



UN Global Compact

Visy Communication
on Progress 2021



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Timing of this report

This report refers to events and progress made in financial year 1 July 2019 to 30 June 2020, unless otherwise stated. Subsequent to the fiscal year end, but before the reporting date, Visy acquired the shares of ACI Packaging Services Pty Ltd on 31 July 2020. This glass business was formerly owned by the Owens Illinois Group. This statement does not include glass making, now known as Visy Glass, but will be included in our next update. We have commenced integrating Visy's policy and practices for Visy Glass.

Statement of support from Visy's Chief Operating Officer

Operating across more than 120 sites in Australia, New Zealand and other parts of the world, Visy's more than 7,000 employees are guided by the company's vision to be the global leader in creating high quality, innovative and sustainable packaging solutions for a better world.

Sustainability sits at the centre of our operating model, driving strategic, long-term investments in plants, technologies and local jobs. We are committed advocates on some of the bigger issues that make a difference to our customers and communities, from pushing for more sustainable manufacturing approaches to creating better economic futures for regional communities.

As a signatory to the United Nations Global Compact (UNGC) since 2014, Visy reports progress annually on our performance against the 10 UNGC Principles, as well as supporting and contributing to the United Nations Sustainable Development Goals.

I am pleased to confirm that Visy reaffirms its support of the 10 UNGC Principles in the areas of Human Rights, Labour, Environment and Anti-corruption. In this, our sixth annual Communication on Progress, we describe our actions to continually improve the integration of the UNGC and its principles into our business strategy, culture and daily operations.

Our annual Communication on Progress is an important requirement of all companies participating in the UNGC, supporting public accountability and transparency. We also commit to sharing this information with other relevant stakeholders through our website and social media channels.

We are proud of the progress we continue to make in UNGC related areas, including supporting the circular economy, utilising increasing levels of renewable energy, and improving diversity across the business. Just as importantly, we are willing to continually learn, question and improve our performance.



Mark De Wit
Chief Operating Officer, Visy



Our vision is to be the global leader in creating sustainable packaging solutions
for a better world

Our values



CUSTOMER FOCUS

We will build strong relationships with our customers to support their business. When they succeed, so do we.



RELENTLESS PURSUIT OF BEST VALUE

We will be innovative in driving to achieve the best value for the supply chain.



SAFETY AND ENVIRONMENT

Everything we do is dependent on the safety of ourselves, our employees, our customers and the communities in which we operate. Sustainability is critical to our business.



ACTING WITH URGENCY, PASSION AND ENERGY

We have a strong work ethic and commitment to the success of “one Visy”. We act decisively, using facts, to achieve the best outcomes for our customers and for Visy. Our key people act with a strong sense of business leadership.



DEVELOPING EXCELLENCE IN PEOPLE

Core to our personal credibility is treating people with respect. We encourage everybody to be their best. Our people are supported and challenged to achieve their potential.

Human rights and labour

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

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

Our approach

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 towards each other, as well as towards our customers and suppliers, are detailed in our range of Health and Safety, Human Resources and Legal policies, and in our Code of Conduct and Supplier Code of Conduct. These policies address human rights issues, including our commitment to equal opportunity employment, our compliance with applicable wage laws and our positions against child labour, forced labour, vilification and occupational violence.

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 Responsible Sourcing Commitment - Fibre* and supported by Visy's Forest Stewardship Council (FSC) certification across all core fibre businesses (FSC-C008345).

As we continue to expand our business and broaden 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. As an active participant in the UNGC, Visy confirms this commitment as a key element of the continual growth and success of our operations.

Our progress

Responsible supply chains

We are committed to ensuring responsible, ethical and sustainable engagement with our supply chain partners of materials and services. We believe that a collaborative approach with our supply chain partners, service providers, and customers is key to a successful business.

Our Commitment to Responsible Supply Chains Policy, endorsed by Visy's Executive Chairman, Anthony Pratt, and Visy's Chief Operating Officer, Mark De Wit, supports this commitment.

Beyond our participation in the UNGC, we continue to be a progressive and collaborative member of the following social and environmental initiatives:

- FSC Australia
- Sedex
- UNGCA – United Nations Global Compact Australia
- Sustainable Agricultural Initiative Australia
- APCO – Australian Packaging Covenant Organisation
- ACOR – Australian Council of Recycling
- Ecovadis

Prior to engagement, supply chain partners we work with are requested to accept Visy's Supplier Code of Conduct. Every supply chain partner is also reviewed for risk factors, including modern slavery, through our licensed risk rating tool set. This is an ongoing review process.

