
Visy Communication on Progress

17th August 2016

Statement of Support by the Chief Executive Officer

I am pleased to confirm that Visy reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this, our second annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its Principles into our business strategy, culture and daily operations

We also commit to share this information with relevant stakeholders using appropriate channels of communication.



Brian McPheely
Chief Executive Officer

Human rights

- **Principle 1** : Business should support and respect the protection of internationally proclaimed human rights
- **Principle 2** : Make sure that they are not complicit in human rights issues

Assessment, Policy and Goals

Visy supports the United Nations Declaration of Human Rights. Our company has a core value of treating all people with dignity and respect.

As a company, we believe in a workforce that is diverse and free from harassment, bullying, victimisation or unlawful discriminatory practices and behaviour. Our company values, obligations and expected standards of behaviour toward each other, as well as customers and suppliers, are detailed in our range of Human Resources, Legal and Health and Safety policies and our Code of Conduct and Supplier Code of Conduct. These policies address human rights issues, including not using child labour, not engaging in discrimination, vilification or occupational violence.

As we continue to expand our business across Asia and lengthen Visy's supply chain, we remain committed to our aim of providing a safe and engaging workplace for our employees. This commitment extends to the workplaces of our suppliers. In joining the Global Compact, Visy is confirming this commitment as a key element of the continual growth and success of our operations.

Implementation

As a global employer and purchaser of services and goods, Visy appreciates that it has an important role to play in the advancing human rights. In the first instance, our operations outside of Australia (where our Corporate Office is based), must comply with all local laws as a minimum standard, these operations must also comply with any higher order requirements of Visy's Corporate policies, including our HSE Management System.

Visy vests responsibility for implementation of its principles and obligations against child and forced labour with management at Visy's Australian and international facilities. As a company, we are working with our supplier base to confirm support for the principles in our Supplier Code of Conduct.

In addition, Visy espouses 'For a Better World' and actively seeks causes to support within the community. For example, through the Pratt Foundation, Visy's Matching Gifts program can match dollar for dollar donations by Visy employees to certain recognised charities. Visy also supports a number of human rights causes through the Pratt Foundation. For example Visy supports, and has this past year increased funding support to, Hagar Australia which operates front-line services internationally including in Cambodia and Vietnam for recovery

and employment services for the survivors of trafficking, slavery and other forms of human rights abuse.

Visy has recently commenced a mapping exercise to identify where the 17 Sustainable Development Goals (SDGs) relate to our current and planned activities. This is intended to highlight to our company key areas for increased alignment with the SDGs. Whilst some SDGs may not be directly relevant to our operations, we may identify some further opportunities to take action where there are gaps.

Visy believes that all humans have a right to safety and takes its obligation and duty to provide a safe and healthy work environment seriously. Visy's Safety Policy outlines the aims and actions in place to protect our employees, contractors and visitors from exposure to harm as part of our operations. Our company's commitment to health and safety is put into practice through the effective implementation of its Standards and Codes of Practice.

Measurement of outcomes

- All suppliers across Visy have been issued with a Supplier Code of Conduct which they are required to abide by
- Seeking confirmation of support by supplier base with the principles in our Supplier Code of Conduct

Labour

- **Principle 3** : Business should uphold the freedom of association and the effective recognition of the right to collective bargaining
- **Principle 4** : The elimination of all forms of forced and compulsory labour
- **Principle 5** : The effective abolition of child labour
- **Principle 6** : The elimination of discrimination in respect of employment and occupation

Assessment, Policy and Goals

Visy supports the International Labour Organization's (ILO) core conventions. This support includes a commitment to ensuring our fibre inputs are not sourced from wood harvested in violation of traditional and human rights or the ILO's core conventions. This commitment is captured in Visy's Pulp and Paper Fibre Procurement Statement.

As mentioned above, our company values, obligations and expected standards of behaviour are detailed in our range of policies and codes of conduct, which address labour rights such as not using forced labour, compliance with applicable wage laws, equal opportunity employment, employee rights for worker organisations and not discriminating against an individual or group.

Visy's range of Human Resources policies and guidelines define our requirements and expectations across the employment spectrum, including recruitment and selection, remuneration and salary options, induction and training, leave and flexible work arrangements, and performance review and disciplinary actions.

