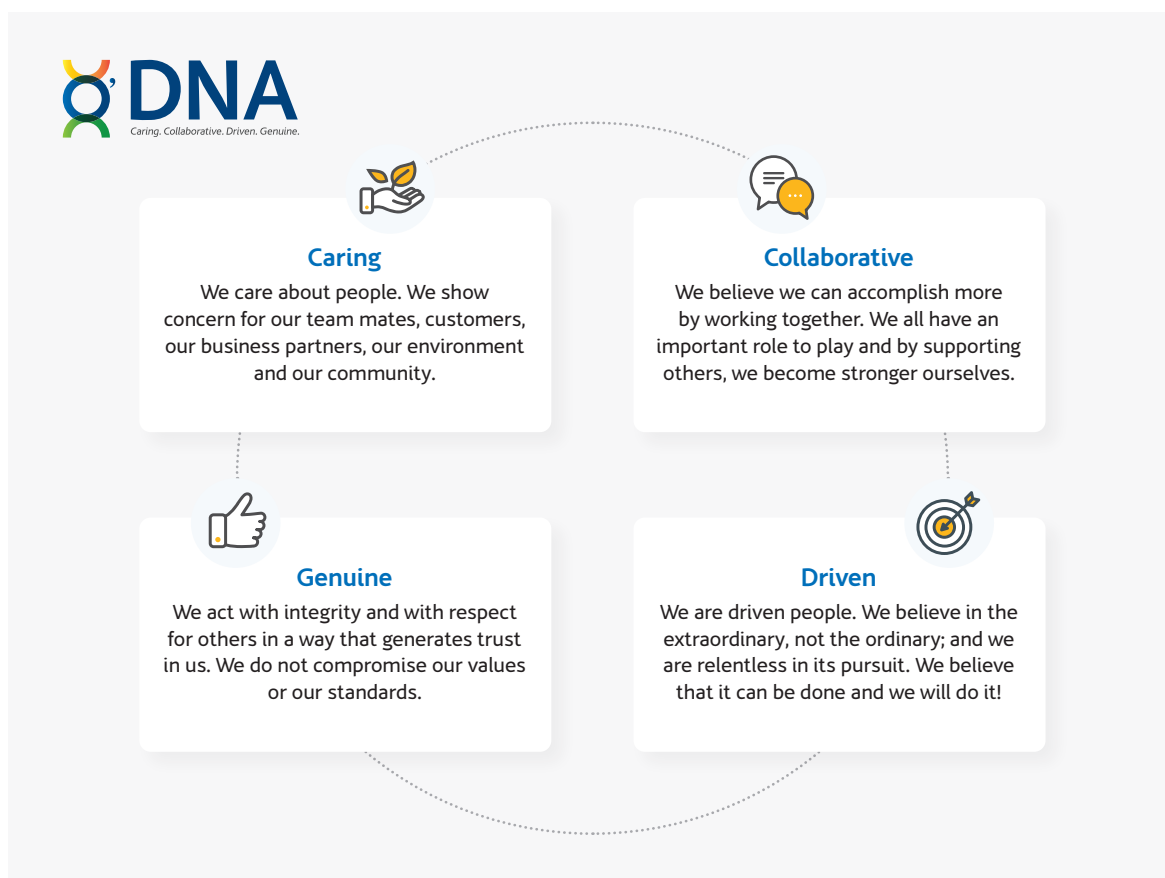
- Making a difference with real care

### **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 of 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.

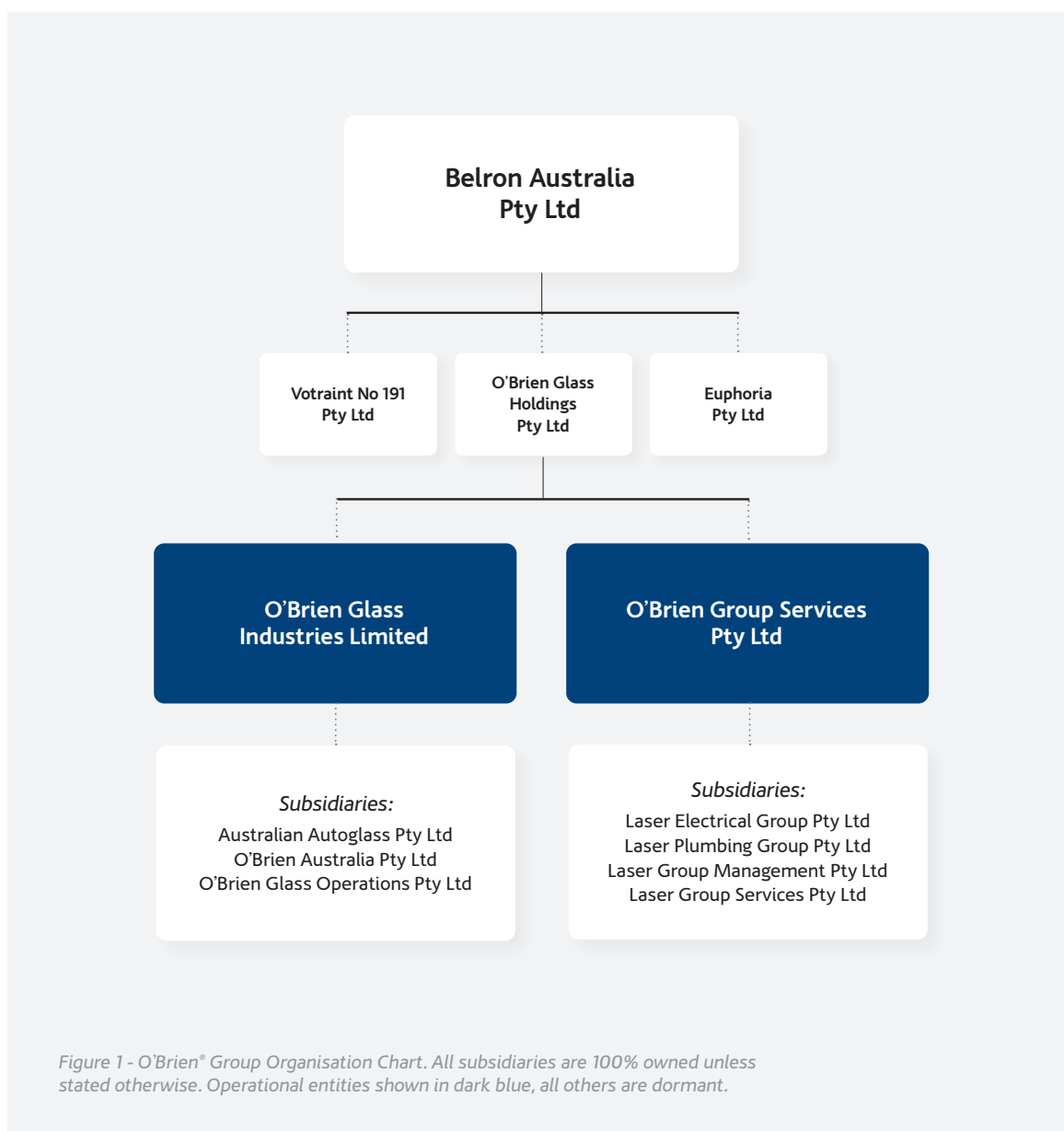
Our groupwide governance approach means business units are consulted regularly, with the Executive of each business unit (each of whom sits on the Executive Leadership Team) ultimately responsible for managing human rights risks in that Business unit. All outcomes are reported annually in this Statement.

The Modern Slavery Working Group reports its findings to the Legal Director, who then reports the same to the Executive Leadership Team and CEO monthly. 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 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 \$391 million, our company plays a significant role in the Australian market. As of December 31, 2023, the O'Brien® Group employs around 1,200 people across 71 sites and locations. The majority of our workforce are permanent employees, while 9.5% are either fixed-term contractors or casual workers.

We are divided into three divisions of Automotive Glass, Glazing, and Electrical & Plumbing, supported by a shared corporate services division.

**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. In our 2022 statement, we reported in detail on our engagement with 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 88 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 225 non-branded glazing subcontractors, servicing most post codes where Australians live.