In addition, for critical or high spend materials, a robust sourcing process is followed and plant audits may be conducted prior to, or following engagement, on an ongoing basis.

Where we identify other potential risks during a supply chain partner risk review, the supply chain partner is asked to provide statements on compliance to the relevant matter.

In 2019, in order to address potential modern slavery practices in our supply chain, the Visy executive team established a Modern Slavery Action Team and introduced a Supply Chain Risk Review Panel (SCRRP).

Both the Modern Slavery Action Team and the SCRRP have been authorised and mandated to monitor, assess, remediate and report on the potential for modern slavery risks in our operations and supply chains. In particular, the SCRRP has a formal charter outlining the functional requirements of Visy's supply chain risk assessment and provides updates to the Visy executive team.

The SCRRP is comprised of senior managers from Corporate Counsel, Group Commercial, Governance and Risk, Group Procurement and Operational Excellence. Additional positions are established to conduct individual assessments of each new supply chain partner before they are on-boarded as a supply chain partner, and to review existing supply chain partners used by Visy.

To support the SCRRP, we have licenced third-party software to assist in reviewing the supply chain. This tool reviews our supply chain partners by assessing each partner against a number of different risk indexes, including country, region and industry. In addition, the tool reviews any applicable global sanctions, convictions and high risks associated with the ownership and activities for each supply chain partner.

A set of criteria has been established to identify 'red flags' associated with each supply chain partner. These then require follow-up before sign off by the SCRRP, and before a supply chain partner can be engaged, or further trading commenced for existing supply chain partners.

As a result of this ongoing work and supply chain partner review process, decisions have been made to not engage several supply chain partners requested to be utilised in the Visy supply chain.

At home in local communities

While Visy's network spans the breadth of Australia, New Zealand and other parts of the region, our plants, warehouses and people are primarily part of the local communities in which we operate, with many in regional locations. We actively seek initiatives, and partner with like-minded organisations, to create positive change within these communities.

In the past year Visy and the Pratt Foundation, the philanthropic arm of the Pratt Family and Visy, continued support for key food rescue organisations, including providing practical, in-kind support for communities suffering from the effects of drought, bushfire and COVID-19. This support included provision of food hamper boxes and direct funding contributions to community organisations.



Case Study

As the COVID-19 pandemic unfolded during 2020, the Pratt Foundation and Visy joined Second Bite and Fare Share, two long-standing food rescue partners, to respond to the growing number of Victorians needing food relief.

The programs resulted in the delivery of 100,000 Cryovac pre-cooked frozen meals to a wide range of charities.

Case Study

Following the bushfires in early 2020 in the region surrounding Tumut, where Visy's Tumut kraft paper mill is located, the Pratt Foundation worked with the Foundation for Regional and Rural Renewal (FRRR) in administering the \$1 million Visy Tumut Region Recovery Fund.

The fund was designed to support the recovery of communities in the Snowy Valleys Council region, providing support in the form of grants to local not-for-profit organisations and community groups to deliver programs, services and activities to help local people.

The programs covered mental health and wellbeing, environmental and wildlife recovery, social connectedness and cultural vibrancy, community infrastructure and equipment.

The \$1 million donated by the Pratt Foundation to the recovery fund, was in addition to a further \$100,000 donated by the Pratt Foundation to ten local fire services.





Case Study

The Pratt Foundation is a long-term supporter of The Royal Children's Hospital (RCH). At the end of 2020, the Pratt Foundation donated 1,100 toys to RCH, in lieu of the annual Pratt Party for the Kids which was sadly unable to go ahead due to COVID-19 restrictions.

Patients, and their siblings, were delighted to receive the gifts which catered for age groups from newborns to teens, and included remote controlled cars, puzzles, showbags and soft toys. In 2021, the Pratt Foundation were again honoured to support The RCH Good Friday Appeal 2021 Teddy Bear Hospital. More than \$17 million was raised in this year's Good Friday Appeal, the 90th time the annual event has been held.



