



Modern Slavery Statement 2025



Contents

Message from our CEO	3
1. About this Statement	4
1.1 Consultation and Engagement	4
2. Structure, Operations and Supply Chain	5
2.1 Who we are	5
2.2 Structure	6
2.3 Supply chain	8
3. Our Modern Slavery Risks	10
3.1 Operational Risks	10
3.2 Supply Chain risks	10
4. Our Modern Slavery Risk Management Framework	12
4.1 Tone from the top	12
4.2 Policies and Procedures	14
4.3 Other Controls	15
4.4 Supplier Monitoring and management	16
4.5 Grievance and remediation	17
5. Measuring Effectiveness	18
5.1 2025 Actions and Progress	18
5.2 Reflection on 2025	19
6. Future Actions	21

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.

Artist: Rheanna Lotter, Yuin Nation.



Message from our CEO

For more than 100 years, O'Brien® has been guided by a simple purpose: making a memorable difference with care. Respecting the human rights of every person who contributes to our products and services is central to that purpose. At O'Brien®, we strongly believe that modern slavery has no place in our business, our supply chains, or the communities we serve. This is our sixth Modern Slavery Statement, and it highlights the steps we have taken to identify, manage, and mitigate modern slavery risks in our supply and operations chain.

If I were to identify a key achievement for 2025, it would be empowerment through education. This year we launched a dedicated Modern Slavery eLearning module for every O'Brien® employee — not only those in procurement or management roles, but every member of our team. It builds awareness of what modern slavery is, how to recognise it, and the part each of us can play in preventing it. We have embedded the module into our induction process so that every new employee completes it from day one, and we have committed to refreshing it on at least a 2-year cycle to keep awareness and content current. We also relaunched our confidential Speak Up line, giving our people a safe and anonymous way to raise concerns.

Of course, awareness alone is not enough. Combating modern slavery also demands rigour in how we identify and manage risk across our supply chains — particularly where we source products such as vehicle and building glass from higher-risk regions overseas. During 2025, we continued to strengthen our due diligence, made modern slavery a mandatory consideration in our competitive procurement processes and embedded modern slavery clauses in supplier contracts. We also deepened our collaboration with the Belron® global procurement and sustainability team, whose

programme of supplier assessments and on-site audits extends our reach into parts of our supply chain that we do not directly control.

I am proud of what we have achieved, but I am equally clear-eyed about the work that remains, as modern slavery remains an inherent risk in all businesses. We know we must keep sharpening how we measure the effectiveness of our actions and further develop our remediation approach — and we will. We remain committed to meeting our obligations under the *Modern Slavery Act 2018 (Cth)* and to improving year on year.

Addressing modern slavery requires all of us to be informed, alert and willing to act. I am grateful to every member of the O'Brien® team who contributes to this effort — your energy, care and vigilance make a real difference.



A handwritten signature in black ink that reads "Miles Wilson".

Miles Wilson

CEO and Managing Director
O'Brien®

1. About this Statement

This Modern Slavery Statement (**Statement**) sets out actions taken by Belron Australia Pty Limited and its related entities (O'Brien®) to assess and address modern slavery risks in its operations and supply chain for the financial year commencing 1 January 2025 and ending 31 December 2025, in compliance with the *Modern Slavery Act 2018 (Cth)* (the **Act**).

This Statement covers Belron Australia Pty Ltd (the Australian holding company in O'Brien®) and all its controlled entities as defined under the Act, including the entities shown in the diagram in section 2.1 Structure, many of which are not operating entities. The two main trading entities are:

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

A joint statement has been prepared as these entities use the same policies, systems and processes.

This Statement meets the mandatory criteria set out in the Act.

1.1 Consultation and Engagement

O'Brien® applies uniform policies, systems, and processes across all the Australian entities. The executive leadership team develops and approves our sustainability and governance strategy, which encompasses human rights and the preparation of the annual modern slavery statement. Our group-wide governance approach means that 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 within their business unit.

The leadership team is supported by the Modern Slavery Working Group, which is responsible for creating and implementing operational and procurement controls to mitigate modern slavery risks within the business.