#### Electrical & Plumbing

Our network of over 112 electrical and plumbing franchisee businesses provides essential electrical and plumbing services to Australian homes and businesses employing over 1,532 people. Their mobile service sees approximately 800 trade 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.

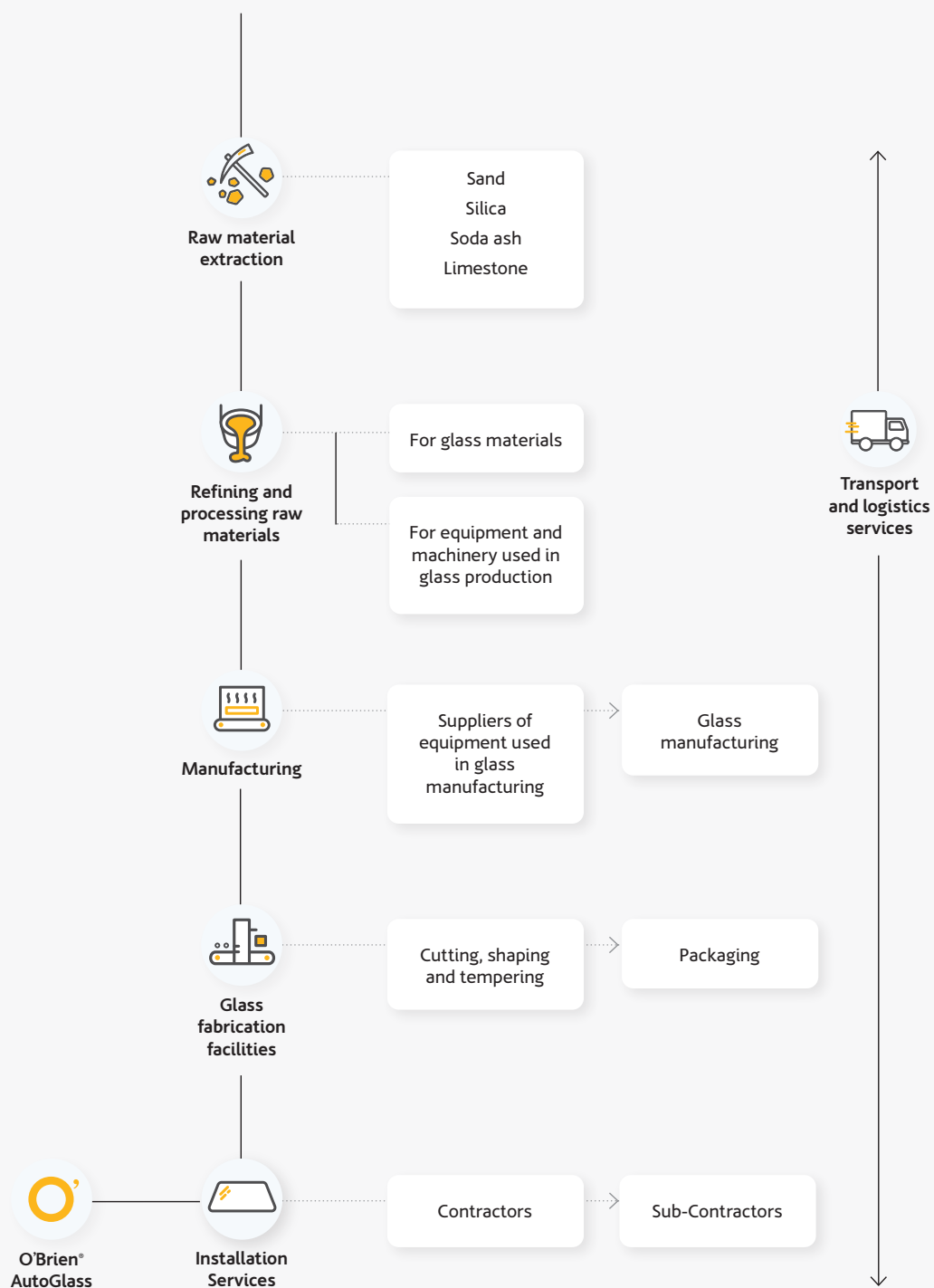


## 2.2 Supply Chain

In 2023, O'Brien® spent \$199 million across 40 procurement categories with 3,870 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 Belron®.