An active voice on big issues in the region

We continue to engage with stakeholders in seeking practical ways to reduce food waste in all supply chains, consistent with Sustainable Development Goal 12 ('ensure sustainable consumption and production patterns').

In 2020, Visy continued sponsorship of the Global Food Forum, an event designed to debate and progress the critical issues facing the region's \$150 billion agribusiness sector, including climate change and local food manufacturing. Visy sees its contribution to achieving these outcomes as a practical way to support sustainable development in the regions in which we operate.



A safe and healthy workplace

Visy employs over 7,000 people. Our workforce is predominantly based in Australia and New Zealand, with some employees based in Singapore, China, Thailand*, US, UK and Europe. (* Visy sold 80% of the Thailand-based business in August 2019, retaining 20% as an investor. Thailand-based employees are only relevant for two months of the FY2020 reporting period.)

We believe that all humans have a right to safety and we take our 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 a risk based Health, Safety and Environment (HSE) management system which, together with our Incident Management and Learning Management systems, create structure and consistency in the planning, implementation and management control of HSE issues. The Visy Safety Policy establishes long term objectives, while the HSE Plan sets two year targets.

All Visy sites are required to develop safety and environmental hazard registers to identify risks, determine the necessary controls to manage the risks, and to assure those controls are in place and working. All sites are audited internally on an annual basis and rated on a traffic light system. Site safety data is reported monthly to the Visy Executive covering hazard identification, action completion and injury results.

In FY2020 Visy's recordable injury rate reduced by 18% compared to the previous year, and the lost time injury frequency rate reduced by 14%. Over the past five years, our lost time injury and total recordable injury rates have reduced by 50% and 41% respectively.

Awareness around mental health issues remains a key workplace initiative. We have continued our mental health awareness program for all Front Line leaders, which commenced in 2018, with more than 200 leaders completing the 'Building a Mentally Healthy Workforce' program.

Case Study

Visy sites and teams marked RUOK? Day in September 2020 with a focus on positive mental health more important than ever.

Despite many sites not being able to hold traditional events that gather groups of employees together due to COVID-19 restrictions, important conversations were still the order of the day.

The aim of RUOK? Day is to remind everyone about the importance of asking 'Are you ok?' in order to meaningfully connect with others and support anyone struggling with life.



COVID-19 introduced additional health and wellbeing challenges to the workforce. In addition to strict hygiene and health protocols in line with government guidelines, during 2020 we rolled out a series of campaigns specifically tackling mental challenges around COVID-19 including fatigue, anxiety and COVID-19 complacency. Further skill building workshops continued throughout 2020, focusing on resilience during the COVID-19 pandemic.

In 2021, we ran a 'Leading a Mentally Healthy and Thriving Workforce: Transitioning out of COVID-19' program to support leaders to help their teams transition out of COVID-19.

Case Study

In 2020, the Pratt Foundation announced a donation of \$1 million to the Peter Doherty Institute for Infection and Immunity at the University of Melbourne, to be used in a trial of existing HIV and arthritis drugs in the potential treatment of COVID-19.

The trial involved 2,440 people over 60 days in 60 hospitals across Australia and New Zealand.



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 reviews and disciplinary actions.

People policies, including Child & Forced Labour, Workplace Harassment and Bullying, Parental Leave and Code of Conduct were reviewed and refreshed in February 2018. Visy's Leave Policy was updated in August 2018 to include the option for Purchased Annual Leave. In addition, the Domestic Violence Victim Support Policy was introduced in 2019.

Visy's Employee Assistance Program (EAP) offers free and confidential counselling to all our employees and immediate family members, as well as online support and resources.

An engaged workforce

At Visy, one of our key values is 'Developing Excellence in People'. We know that in order to create a bright future for our business, we need to invest in our people, reward and recognise their efforts, and ensure we are developing our future talent pipeline. We have developed an Attraction, Retention and Engagement Strategy to ensure we remain focused on attracting and engaging the talent we need, now and into the future.

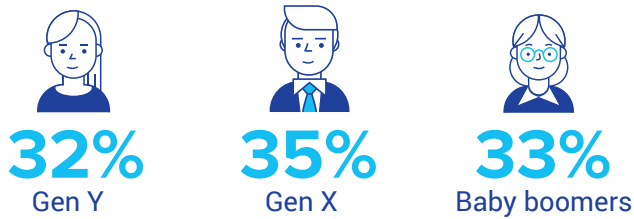
Our range of development and training programs show our commitment to not only developing talented people but also ensuring all our employees understand our expectations as a company and their obligations in workplace behaviour.