The Modern Slavery Working Group, comprising senior leaders from our Supply Chain, Operations, Procurement, Finance, Legal, and HR teams, provides regular updates to the Legal Director, who then reports them to the Executive Leadership Team. These updates, along with any resulting operational or procedural changes, are compiled and reported in the annual Modern Slavery Statement. The O'Brien® leadership team has approved this Statement prior to its submission and approval by the relevant company board. The directors of each Belron Australia Pty Ltd and the two trading entities mentioned above have endorsed this joint Modern Slavery Statement.



2. Structure, Operations and Supply Chain

2.1 Who we are

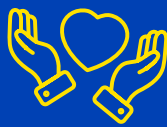
O'Brien® has grown from humble beginnings to become one of Australia's most iconic companies. In 2024, O'Brien® celebrated its 100th anniversary serving Australians in glass and related industries.

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 – one of the world's leading vehicle glass replacement and repair companies, now operating in over 30 countries. O'Brien® continues to be 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.

O'Brien® is part of the Belron Group, the world's leading vehicle glass repair and replacement company. D'leteren, a listed company on the Euronext in Brussels, is the major shareholder of Belron®.

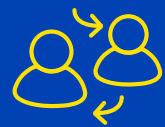
Our purpose. Our DNA

Making a memorable difference with care



Caring

We show concern and care for our team mates, our customers, our business partners, our environment and our community.



Collaborative

We believe we can accomplish more by working together. We all have an important role to play and by supporting others, we become stronger ourselves.



Genuine

We act with integrity and with respect for others in a way that generates trust in us. We do not compromise our values or our standards.



Driven

We believe in the extraordinary, not the ordinary, and are relentless in its pursuit. We believe that it can be done and we will do it.

2.2 Structure

Belron Australia Pty Limited operates through its subsidiaries within O'Brien®, comprising O'Brien Glass Industries Limited and O'Brien Group Services Pty Ltd. O'Brien Glass Industries Limited provides vehicle and building glass repair and replacement services and O'Brien Group Services Pty Ltd provides 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 \$481 million, our company plays a significant role in the Australian market. As of December 31, 2025, O'Brien® employed 1460 people across 86 sites and locations. The majority of our workforce are permanent employees, while 153 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.



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 208 seats. It also includes the required operations to support the services, such as importing vehicle glass and ancillary products, as well as distribution centres across Australia. The services are provided through our employees and approximately 78 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 17 staff 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 approximately 185 non-branded glazing subcontractors, servicing most postcodes where Australians live.