## Automotive Glass



## 3 APPROACH TO RISK MANAGEMENT

While working on the review which ultimately has produced the 2024-26 Roadmap, during 2023 O'Brien® continued to take 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 *Initial risk assessment and prioritisation*

Following on from a detailed social risk assessment undertaken in 2021 which 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. The level of risk for 40 procurement categories was determined based on spend and the inherent transaction risk of the industry. O'Brien® prioritised the outputs of that 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. These included vehicle glass, our Authorised Dealers (vehicle glass subcontractors), flat glass and local service centre 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. Subcontractors in glazing as a category and offshored labour were also included, given their importance to our business and mostly involved direct labour input. Our risk assessment has evolved since 2021.

### 3.2 *Risk assessment and prioritisation in 2023*

In 2023, we reviewed the various categories of supplier risk again as part of the process of developing our Roadmap (2024-2026) and decided to continue in 2023 on our previous work in targeting the 7 higher risk categories of risk where we believed that we have the ability to influence our suppliers. While this will be refreshed again as one of our KPIs in 2024, during 2023 we worked on:

- automotive aftermarket glass and related suppliers such as suppliers of spare parts and materials required to repair or replace windscreens;
- automotive Authorised Dealers;
- flat glass sourced in Australia;
- cleaning services to our head office and four major service centres in metro areas;
- office materials;
- automotive glass original equipment (Branded materials); and
- tools for own use.

As part of our sustainability initiatives, we identified national waste services as an additional category of possible modern slavery risk.

For some categories of supplier, we conducted, or commenced the process of conducting, competitive tender processes which included initiatives to identify

and manage modern slavery risk. These categories include waste services, cleaning of major service centres in metro areas, and office supplies. As part of these competitive tender processes, prospective suppliers were required to agree to our Supplier Code of Conduct, and to provide information about their own modern slavery policy and processes, and how they address risks of modern slavery and in their supply chain.

In addition, we conducted an audit of suppliers of cleaning services provided to 66 smaller service centres. By October 2023, we had obtained the written agreement of 45 (65%) prospective suppliers to comply with our Supplier Code of Conduct and Modern Slavery Policy.

We continued to focus our efforts on automotive aftermarket glass and suppliers of spare parts and materials required to repair or replace windscreens, and on automotive Authorised Dealers. For suppliers of automotive aftermarket glass and suppliers of spare parts and materials, we engaged more closely with the Group Sustainable Procurement Manager in our parent company, Belron®, to understand what activities were undertaken in 2023 to audit and assess global suppliers.

For automotive Authorised Dealers, we conducted training and education on modern slavery at the two conferences of our Authorised Dealers in Sydney and Perth. This raised awareness of the risk of modern slavery as a new issue for most of our Authorised Dealers. For other Authorised Dealers who were already aware of the issue, we provided training, assistance and guidance on how they should be addressing these risks.

### 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 in 2023 already has a sophisticated program of bespoke social and environmental on-site audits. The Belron® Sustainable Procurement Team in 2023, took responsibility for auditing the major product suppliers. Through them, we learned about planned new approaches to sustainable procurement generally, and improved processes and policies for supplier management. These new policies and processes are expected to come into operation in 2024.

The programme of the Belron® Sustainable Procurement Team that was in place in 2023 involves regular risk assessments of suppliers 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 as well as direct dialogue with workers at production sites, which is conducted in local languages by independent audit providers.



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

While there were no audits scheduled for 2023, follow-ups were undertaken with regards to several strategic global suppliers of O'Brien® by the Belron® Sustainable Procurement Team. The further assessments visits followed up on corrective actions identified in previous audits such as working hours; health & safety; employee training, diversity, equity and inclusion and worker/management dialogue. The one supplier who the Belron Sustainable Procurement Team were unable to visit still underwent a formal review. None of the reviews and audits raised any issues of modern slavery.