In FY2020 we offered a wide range of development and training opportunities covering leadership, business, compliance and personal development. Courses were offered in person where possible, and also through virtual and online delivery methods.

Encouraging diversity

We believe equal opportunity makes for a better world and we take pride in building upon our diverse and inclusive culture. Appreciating different perspectives, experiences and approaches – irrespective of age, race, gender or department – fuels creativity and helps people bring their best to work.

Visy's workforce is spread fairly evenly by age, with



We have an action plan in place focused on advancing women at Visy. This plan includes a variety of initiatives including consultation with both women and men through national workshops to understand the barriers and enablers to advancing women at Visy. Since 2018, we have run an Executive Mentoring Program, involving mentoring relationships between high potential women and senior leaders of the company. Interest in the mentoring program is high, with the last intake fully subscribed.

Our Visy Circle In Portal, launched in 2019, provides valuable resources, coaching, support tools and tips to our working parents group, supporting our employees commencing a family, taking parental leave, returning to work, or managing work and family. The platform continues to gain participation and interest as the content is increasingly expanded and enriched.

Case Study

Visy Logistics' inaugural in-house Female Driver Trainee Program launched in 2020. Successful applicants participated in a fully-paid, four-week intensive driver training course in January 2021 to obtain a Heavy Rigid Licence.

Graduates of the course are now employed within the Visy Logistics' team in Melbourne. This program supports our attraction strategy and our commitment to lifting female representation across the business.



Environment

Principle 7:

Businesses should support a precautionary approach to environmental challenges

Principle 8:

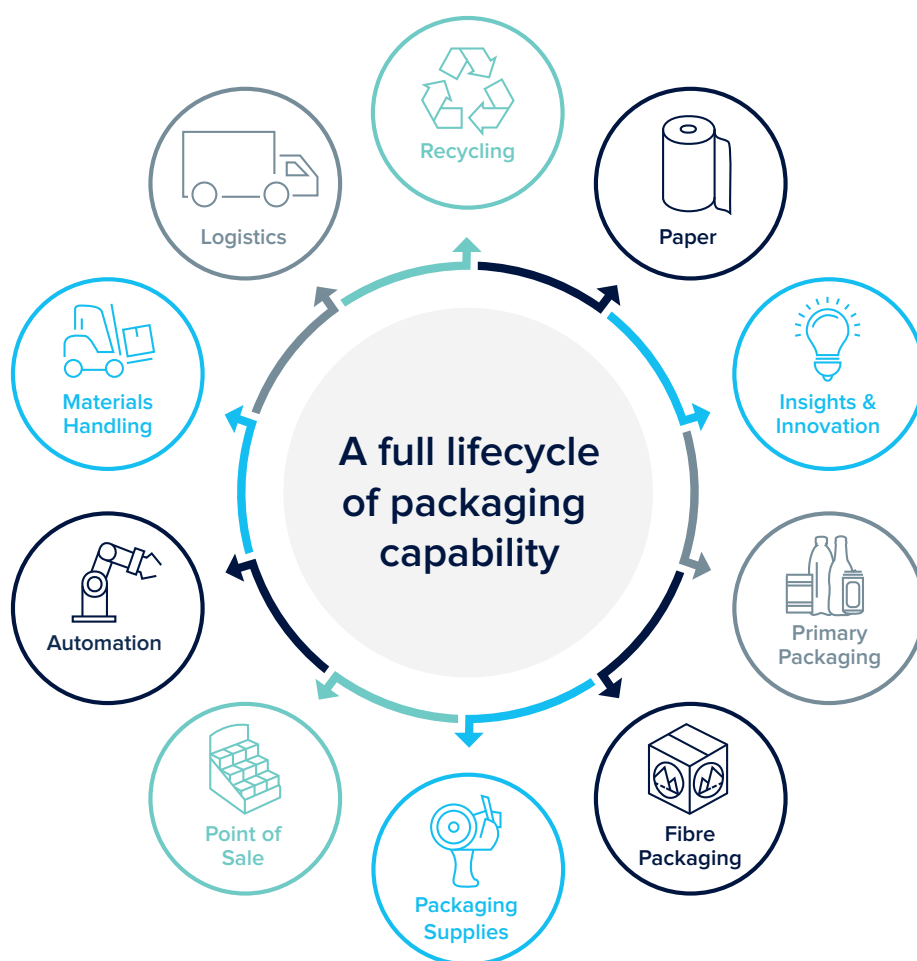
Undertake initiatives to promote greater environmental responsibility

