

## Human Rights Policy

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### Purpose and scope

Human rights are the fundamental rights, freedoms and dignities every person is entitled to, regardless of gender, race, nationality, religion, sexual orientation or other status.

Visy, through this Human Rights Policy, is committed to respecting human rights and ensuring respect and equality for our customers, employees, communities and suppliers.

Visy's Executive Leadership Team and our business divisions are responsible for the management of human rights within each business area. This includes ensuring compliance with this Policy.

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### Document owner

Sustainability, Corporate, Level 11, 2 Southbank Boulevard, Southbank, Vic, 3006.

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### Review date

06 June 2024

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### Who does this Policy apply to?

This Policy applies to the Visy Group and its Directors, officers, employees and contractors, including suppliers of goods and services.

We expect all Visy people, contractors, suppliers and anyone working on behalf of Visy to:

- Consider the human rights implications of your actions and decisions;
- Report any human rights concerns and complaints to your HR Business Partner, Sustainability Business Partner or use the Whistleblowing Service; and
- If you are a supplier to Visy, uphold our commitment to human rights and comply with this Policy (as well as Visy's Supplier Code of Conduct).

## Policy

### Our Commitment

Visy is committed to supporting human rights in our operations and our supply chain. We commit to applying the principles outlined in this Policy and expect our suppliers and contractors to uphold the same standards.

### Our Principles

- Respecting and following the guidelines specified by the United Nations Universal Declaration of Human Rights, and the ten principles of the United Nations Global Compact.
- Complying with local laws wherever we operate. Where local laws differ from Visy's human rights commitments, we follow the higher standard. Where these commitments are in conflict with local laws, Visy will comply with local laws while striving to give effect to our human rights commitments to the extent possible.
- Providing fair, healthy and safe working conditions for our employees that are free from discrimination, harassment and bullying.<sup>1 2 3</sup>
- Providing a culture that fosters diversity and inclusion; where everyone is treated fairly, with respect and dignity, including our employees, suppliers, customers, and other stakeholders.<sup>4</sup>
- Not tolerating or supporting the use of child labour (the minimum age for employment being the higher of 15 years of age or the minimum age for employment in the relevant country), forced labour or any other form of modern slavery.
- Respecting the right to collectively bargain, of freedom of association, privacy, and a clean, healthy and sustainable environment.<sup>2 5</sup>
- Avoiding bribery, fraud, corruption or any other unethical behaviour in all their forms.<sup>5 6</sup>
- Ensuring that we maintain grievance mechanisms that allow for the reporting of human rights concerns.<sup>7 8</sup>
- Monitoring and managing the effectiveness of our policies and the performance of our suppliers via a due diligence process.

### Breach of this policy

Breaches of this Policy may result in disciplinary action, up to and including termination of employment.

Breaches of this Policy by contractors and suppliers to Visy may result in remedial action, including termination of business relationships and notification to relevant authorities depending on the nature of the breach.

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<sup>1</sup> Workplace Harassment and Bullying Policy

<sup>2</sup> Safety Policy

<sup>3</sup> Domestic Violence Victim Support Policy

<sup>4</sup> Diversity and Inclusion Policy

<sup>5</sup> Code of Conduct

<sup>6</sup> Supplier Code of Conduct

<sup>7</sup> Whistleblower and Improper Conduct Policy

<sup>8</sup> Complaints Handling Policy