### **O'Brien Managed Procurement**

Locally, O'Brien® in Australia has continued to seek to leverage its supplier self-assessment questionnaire to assess local supplier approaches to modern slavery for some categories of procurement. In 2023, we focussed our efforts on automotive aftermarket glass and suppliers of spare parts and materials. We sent out 9 questionnaires to local suppliers and one to an overseas supplier which contracts directly with O'Brien. Response rates were disappointing with only 4 responses. However, those who responded demonstrated a good understanding of modern slavery risks and compliance, although we noticed a trend of overlap with management of some of these suppliers by Belron®. We also supplemented our assessment through publicly available research.

As with the work undertaken in 2022, our analysis in 2023 showed that the majority of key suppliers in the vehicle manufacturer category (automotive aftermarket glass and suppliers of spare parts and materials) demonstrated awareness of and compliance with modern slavery obligations. Given lower levels of awareness for suppliers of glazing, we had made the strategic decision in 2022 to pause further follow-ups with glazing suppliers on outstanding questionnaires until a comprehensive review of the existing questionnaire is conducted and our Roadmap is implemented.

In 2023 we continued our efforts with waste, cleaning and office suppliers. We conducted an audit of suppliers of cleaning services provided to 63 service centres. By mid-December 2023, we had obtained the written agreement of 45 (71%) prospective suppliers to comply with our Supplier Code of Conduct and Modern Slavery Policy.

## **3.4      *Development of our Modern Slavery 2024-2026 Roadmap***







Much of our work in 2023 involved an extensive and detailed process over several months to review and improve on processes used in 2022 and prior years. The background to this was a combination of the key learnings gained in previous years and the anticipated reform of the Modern Slavery Act (2018) (Cth) following the publication of the Federal Attorney-General's Department outcome of the statutory review of the Act. Noting that the statutory review resulted in 30 recommendations to substantially strengthen Australia's efforts











to combat modern slavery and is likely to create more rigorous due diligence and reporting requirements, one of our aims in developing our Roadmap was to ensure that our processes are more targeted, robust and effective.

Our Modern Slavery 2023-2025 Roadmap was finalised towards the end of December 2023 and was approved by the Executive Leadership Team on 16 December 2023. It comprises a detailed list of robust steps and goals to be achieved between 2024 and 2026.

### 3.5 Category level risks

In our Modern Slavery 2024-2026 Roadmap, we will review again the 7 higher risk categories previously identified (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).