Principle 9:

Encourage the development and diffusion of environmentally friendly technologies

Our approach

Visy is a global leader in packaging and resource recovery, and has been a pioneer in sustainability since our inception. Our innovation, manufacturing and logistic capabilities are organised around an integrated closed loop, offering our customers a full lifecycle of packaging capability.



Our progress

Our unique circular economy model

Visy's unique business model is built on identifying innovative ways of turning waste into value. This philosophy underpins our circular economy model.



Our vision is to be the global leader in creating sustainable packaging solutions for a better world. Our unique, closed loop manufacturing processes link recycling and manufacturing, making a significant contribution to the circular economy and to sustainable patterns of consumption and production.

For example, in FY2020 we processed 1.56 million tonnes of paper and cardboard from kerbside and commercial recycling. Over the same time period we produced 662,000 tonnes of kraft paper, 826,000 tonnes of recycled paper and 882,000 tonnes of fibre packaging.

We make it (FY2020)

KRAFT PAPER 662K TONNES	RECYCLED PAPER 826K TONNES	BOARD 882K TONNES	FOOD CANS 553M	BEVERAGE CANS 1.9B	GLASS 856K TONNES	PLASTIC CONTAINERS 994M	PLASTIC PREFORMS 970M
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We take it* (FY2020)

PAPER & CARDBOARD 1.56M TONNES	GLASS 409K TONNES	PET 30K TONNES	HDPE 11K TONNES	OTHER PLASTICS 59K TONNES	ALUMINIUM 20K TONNES	STEEL 31K TONNES
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*Includes recyclable materials used by Visy and provided to other recyclers.

Source: Visy Blue Book FY2020 Materials Reporting

Case Study

As one of the region'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 for applications such as water bottles, while our recycled food grade HDPE is suitable for use in packaging 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.



We continue to work with government and industry to increase the regions' capabilities in re-manufacturing and recycling, in line with government focus areas and recent legislation prohibiting the export of specific unprocessed materials collected for recycling.

As a leading packaging manufacturer, Visy also contributes to improved environmental sustainability in consumable packaging through incremental improvements of packaging design, manufacture and functionality. 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.

Environmental management

Our commitment to sustainable development means we take a whole of product lifecycle approach to ensure our activities, products and services enhance the environment in the communities in which we operate. 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 Management System across our operations. Visy's HSE Management System includes company-wide policies, procedures and processes that manage aspects of HSE.

Visy currently holds 32 environmental licences, as well as trade waste agreements for discharges of industrial liquid waste to sewer. 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 120 Australian and New Zealand sites, there were no environmental penalties issued to Visy in FY2020.

Our sites work to an environmental management system based on the structure of the International EMS standard ISO 14001. This 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 Forest Stewardship Council (FSC C-008345) Australia and the Australian Forest Products Association (AFPA). Our current FSC and the Programme for the Endorsement of Forestry Certifications (PEFC) certificates cover more than 70 sites certified across five different countries.

Our Visy Responsible Sourcing Commitment – Fibre, details our processes for ensuring our fibre sources are certified against the relevant accredited standards and support sustainable forest management by sourcing wood fibre from suppliers that are economically viable, environmentally responsible and socially beneficial. We conduct annual reviews of all wood suppliers supplying fibre used in our production.

Find out more at visy.com.au/responsible-business

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 is a major sponsor of the Global Food Forum (see page 8 for further details) and we are investing heavily in technology improvements for our food customers including, for example, temperature controlled packaging for produce, dairy specialised in-mould label barrier systems and ultra lightweight beverage containers.



Further reporting and ratings

Visy's environmental performance is tracked and measured for continuous improvement through our operational KPIs as a component of our Visy Integrated Management System. Environmental targets are included in the Safety and Environmental Sustainability Plan. Operational performance targets 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, Visy is required to report to the National Pollution Inventory (NPI), National Greenhouse and Energy Reporting Act (NGER), and The Australian Packaging Covenant Organisation (APCO). We are also required to submit annual returns for our licensed sites to the respective state authorities.