Electrical & Plumbing division

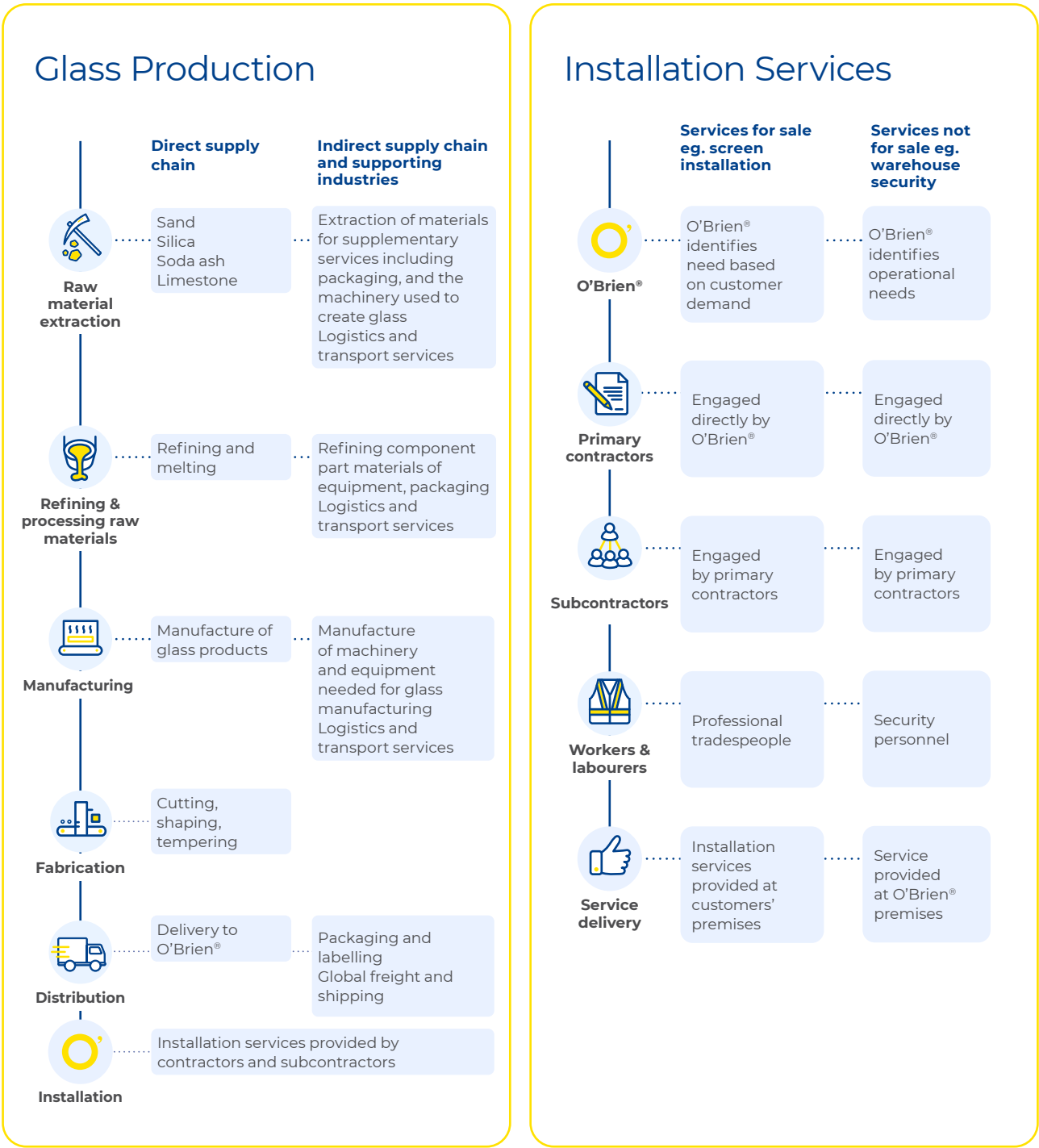
Our network of 99 electrical and plumbing franchisee businesses provides essential electrical and plumbing services to Australian homes and businesses, employing 1393 people. Their mobile service has 825 trade vehicles on the road delivering services in all States around Australia. Our division employs a small group of employees who provide these businesses with operational, administrative, marketing and networking support services.

Support services includes the everyday operations of corporate offices and support for the three divisions, plus executive, HR, finance, IT, procurement, legal, sales, marketing and central administration functions. Some business support services are provided by third-party providers. For example, we have a Business Process Outsourcing based in Manila comprising approximately 23 agents. They support multiple functions across O'Brien® including accounts payable, contact centre, fleet authorisations and central billing. We previously reported on our engagement with Acquire (see O'Brien® Modern Slavery Statement 2022). Acquire is based in the Philippines and provides business support services to the O'Brien Group Services team in the franchise network.