During 2016 we intend to continue to apply our supply chain management principles, including code of conduct and minimum standards, with regards to new suppliers and new operations across Asia.

Implementation

Visy is committed to social sustainability. This means we support a highly engaged and capable workforce and contribute to a more sustainable and inclusive society for our employees and the broader community. Our range of Development and Training programs show our commitment to not only developing talented people but also ensuring all our employees understand our expectations as a company and their obligations in workplace behaviour.

Visy believes it is our duty to provide a safe and healthy work environment. Our Health, Safety and Environment (HSE) System, together with our Incident Management and Learning Management Systems, create structure and consistency in the planning, implementation and management control of HSE issues.

With our high standards and achievements for our Australian Workforce, Visy's goal is to translate this into our expanding overseas operations, especially in the Asia-Pacific. To achieve this, during 2016 we will continue to implement our values and expectations through embedding them into the management systems of our new operations and supply chains.

Measurement of Outcomes

In 2015 Visy employed 5,215 people. More than 90% of our Australian & New Zealand workforce is employed on a full time basis, while less than 3% is employed on a casual basis.

Visy believes a strength of its Health, Safety and Environment (HSE) System is the internal audit program to review compliance, conformance to the system, management of key hazards and housekeeping. We also endeavour to minimise any personal, social and economic consequences of workplace incidents through our Return to Work process. Visy recognises and celebrates health and safety achievements through various awards earned on measureable performance. For example, in June 2016 Visy Packaging Thailand received an award for achieving 1,400 Recordable Injury Free Days - an achievement which is a reflection of the management team's leadership and drive to create a safe manufacturing experience and environment.

Environment

- **Principle 7** : Businesses should support a precautionary approach to environmental challenges
- **Principle 8** : Undertake initiatives to promote greater environmental responsibility
- **Principle 9** : Encourage the development and diffusion of environmentally friendly technologies

Assessment, Policy and Goals

Visy is an integrated packaging and resource recovery company and one of Australasia's largest resource recovery / recycling companies. Sustainability is at the core of our business. We believe that being truly sustainable is a journey of continuous improvement, learning and adaptation.

Our Environmental Sustainability Objective is to maximise energy efficiency, maximise recycling, minimise water use and minimise waste to landfill. Visy sees wastes as an opportunity for closed loop manufacturing and, for materials that are recyclable, we collect and aggregate such waste for feedstock for remanufacturing of packaging materials.

Visy owns and operates a range of businesses around the world which perform in many different cultural environments and regulatory frameworks. Visy's Health, Safety and Environment Management System is designed to transcend these diverse operating environments to make sure that the health and safety of our workers, and the environment, is paramount wherever we operate. Our Environmental Policy confirms our commitment to compliance with all applicable local laws and regulations as well as sustainable development, environmental improvement and minimising our impacts on the environment.

Our sites have an environmental management system based on the structure of the International EMS standard ISO 14001 that forms part of our HSE Management System and our manufacturing sites are audited annually. Third party auditors externally certify Visy's material environmental risk sites, the paper mills at Gibson Island QLD, Smithfield NSW, Tumut NSW, Coolaroo VIC and Reservoir VIC to ISO 14001.

Visy is committed to sustainable fibre sourcing for our recycled content and virgin papers that are the predominant input into the fibre packaging products we produce. We are a member of the Australian Forest Products Association (AFPA), the corresponding body to the International Council of Forest & Paper Associations, which represents industries across the forest products value chain, including pulp and paper. Visy has supported the uptake of internationally recognised forest certification schemes which allows consumers to have confidence that the products they purchase are derived from sustainable forest management practices. Our Visy Pulp and Paper Fibre Procurement statement details how we make sure our virgin and recycled fibre sources are certified against the relevant accredited standards (including the Forest Stewardship Council) and support sustainable forest management by

sourcing wood fibre from suppliers that are economically viable, environmentally responsible and socially beneficial.

In Australia, where we have approximately 100 operations sites, Visy is required to report to the National Pollution Inventory (NPI), National Greenhouse and Energy Reporting Act (NGER), and The Australian Packaging Covenant (APC). We are also required to submit annual returns for our licensed sites to the respective state authorities.