Visy engages with Ecovadis to measure our environmental position based upon a scoring system allowing benchmarking against other global companies. Our 2019 CSR assessment places Visy as 'silver' in the 85% percentile as evaluated by Ecovadis. We will engage Ecovadis to remeasure our environmental position in 2021.



Energy usage

We are committed to reducing the energy used, and the carbon footprint made, by our manufacturing operations. We continue to monitor and review energy consumption across our sites.

Visy's energy and waste committees set targets and performance indices on a monthly and rolling annual basis 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 reports on carbon emissions annually under the Commonwealth of Australian National Greenhouse and Energy Reporting Act.

Over the past five years we have consistently increased the amount of energy produced from renewable sources,

including wood waste, black liquor from kraft paper production, biomass-paper waste, and bio-gas and bio-fuels derived from production processes and solar. In FY2020 approximately 100,000 tonnes of landfill were diverted to energy production at Visy.

Effective 1 January 2020, Visy has entered into a long-term purchasing agreement with the Lal Lal wind farm to support the development of renewable energy infrastructure in Victoria.

We have also completed a 1,920 kW roof-top solar installation at the Gepps Cross site with funding support from the South Australian Government. The project generates 40% of the site's electricity needs.

Since FY2018 Visy has generated the equivalent of approximately 50% of its energy needs from renewable sources. Since FY2009 Visy has reduced its greenhouse gas emissions per unit energy by 31.3%.

Case Study

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 A\$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 generated on-site using responsibly sourced renewable biomass fuels, such as bark and wood residues from the mill's operations. This has enabled the plant to satisfy over 80% of its total energy 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. These initiatives have resulted in reduced landfill of waste materials from Visy's manufacturing operations as well as reductions in greenhouse gas emissions from the disposal of waste to landfill and from the reduced use of natural gas and grid electricity.



Water usage

We continue to monitor and review water consumption across our sites in line with our commitment to use natural resources responsibly.

Visy uses a number of alternative water sources, including desalination and recycled water. More than 20% of our water requirements are obtained from recycled and desalinated sources.

These alternative water sources have increased from 3.8% of total water consumption in FY09 to 23.5% of total water consumption in FY2019, reducing our use of fresh water sources.

Increasing education around environmental issues

Visy offers a range of programs and support to councils and businesses with the aim of improving community and business knowledge and attitudes towards waste minimisation, increasing levels of local recycling, and driving demand for recycled packaging. Activities offered include Material Recovery Facility (MRF) tours, speaking engagements on recycling topics to residents, and the provision of educational materials such as flyers, social media content, community paper and bus shelter advertising and PDF downloads for councils and businesses to use locally.

Visy continues to partner with Cool Australia, a not-for-profit organisation that provides educational curriculum in environmental, social and economic sustainability from early learning to secondary school. Visy has worked with Cool Australia to develop a range of over 30 sets of teacher resources which relate to Visy's resource recovery operations, in particular, recycling and the circular economy.

Case Study

With the challenges presented by COVID-19, Visy partnered with Wyndham City Council in 2020 to trial an online education session on recycling.

Targeted at residents, the live webinar covered what can and cannot be recycled, explained what happens to the contents of the kerbside recycling bins once collected, and provided community members with direct access to ask questions to a representative from Visy Recycling.

The learnings from this online pilot are being extended to ongoing web based sessions. Visy also continued to produce printed copies of 20-page kids' activities book to support in-home engagement and education on everyday recycling topics.



Anti-corruption

Principle 10:

Businesses should work against corruption in all its forms, including extortion and bribery

Our approach

Visy supports the UN Convention against Corruption

Visy is committed to conducting business in an ethical, honest way and without the use of bribery or other corrupt practices to obtain an advantage. Visy's Anti Bribery and Corruption Policy is in place across all jurisdictions in which we operate and works alongside other relevant Visy policies including, without limitation, the Employee Code of Conduct and Supplier Code of Conduct.



Our progress

Visy's Anti Bribery and Corruption Policy outlines the expectations and requirements of all Visy employees, officers, agents, contractors, consultants, service providers, advisors and any other party acting on behalf of Visy.