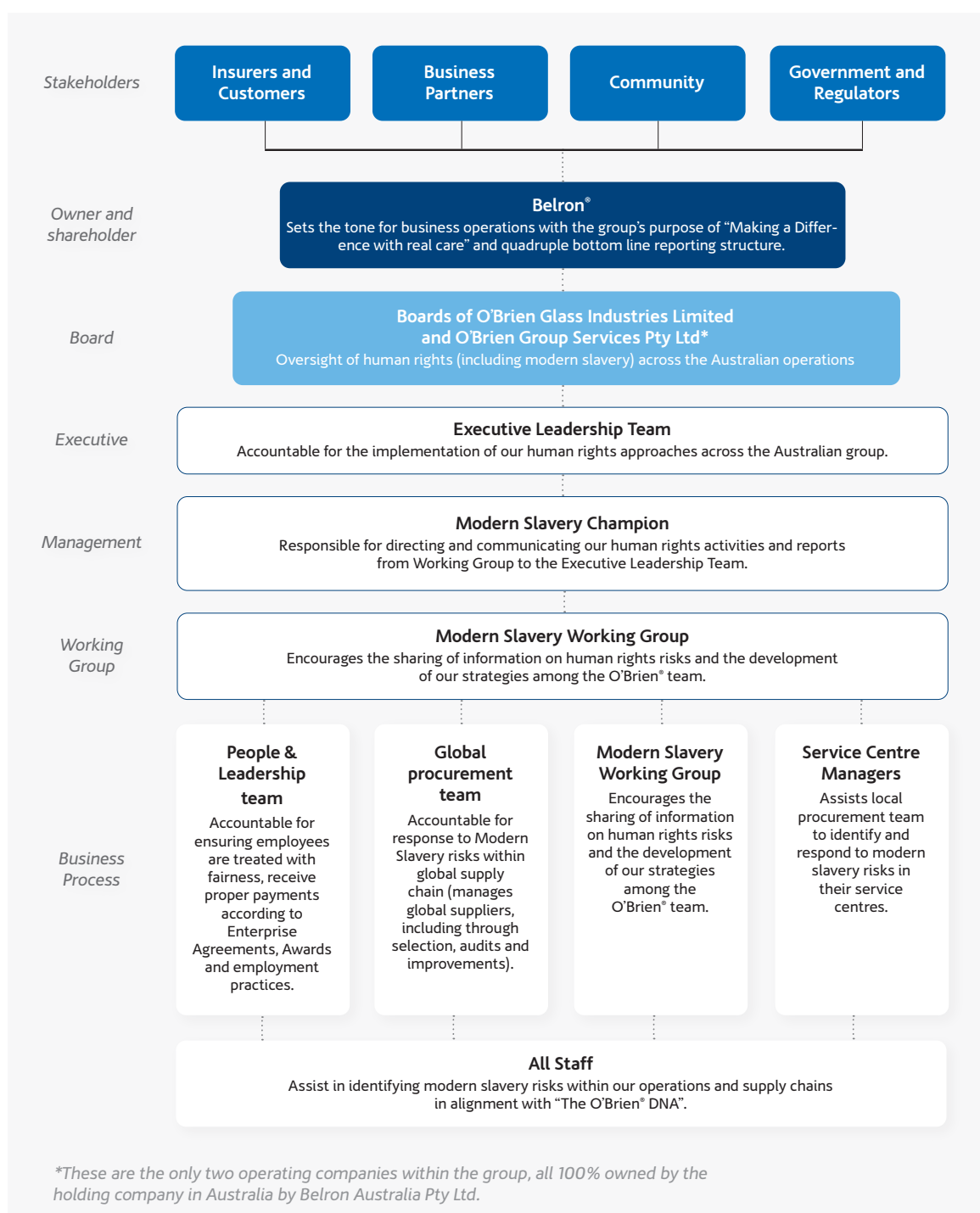
CATEGORY	LATENT RISK	O'BRIEN® LEVEL OF INFLUENCE	DESCRIPTION OF RISK
<b>Automotive Aftermarket Glass</b>	 High	 High	Our glass procurement supply chains, being the largest category of spend, present significant modern slavery risks. These risks involve the exploitation and mistreatment of individuals 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 Service Centres</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 our supply chain and influence with suppliers in this category when we purchase direct is lower.</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 did not change in 2023. They continue to 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 and provide a clear framework for identifying and addressing modern slavery risks. They reflect our cultural understanding that managing these risks is 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 2023, O'Brien® continued to provide bespoke training on modern slavery for executives and key procurement staff via internal delivery with the assistance of an expert consultancy group to develop the materials.