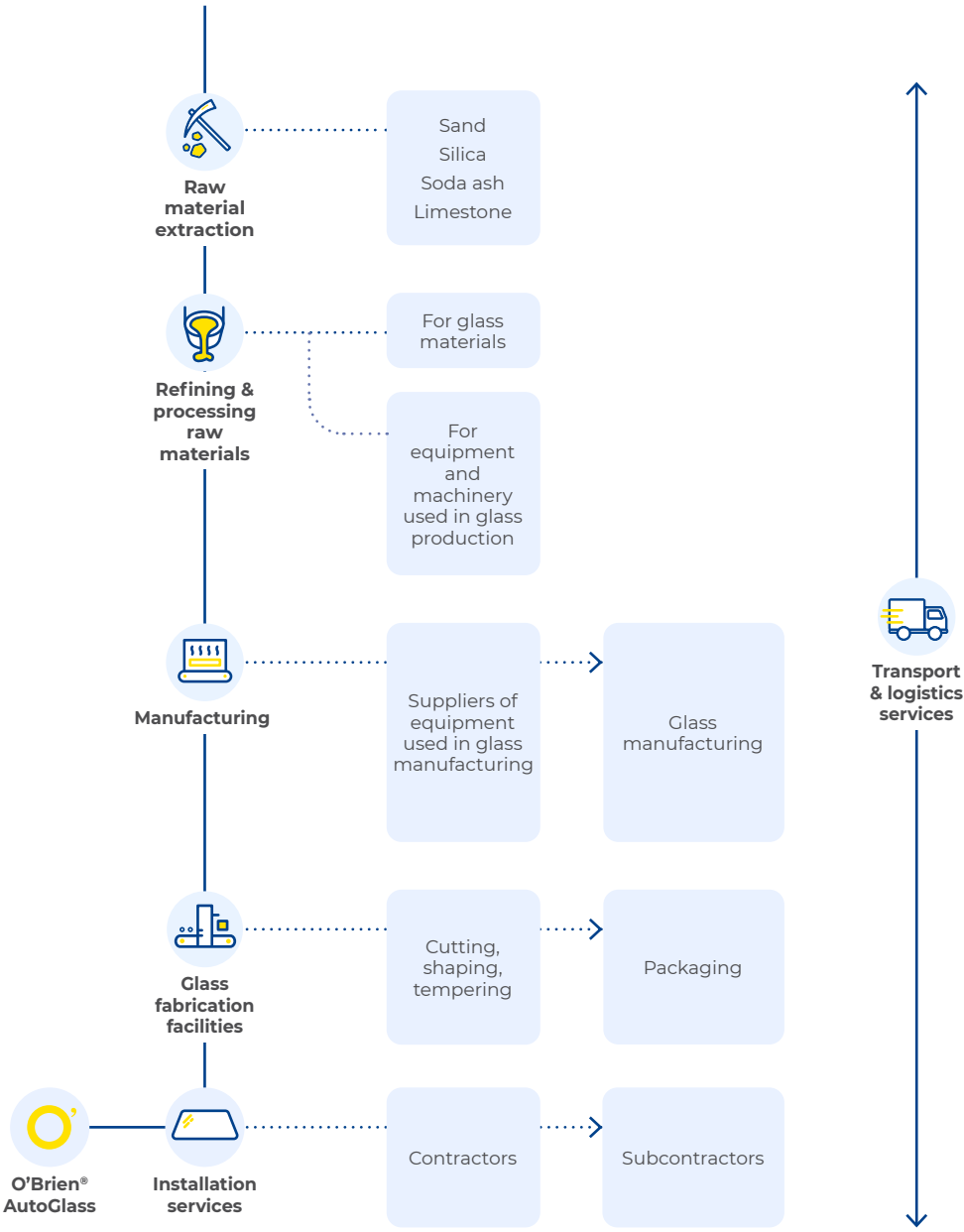
2.3 Supply chain

In 2025, O'Brien® spent approximately \$273 million across 43 procurement categories with 2,893 suppliers. While the majority of Tier 1 suppliers are in Australia, the largest spend for the automotive glass division comes from suppliers in Asia. In this category, O'Brien® is responsible for glass procurement, and the supplier management is either directly controlled by O'Brien® or shared with our parent company, Belron®.

Key supply chains



Automotive Glass Production



3. Our Modern Slavery Risks

In line with the United Nations Guiding Principles on Business and Human Rights, O'Brien® understands "modern slavery risks" as referring to the potential for its business to cause, contribute or be directly linked to modern slavery. We recognise that the level of modern slavery risk in our operations and supply chains is based on several factors. We have incorporated geographic, sector and product specific factors into our risk assessment processes. Apart from the risk to our business, we also assess modern slavery risks from the lens of "risk to people".



3.1 Operational Risks

O'Brien® protects the labour standards and human rights of its employees through its human resources policies and recruitment practices. Our employees are employed directly, with their employment terms and conditions set out in employment contracts governed by Australian employment laws and relevant awards. All recruitment is managed through a centralised recruitment function, which includes ensuring that candidates' Right to Work checks are completed prior to offers being made. Remuneration for all employees is reviewed on an annual basis. Additionally, all permanent employees are given the opportunity to participate in a global engagement survey at least once every year. This complements the existing internal and external grievance reporting mechanisms in place in Australia. Where we use temporary labour, we have measures such as Right to Work checks to support risk management.

3.2 Supply Chain risks

Under our Modern Slavery 2024–2026 Roadmap, we have continued to focus on the categories where we can most effectively influence our supply base. We assessed the inherent risk for each category to better understand the extent to which O'Brien® and/or its suppliers may cause, contribute to, or be directly linked to modern slavery risk, and then considered that against our ability to influence outcomes. We have not changed this list because, after reviewing our suppliers, we found no substantial change to our business model. While some individual suppliers changed for commercial reasons, this did not alter our overall approach to supply chain governance.