Visy's energy committee sets targets and performance indices for a range of energy and waste factors across the company's manufacturing divisions and sites. These include unit-of-production based energy consumption for electricity and gas, landfill waste volume, avoided landfill volume via energy recovery at the company's three Australian energy-from-waste plants, and carbon emissions.

Visy promotes awareness of the value and importance of recycling to businesses, schools and the community through a number of programs. Visy's *Project R* operates at five centres across Australia. Aimed at primary school students, *Project R* is an educational program based on the National School Curriculum that can also be tailored to suit other groups.

In addition to supporting sustainable forest management, Visy also supports sustainable agribusiness by contributing innovations in product packaging and related food waste reduction technologies across the supply chain. Visy's executive chairman addressed the Australia's Global Food Forum 2016 and announced that Australia should be aiming to grow total food exports - including processed and unprocessed - from the current AU\$39bn to AU\$100bn in seven years. Visy is investing heavily in technology and utilises technology for our customers. These include, for example, temperature controlled packaging for produce, dairy specialised in-mould label barrier systems and ultra lightweight beverage containers.

Implementation

Visy's Environmental Policy commitments are put into practice through the implementation of our HSE Management System Standards and Codes of Practice. These provide a consistent framework for the establishment of our HSE system across our operations. Visy's HSE Management System includes company-wide policies, procedures and processes that manage aspects of HSE.

Visy's business is built on finding innovative ways to turn waste into something valuable, which underpins our closed loop manufacturing business model. Some examples of this for 2015 include collecting and processing 1,717,739 tonnes of paper and cardboard and making 790,689 tonnes of recycled paper as well as similar amounts of kraft and board containing variable content of recycled fibre; and collecting and processing 43,061 tonnes of PET and HDPE plastics combined.

As one of Australasia's largest recycling companies, we continually drive improvements in the recycling industry. For example, our recycled plastics plant opened in 2012 uses FDA approved recycling processes to manufacture food grade recycled PET and HDPE. Our recycled food grade PET is suitable for use in packaging up to 100% composition for

applications such as water bottles. Our food grade HDPE is suitable for use in packaging up to 50% composition for applications such as milk and juice, which is a first for the Australian market. Visy is closing the loop locally to provide food grade recycled PET and HDPE sourced, produced and distributed in Australia.

Sustainability objectives underpin the design and operation of Visy's Tumut kraft mill, located in New South Wales (NSW), which has been in operation since 2001. Our total investment in this mill of over AU\$1 billion highlights our serious commitment to sustainability. The mill is among the lowest users of water of any similar mill in Australia and has near-zero levels of effluent leaving the site. A significant proportion of the energy used in the mill is energy generated on-site using renewable biomass fuels, such as bark and sawmill residues from the mill's operations. This has enabled the plant to satisfy over 70% of its total energy and over 40% of its electricity needs from on-site renewable generation.

Visy's investment in clean energy also includes an energy from waste plant opened in 2011 that uses previously landfilled waste from our paper recycling process as fuel to generate thermal and electrical energy to help power two of our recycled paper mills.

As a leading packaging manufacturer, Visy also contributes to improved environmental sustainability in consumable packaging through incremental improvements of packaging design, manufacture and functionality. For example, Visy's varied food packaging innovations have contributed improvements that range from the more obvious, such as increased recycled content and recyclability of packaging, to the less obvious such as reducing energy consumption of manufacture, increasing food shelf-life, reducing food waste and providing for more space-efficient packaging.

Measurement of outcomes

Visy is committed to reducing the energy used and the carbon footprint made by its manufacturing operations. Visy continues to monitor and review energy consumption across its sites.

Visy has consistently increased the amount of energy from renewable sources (including wood waste, black liquor from kraft paper production, biomass-paper waste, and biogas and biofuels, derived from production processes) over the past six years. In 2014-15 Visy produced approximately 50% of its energy needs from renewable sources.

Since 2008-09 Visy has reduced its greenhouse gas emissions per energy consumed by 18%. In 2014-15 Visy generated 995,103 GJ of electricity within its operations (an almost 5% increase on FY14) and through this reduced our use of electricity from the national grid.

Visy uses a number of alternative water sources i.e desalination and also recycled water. These alternative water sources have increased from 3.7% of total water consumption in FY09 to 16.5% of total water consumption in FY15.