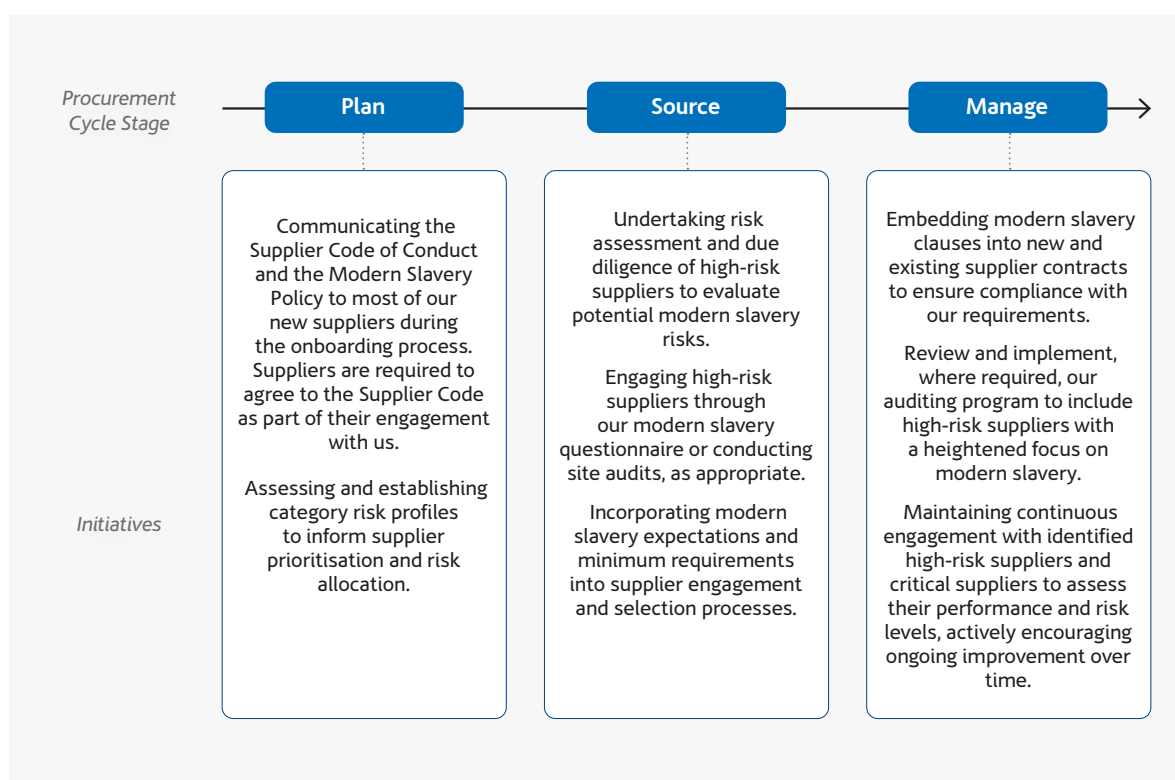
Service Centre Managers who do small amounts of local procurement are required to undertake online awareness training using our internal training system with content from a professional compliance organisation.

In addition, building on previous training materials we created for suppliers, we developed customised training that was delivered to our Authorised Dealers at two conferences (one held in Sydney and the other in Perth) in quarter four of 2023.

### 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 2023 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.

Given we have not implemented this remediation plan with any supplier, we have added this item to our Roadmap for 2024-26 to further develop our policies in this place and run a hypothetical scenario workshop to ensure that our approach would be appropriate.

## 5 MEASURING EFFECTIVENESS

Throughout this report we have discussed our activities during 2023 and marked our success with the criteria we set ourselves for 2023. Not all areas achieved full success on what we set out to do, and many actually proved more complex than originally anticipated. That is one of the reasons for the review and re-set for our Roadmap 2024-26. Where an item was substantially achieved above an estimated 75% level we have assessed as success.

AREA	COMMITMENT	SUCCESS CRITERIA	
<b>Governance</b>	Modern Slavery Working Group will continue to meet regularly.	Modern Slavery Working Group held regular meetings in first half of 2023. For the period April-June 2023, these were almost weekly. Outcomes were reported to the Executive Leadership Team. The second half of 2023 focussed on development of the Roadmap 2024-26.	😊
<b>Policies, systems, and controls</b>	Undertake a review of the O'Brien® current governance, including procurement, policies, and practices against best practice frameworks.	A Gap and Opportunity report was reviewed by the Executive Leadership Team. This part of the work done for the Roadmap 2024-26 Report.	😊
<b>Develop an implementation roadmap</b>	Utilise the outcomes of 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 was reviewed by the Executive Leadership Team and socialised with required staff. It was formally approved on 16 December 2024.	😊
<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.	Bespoke training for procurement staff and Executive undertaken.  Service Centre Managers awareness training.  Training provided for 88 Authorised Dealers at two conferences 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.	Now part of the Roadmap 2024-26.	😐
<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.	Now part of the Roadmap 204-26.	😐
<b>Supplier Engagement</b>	Continue dialogue and reporting with members of the Belron® Group who support management and monitoring of key suppliers.	Belron® Sustainable Procurement Team continue to provide valuable resource to management and monitoring of key suppliers.	😊
<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).	Internal training and awareness continues but external awareness proved more difficult than first anticipated.	😐



## 6 FUTURE COMMITMENTS

The Roadmap 2024/2026 contains 4 goals for our organisation; to embed Modern Slavery through a coherent strategy, to refine our policies, to establish governance responsibilities, and to communicate the impact. For 2024 our activities will be focused on the following.