Within these categories, local and global team members worked together to manage the supply chain, as shown in our Governance table.

Governance Table

Category	Latent risk	O'Brien® level of influence	Description of risk
Automotive aftermarket glass	 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.
Flat glass sourced in Australia	 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.
Cleaning services to service centres	 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.
Automotive Authorised Dealers	 Low	 High	Risks in this category come from two sources. Firstly, we have the same risks within our materials supply as for aftermarket glass as we supply this glass to our Authorised Dealers. 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.

Category	Latent risk	O'Brien® level of influence	Description of risk
Office materials	 High	 Low	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.
Vehicle glass Original Equipment (branded materials)	 High	 Low	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.
Tools for use	 High	 Low	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.
Glazing Sub-Contractors	 Low	 Low - Medium	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.

4. Our Modern Slavery Risk Management Framework

4.1 Tone from the top

Our governance structure and policies remained unchanged in 2025 and continued to underpin our approach to human rights risks, including modern slavery. Together, they embed core values of O'Brien® and provide a clear framework for identifying and managing these risks. They also reflect our view that addressing modern slavery is a shared responsibility across the organisation, supported by a structured, consistent and coordinated approach. This helps us mitigate risk and maintain our commitment to ethical business practices.

Governance Structure



*These are the only two operating companies within the group, all 100% owned by the holding company in Australia by Belron Australia Pty Ltd.

4.2 Policies and procedures

Our zero-tolerance approach to modern slavery is reflected in our strong suite of policies and controls that support the management of modern slavery risk, as set out below:

Document title	Overview
 Code of Conduct - “Our way of working”	“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. In 2025, every employee was asked to complete an acknowledgment in relation to the Code of Conduct.
 Human Resources Policies	Our dedicated People and Leadership Team oversee 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.
 Modern Slavery Policy	Our Modern Slavery Policy sets out our commitment to the elimination of modern slavery, human trafficking, and all kinds of exploitation practices, as well as our expectations of our suppliers. It also aligns with the United Nations Guiding Principles on Business and Human Rights and the <i>Modern Slavery Act 2018 (Cth)</i>. It applies to all team members, contractors, and suppliers in Australia and overseas, including the workers in our extended supply chains, and those who 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.
 Supplier Code of Conduct Policy	Our Supplier Code of Conduct applies to all our suppliers. It sets out the minimum standards of behaviour that O’Brien® 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. The Supplier Code of Conduct also forms part of competitive procurement processes so that prospective suppliers are made aware of requirements very early in any supply relationship.
 Whistleblower Policy	The O’Brien® Whistleblower Policy is designed to promote and support a culture of honest and ethical behaviour within O’Brien®. It encourages employees to speak up about any potentially corrupt, illegal, or concerning conduct. The Policy applies to all businesses within O’Brien® and covers various individuals, such as directors, employees, contractors, and suppliers. Stakeholders may use this publicly accessible mechanism to report indicators of modern slavery risk. In addition, all team members have access to the Belron® Speak up line as an alternative mechanism for reporting potentially concerning behaviour. In 2025, the Speak Up line was re-launched globally. The Speak Up line is managed by Belron Group for the benefit of all Belron business units.

4.3 Other controls

Global sourcing

Many of our highest-risk products and services are procured through global supply channels managed centrally within our parent company, Belron®. This approach enables consistent standards, stronger supplier oversight, and more effective management of environmental and social risk across our supply chain.

Global procurement policy: The Belron® Procurement Risk and Sustainability Team (Global Team), based at the Belron® Group Head Office in the UK, is responsible for global procurement policy and human rights due diligence for major suppliers of products and services across the Group. To support this work, the Global Team runs a programme of tailored social and environmental assessments and on-site audits.

Global Progress in 2025: Following the launch of the Belron® Global Procurement Policy (Policy) in 2024, across 2025, the Global Team focused on embedding the policy into day-to-day sourcing, contracting, and supplier management across all categories and regions.

The Policy provides a consistent framework to ensure procurement activities:

- are conducted with integrity and transparency;
- identify and manage environmental and social risks, including modern slavery;
- support Belron® Responsible Business objectives; and
- deliver long-term value and supply chain resilience.