Visy's environmental performance is tracked and measured for continuous improvement through our operations' KPIs as part of our HSE Management System. These include weekly inspection activity, incidents, complaints, toolbox talks and HSE Observations. Visy

measures waste to landfill, energy and water use and carbon emissions and uses this data to fulfil our annual reporting requirements in Australia.

Compliance is a key aspect of Visy's Environmental Policy and we conduct risk assessments of our sites to identify risks and actions to maintain compliance in all circumstances. Where an issue arises we proactively inform and work with state and local governments to resolve it promptly. Across our more than 100 Australian sites, in 2015/16 Visy received three environmental penalty notices; two for off-site odours emanating from a stockpile of glass at our NSW Recycling Facility which accumulated due to a lack of downstream processing capacity, and one for litter escaping beyond our boundary during high wind events. Visy took the required action to resolve and rectify these matters, with no further regulatory action.

Visy's energy committee tracks energy and waste performance indices across the company's manufacturing divisions and sites on a monthly and rolling annual basis. These include energy consumption for electricity and gas, landfill waste volume, avoided landfill volume via energy recovery at the company's three energy-from-waste plants, and carbon emissions. Visy reports on carbon emissions annually under the Commonwealth of Australian National Greenhouse and Energy Reporting Act.

Anti-Corruption

- **Principle 10** : Businesses should work against corruption in all its forms, including extortion and bribery

Visy supports the UN Convention against Corruption.

Our commitment to conducting our business in a professional, lawful and ethical manner is documented in our range of Legal policies.

These policies support our Code of Conduct by detailing our expectation that all Visy employees behave in a fair and legal manner and are seen to be doing so and must not engage in, be party to, or facilitate any bribery or corruption. Our Supplier Code of Conduct outlines similar expectations for our suppliers. The Visy Anti Bribery and Corruption Policy outlines Visy's expectations and requirements of all Visy employees, officers, agents, contractors, consultants, service providers, advisors and any other party acting on behalf of Visy.

Visy is committed to observing all applicable laws, regulations, codes and organisational standards in our business dealings. For our large Australian operations we have specific and mandatory ongoing training for Visy managers about our obligations under Australia's Competition and Consumer Laws.

Implementation

- Complaints Procedure

Visy's complaints procedure identifies that complaints or allegations of corrupt behaviour concerning Visy can be made to either Visy's Complaints Officer or to an independent external service provider. Responsibility for complaint handling and improper conduct rests with the Visy Legal Department and Head of Internal Audit. Responsibility for anti-bribery and corruption rests with Visy's Chief Executive Officer and Chief Financial Officer.

- Competition & Consumer Training

In Australia, all Visy managers are required to complete regular competition and consumer training. The training is designed to make sure managers understand the attributes and consequences of a range of corrupt behaviours under Australian laws such as price setting cartels, false representation and misuse of market power.

- External Whistleblower Service

Visy's External Whistleblower Service is managed by an external service provider to all of Visy's businesses (global). Disclosures can also be made securely through email, fax or postal mail. Protocols have been established to receive and protect information of these documents for privacy purposes.

Material supporting the above process is communicated to all employees, vendors, contractors etc through email, face to face awareness/training sessions and through "Helpline Cards" displayed in our operating sites and on our intranet/internet (for public) in policy form.

- Internal Complaints Handling Line

The Internal Complaints Handling Line is diverted directly to the Head of Internal Audit for general complaints. There is a separate policy to cover this with similar protocols to the External Whistleblower Service policy. All managers complete an annual Related Parties declaration to highlight any matters that require management where an employee has personal or family interests at our customer, supplier or competitor business.

Measurement of outcomes

- Record Keeping and Reporting

Each case received through the External Whistleblower Service, Internal Complaints Line and other sources are recorded by the Head of Internal Audit in a secure register. Reporting is provided in numerous forms including individual investigation reports, audit reports on the controls impacted, summary reporting on the investigations and outcomes for the Governance Board (Audit Committee) and the Compliance Committee (Trade Practices Committee) at least quarterly.

There have been no findings of incidences of direct bribery or corruption cases for the period 2015/2016.

- Face to Face Compliance Training

Externally facing staff are required to attend Face to Face Compliance Training as well as successfully completing a SALT online course.