### 6.1 *Embed Modern Slavery*

The goal is to embed Modern Slavery logically and consistently within the wider ESG framework of O'Brien® by gaining Executive endorsement of Modern Slavery as being part of the way we do things as a Business. We will look for opportunities to integrate Modern Slavery as a pillar in a broader strategic framework. At the same time ensuring we do not simply duplicate activities such as supply chain traceability and responsible procurement actions. This goal will have its roots in 2024 but the wider goal of reviewing the ESG framework will take us in to 2026.

### 6.2 *Refine Policies*

There will be 4 key activities to support this goal. We will revisit the Supplier Code of Conduct to ensure the definition of Modern Slavery is clear and there is a strong understanding of reportable conduct against human rights standards such as ILO's Declaration to Fundamental Principles. In addition, we will review the Whistle-blowers policy and processes to take into the scope of our Speak Up tool external persons such as suppliers and sub-contractors, extending the protection beyond our employees. We will develop greater cohesion in our policies by creating links between the Code of Conduct and the Whistleblowers policy. It is not enough to develop policies we must develop a process to keep them relevant and manage version control.

### 6.3 *Establish governance responsibilities*

This is the "who" of our programme, understanding who has an operational role and developing the operational responsibilities of those who have a role to play. In addition, we will incorporate Modern Slavery into everyday governance activity such as Executive Leadership team meetings, where matters such as risk reviews, updates from Belron®, due diligence and logging incidences will be raised and discussed. It is important that we develop a clear and transparent modern slavery escalation pathway for reportable events to ensure reportable events come to the notice and action of the Executive Lead Team.

### 6.4 *Communicating Impact*

For achieving this goal our main activity for 2024 will centre on our formalising engagement with Belron® for routine knowledge sharing to approaches on engaging with modern slavery risk.

We have summarised these into the following goals for 2024, the first year of our Roadmap 2024-26

ITEM	DESCRIPTION/GOAL/MEASUREMENT
<b>Embed MS through a coherent strategy</b>	Socialise and obtain executive endorsement of the modern slavery Roadmap 2024-26.
<b>Refine Key Policies and reissue</b>	Update the supplier code of conduct to include a clear definition of modern slavery.  Consider reviewing our Whistleblower policy to extend protections in use of Speak Up to internal and external employees/contractors
<b>Better Establish Governance Responsibilities &amp; Reporting</b>	Develop a governance chart outlining operational responsibilities related to modern slavery and document a consistent framework for the Executive Leadership Teams updates on modern slavery.
<b>Define escalation pathways</b>	Define the escalation pathway for "reportable events" from grievance systems and/or Belron <sup>®</sup> audit monitoring
<b>Pilot in very high risk industry</b>	Identify a trusted supplier in a very high risk industry/geography to develop a supplier specific management plan to pilot approaches.
<b>Strengthen Risk Mitigation for High Risk Suppliers</b>	Build external awareness around prioritised categories of modern slavery risk
<b>Strengthen Internal Support to help evaluate High Risk Suppliers</b>	Develop supplier questionnaire evaluation guidance
<b>Review and improve purchasing practices</b>	Review purchasing practices around high-risk direct suppliers (Direct Glass Procurement, Cleaning, and Security) to ensure staff are recruited ethically and receive a living wage
<b>Review and improve purchasing practices</b>	Review supplier performance management process and establish if suitable checks are in place across supply lifecycle
<b>Build modern slavery awareness</b>	Standardise refresher training for employees in key roles, tailored to the functional responsibilities related to modern slavery including procurement
<b>Publish Remediation Framework</b>	Provide information within Supplier Code of Conduct on remediation of harm to individuals
<b>Update Modern Slavery Policy for Remediation Framework</b>	Provide details within Modern Slavery Policy on how O'Brien <sup>®</sup> enables effective remedy
<b>Pilot/ test Remediation Framework</b>	Conduct a mock scenario to test the effectiveness of our remedy pathway