Global due diligence programme: Belron® operates a structured due diligence programme to identify, assess, and manage environmental and social risks across its supply base (Programme).

In 2025, this Programme evolved from a compliance-led approach towards a more risk-based and insight-driven model, with greater focus on prioritising high-risk suppliers, strengthening engagement, and driving measurable improvement. Risk assessments are conducted regularly across global suppliers, including consideration of modern slavery risks. These assessments incorporate both remote reviews and on-site audits delivered by independent third-party providers. On-site audits follow a bespoke methodology aligned to the Belron® Supplier Code of Conduct and applicable labour, health and safety, and environmental regulations. They include worker interviews conducted in local languages to better understand working conditions in practice. Findings are shared with Belron® and used to drive corrective actions and ongoing supplier engagement.

Influencing within our aligned associations.

In addition, building on previous training materials we created for our business partners, we shared customised training with the Australian Glass & Window Association in 2024. The Australian Glass & Window Association comprises mostly small businesses, and O'Brien® is a clear industry leader within this group. In 2025, we continued to engage with the Association on modern slavery.

4.4 Supplier Monitoring and management

Global activities

O'Brien® maintains direct relationships with key suppliers, including those operating in higher-risk regions, and engages with them both remotely and in person to build visibility of working conditions and potential risks. This direct engagement is supported and strengthened by the Belron® centralised procurement and sustainability framework, including shared due diligence processes, risk assessment tools, and audit programmes. Together, this approach strengthens the identification, assessment, and management of modern slavery risks across the supply chain.

Local activities

In 2025, to support the anti-modern slavery approach taken by O'Brien®, the local procurement team undertook a range of activities with local suppliers during the pre-contract phase and during the life of the contract with the supplier. Our local activity supported our 2025 goal to better document how we manage modern slavery risk throughout the supplier contract lifecycle, from supplier selection through to ongoing contract management. We mapped this lifecycle, including key points for regular supplier discussions and continuous improvement, to embed modern slavery risk management in everyday supplier management.

Testing Supplier Commitment to Modern Slavery: Prospective supplier commitment was tested in two ways:

1. Mandatory questions were asked of the prospective suppliers in a formalised RFx process. The questions asked included:
 - Does your organisation have a modern slavery statement? If so, please provide a copy.
 - How does your organisation vet sub-contractors to eliminate the risk of modern slavery act breaches?
 - Do you agree to adhere to the *Modern Slavery Act 2018 (Cth)*

Categories where this formalised approach was applied in 2025 included Fleet (FMOs) and Freight Forwarding (International Freight – Sea and Air).

For procurement categories such as freight forwarding, an additional question was asked:

- Has your organisation implemented any of the recommendations set forth in the Modern Slavery within Maritime Shipping Supply Chains Publication of December 2022.
- What, if any, recommendations have your organisation implemented?

2. Agreement to a modern slavery clause in renewed contracts
O'Brien® developed a modern slavery clause for inclusion in contractual documentation from suppliers that did not already have a suitable clause. The O'Brien® modern slavery clause was included in the renewed Uniforms contract and Waste Management/Recycling contract.

Suppliers were also required to provide a copy of their Modern Slavery Statement/Policy for inclusion in the contract. It is acknowledged that not all suppliers are required to complete a Modern Slavery Statement under the Act, so this was only requested of qualifying suppliers.

In addition, a yearly review checklist has been developed, which covers all aspects of modern slavery management as follows:

- Policy & Governance,
- Labour & Workforce Indicators,
- Supply Chain Transparency,
- Risk Assessment,
- Incident Management,
- Risk,
- Issues & Compliance (if required); and
- a Forward Plan

The purpose of the checklist is to ensure we check the supplier's ongoing commitment to anti-modern slavery practises. It also ensures it forms part of our annual review of their performance.

Modern Slavery Working Group

The Modern Slavery Working Group (MSWG) continued to meet regularly to discuss matters relevant to the Business and provide a central focus for our modern slavery prevention activity. The MSWG maintained regular reporting to the Executive Team as part of the usual reporting structure, ensuring a high level of awareness and commitment across the business. The MSWG is sponsored by two key members of the Executive, the Director of Operations and Supply Chain, and the Director of Legal. Both Directors engaged with the MSWG throughout the year to support activity.