Internally the policy supports our Code of Conduct, including our expectation that all Visy employees behave in a fair and legal manner and are seen to be doing so. This policy is required to be read and acknowledged on an annual basis by all monthly paid employees and those in roles with direct links to customers and suppliers through our related party declaration process. Visy's employees, contractors and consultants are responsible for ensuring that their behaviour and actions comply with the Code of Conduct at all times.

Visy's comprehensive compliance program provides online and face-to-face training and information to relevant employees about their obligations under the law.

All managers complete an annual Related Parties declaration to highlight any matters that require management attention where an employee may have personal or family interests at a customer, supplier or competitor business.

Visy's Commitment to Responsible Supply Chains addresses corruption and business ethics. In addition, during 2020, new processes were established using external software to assess corruption risk as part of the vendor on-boarding process.

This process considers the country of operation of all suppliers, and any enforcement that have been received by the potential vendor. A diverse internal panel, the Supply Chain Risk Review Panel, has been established to support this to review vendors with an unacceptable risk score. Read more about this on page 6.

Formal processes exist and continue to be improved for assessing cyber security risk and identifying and blocking external attacks to protect our systems and data. This includes personal data covered under the Privacy Act.

Ernst & Young, Protiviti and other external specialist companies continue to provide internal and external audit outsource support to review our frameworks for managing general risk, fraud, theft and improper conduct risk. This includes the risk of bribery and corruption. These reviews cover IT security relating to cyber threat, physical security and compliance with privacy legislation.

External Whistleblower Service

Visy's External Whistleblower Service is managed by an external service provider for all of Visy's businesses globally. 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.

Training is provided on this subject to employees in a number of forms including face-to-face, video and through use of signage and communications at all our operating sites and offices.

Record keeping and reporting

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

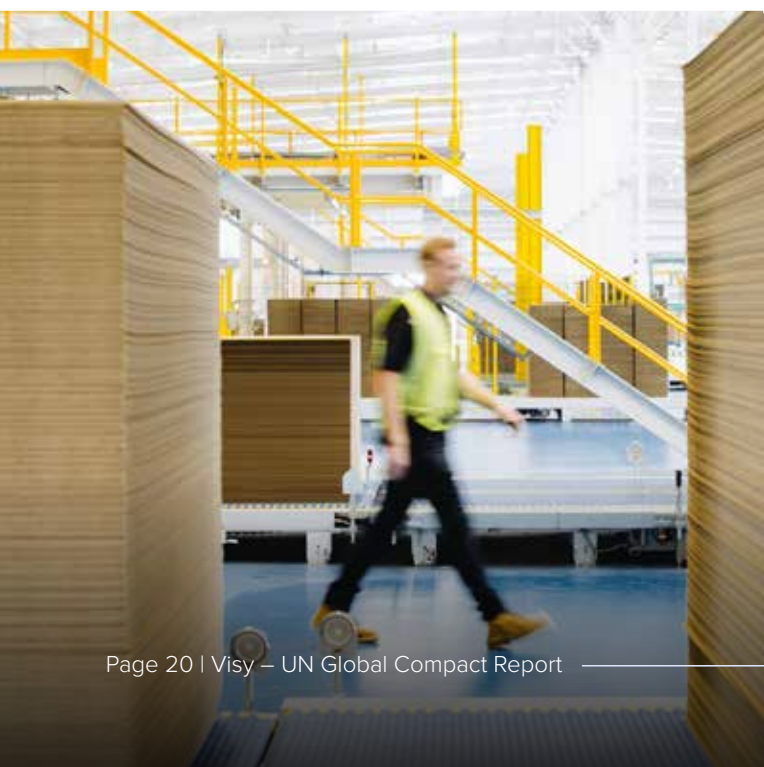
There have been no findings of incidences of direct bribery or corruption cases for the financial period FY2020.

Complaints Management Policy

Our Complaints Management Policy and related procedure is in place to deal with all general complaints not pertaining to theft and fraud. It offers a free call complaints line to raise issues of concern. Details are published on our website for the general public and on our intranet for employees.

Competition and consumer law training

In Australia and New Zealand, relevant Visy employees are required to complete comprehensive competition and consumer law training. The training is designed to inform Visy employees of the provisions of the laws and their impact on our business, and the need to act in accordance with their obligations under competition and consumer laws.





FOR A BETTER WORLD

visy.com