Collaboration globally

The Global Team undertake a critical role in the management of key overseas suppliers to O'Brien®. It was recognised by O'Brien® that regular contact with the Global Team was critical to maintaining visibility over the due diligence undertaken by the Global Team. In the past, the communication between the Global Team and our local procurement employees had been inconsistent. O'Brien® set a goal in 2025 to re-engage with Belron® Group following the launch of Belron® Group Procurement Policy for routine knowledge sharing. We established a quarterly meeting with the Global Team to discuss common Modern Slavery matters and the management of key overseas suppliers.

4.5 Grievance and remediation

Our Whistleblower Policy and hotline are our primary channels for raising grievances. In 2025, 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 that 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 wellbeing.
- 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 and 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

5.1 2025 Actions and Progress

In our 2024 Statement, we committed to an action plan for 2025 to continue strengthening our modern slavery risk program. We achieved several important outcomes, but we also acknowledge that we did not complete everything we set out to do. The table below summarises our progress against those commitments, including where actions remain in progress or were not undertaken.

Item	Description/Goal/Measurement	Progress
Continue to embed modern slavery.	All new service centre managers complete training as part of induction and all existing service centre managers refresh their training on modern slavery. Communicate Speak Up line to visitors to our premises.	
Provide procurement-specific training to global and local procurement staff with purchasing responsibilities, which identifies our high-risk categories and defines expectations.	Training provided to 100% of key team members who undertake procurement activities in high-risk categories.	Completed 
Review and update the Charter or terms of reference for the Modern Slavery Working Group including reporting requirements, to incorporate changes to procurement practices for both local and global.	Executive endorsement of updated Terms of Reference.	Completed 
We will begin mapping the second tier of strategic categories for high-risk suppliers.	The supply chains of two high-risk categories have been mapped to Tier 2.	In progress 

Item	Description/Goal/Measurement	Progress
Test suppliers' commitment to the grass roots of their organisation.	Develop and provide a voluntary survey to employees and contractors of one key supplier.	Not undertaken 
Facilitate a workshop with suppliers of high-risk category items to understand what controls are commonplace; seek to reinforce these as expectations in supply arrangements.	Conduct workshops with two key suppliers in high-risk category items to understand what controls are commonplace. Incorporate/document findings from the workshops in procurement processes.	Not undertaken 
Create a contract management plan with a template agenda for supplier meetings to standardise ongoing dialogue with suppliers throughout the life of the supply arrangement.	A map of the contract lifecycle with timeframes to engage in conversations on continuous improvement. (relationship management/ performance review plan).	Completed 
Re-engage with Belron® Group following the launch of the Belron® Group Procurement Policy for routine knowledge sharing.	Quarterly meeting with Belron® Group on common modern slavery matters.	Completed 
Publish Remediation Framework.	Provide information within the Supplier Code of Conduct on remediation of harm to individuals.	In progress 

5.2 Reflection on 2025

Focusing on meaningful supplier engagement

While identified in our 2024 Statement as goals, we did not undertake activity in support of the following goals:

- Test Suppliers' commitment to the grass roots of their organisation; and
- Facilitate a workshop with suppliers of high-risk category items to understand what controls are commonplace; seek to reinforce these as expectations in supply arrangements

The procurement team decided these goals would not meaningfully address modern slavery risk with prospective or existing suppliers. Instead, they focused on building a clearer supplier selection and contract management process, supported by regular supplier discussions and one-on-one follow-up where needed.

Educating our people

In 2025, O'Brien® made training on modern slavery a mandatory requirement for all employees. Our focus was simple but powerful: empowering our people and bringing our values to life in how we prevent modern slavery. We recognised that meaningful change happens when everyone at every level feel supported, informed, and equipped to act.

Our stated goal for 2025 was to update the modern slavery module and achieve 100% completion by our:

- New service centre managers; and
- key team members who undertake procurement activities in high-risk areas.

As noted above, we met this goal with 100% participation by the identified groups.

Modern Slavery eLearning Module: In implementing the actions required to complete the Education goal, we quickly saw a larger opportunity. Instead of limiting this important knowledge to procurement-focused roles, we expanded our approach to reach all employees because everyone has a role to play in identifying and preventing modern slavery.

The result was an eLearning module designed to build awareness and confidence to act across the business. It introduces what modern slavery is, highlights how it can present in everyday situations, and provides practical guidance on what to do if something doesn't feel right. Crucially, the training reinforces that modern slavery can exist in plain sight and encourages our people to stay curious, alert, and proactive in their day-to-day work. The module was rolled out to all employees in August 2025. We achieved 48% completion by staff in 2025, and we look forward to reaching more of our staff in 2026.

To ensure this knowledge remains fresh and embedded in our culture:

- it is now a mandatory training for all employees every 24 months;
- we have also embedded this training into our onboarding process, ensuring every new employee who joins O'Brien® has a clear understanding of the risks, the signs to look for, and the actions they can take.

From day one, our people are empowered to be part of the solution. This reflects our belief that preventing modern slavery isn't a one-time initiative; it's part of who we are, in our DNA.



Global Belron® Speak Up line: At the same time, we strengthened the ways our people can safely speak up. We introduced our Global Belron® Speak Up line. The Global Belron® Speak Up line is a confidential and anonymous online platform and hotline where concerns, including those related to modern slavery, can be reported without fear. Implementing this system for O'Brien® was not without its challenges. Early on, we encountered practical issues, from calls not reaching the right destination to our external provider failing to recognise the O'Brien® brand. We continued testing, learning, and improving until we got it right. Today, the Speak Up line is fully operational and supported by clear guidance and visibility across the Business.

To make this resource as accessible as possible, we developed and distributed posters (as shown below) for display across all service centres, created a dedicated page on our internal employee hub, and included Speak Up information in every new starter's welcome pack. Together, these initiatives reflect our commitment to creating a culture where people feel informed, supported, and empowered to act. Preventing Modern Slavery is not the responsibility of a few; it's a shared commitment across our entire organisation.

Together, these initiatives reflect our commitment to creating a culture where people feel informed, supported, and empowered to act. Preventing Modern Slavery is not the responsibility of a few; it's a shared commitment across our entire organisation.

Zero Reports of Instances of Modern Slavery: We reinforced our awareness program with a refresh on whistleblower awareness. This included ensuring our Speak Up Line was fit for purpose and raising awareness by placing posters at O'Brien® service centres across Australia. O'Brien® recognises the inherent risk of modern slavery in every supply chain and continuously reviews and monitors our reporting process to ensure it remains accessible and effective. We have continued to emphasise the importance of utilising our whistleblower policies to report any concerns.

6. Future Actions

O'Brien® is committed to further developing its modern slavery risk program as part of our broader approach to responsible sourcing. In 2025, we plan to:

2026 Goal	Measure
Empowerment	
Review and refresh/update (if appropriate) Modern Slavery eLearning module before it is rolled out again to all employees as part of the 24-month refresh program	The review and refresh of the Modern Slavery training offering is 100% complete.
Empowerment	
Bespoke training for the National Procurement team	100% of the National Procurement Team completed the bespoke Modern Slavery in person training module.
Good practice	
Procurement Integration: Modern slavery requirements embedded in RFX processes and part of criteria for supplier evaluation for tender.	100% of supplier performance management quarterly reviews undertaken by the national procurement team include a review of the supplier's modern slavery prevention.
Good practice	
Contractual Controls: Include fit-for-purpose modern slavery clauses in all new, renewed, or renegotiated contracts.	100% of new or renewing material supply agreements completed by the national procurement team have fit-for-purpose modern slavery clauses.
Good practice	
Supplier Performance Management: make modern slavery a standing component of how we manage our suppliers.	100% of supplier performance management quarterly reviews undertaken by the national procurement team include a review of the supplier's modern slavery prevention.
Supply Chain Mapping	
Complete Tier 2 supply chain mapping for at least 1 high-risk category.	100% Tier 2 Supply chain mapped for at least 1 high-risk category.

Statement Approval

This Statement has been reviewed and approved by the Board of Belron Australia Pty Ltd on 29 June 2026 in its own capacity and on behalf of the entities that it owns and controls that are reporting entities for the purposes of the Modern Slavery Act (Commonwealth) 2018.



A handwritten signature in black ink, appearing to read 'Miles Wilson'.

Miles Wilson

CEO and Managing Director O'Brien®