

## Corporate Ethics and Feedback Policy

---

### Purpose and Scope

The purpose of the policy is to outline Visy's requirements in relation to ethics and feedback.

---

### Document owner

Head of Internal Audit and Risk Management

---

### Review date

1<sup>st</sup> March 2027

---

## Policy

### Corporate Ethics

Visy recognises the importance of honesty, integrity and fairness in conducting its business, and is committed to achieving its strategy in conjunction with fulfilling its responsibilities as a good corporate citizen. All employees, contractors, and directors are expected to act with integrity and objectivity, striving at all times to enhance the reputation and performance of Visy.

Visy also recognises that through the ordinary course of business employees, contractors, and directors may deal with vulnerable persons and wishes to ensure that the same level of integrity and fairness is shown to these parties.

These core principles, which the Executive and senior management are committed to upholding are outlined in Visy's Code of Conduct Policy which is published in the Corporate Governance section of the Company's website.

### Feedback & Complaints

Visy is committed to handling feedback, originated both internally and externally, in a clearly defined, effective and in an expeditious manner.

Visy fosters a culture that:

- treats customers, employees, suppliers and contractors with respect by acknowledging their right to complain and have a complaint handled professionally;
- actively solicits and acts on employee, customer, supplier and contractor feedback; and
- acknowledges that feedback received gives Visy an opportunity to maintain confidence in our brand.

### **Application of this policy**

Any person or organisation who has any feedback is invited to lodge this feedback with Visy, the information from which shall be dealt with in accordance with this Ethics and Feedback Policy.

This policy does not apply to feedback relating to wrongdoings (e.g. theft, fraud and improper conduct), which is covered by Visy's Whistleblower policy.

Matters raised relating to an individual site or at divisional level should first be raised through the appropriate site and divisional communication channels.

Through the [visy.com](https://visy.com) website, Visy has established an online form which can be used for this purpose. This can be accessed via the following link: [Visy Enquiry | Visy](#).

Visy is committed to the principles embodied in the Australian Standard for complaints handling.

Remember – handling feedback of all types, including complaints, is everyone's job. Everyone working within Visy must understand this Ethics and Feedback Policy.

### **Feedback Handling process**

Feedback, including complaints other than wrongdoings (outlined in the Whistleblower Policy), can be made via a number of channels, including:

- the relevant Visy divisional manager;
- by phone on 1300 855 448 (internal number);
- via the website: [visy.com](https://visy.com), (enquiry form under the 'tab, 'ContactUs');
- via Visy's independent Whistleblower line (can remain anonymous)
  - on 1300 304 550 (Australia) or +61 3 9811 3275 (outside Australia) or
  - [visy@stopline.com.au](mailto:visy@stopline.com.au) (email)
  - [www.visy.stoplinereport.com](https://www.visy.stoplinereport.com) (web form)
- in writing to the Ethics & Feedback Officer, Visy Level 11/2 Southbank Boulevard Southbank, Melbourne Victoria 3006

### **Complaints**

The complaints resolution process outlined below should be followed for all applicable complaints. The person who first receives the complaint will:

- immediately acknowledge the complaint (either during the phone call from the complainant or by email);

- record the complaint in a Complaints Register and assign the complaint a unique identification number;
- if necessary, retain a file on the complaint;
- gather sufficient detail about the complaint in order to properly investigate and respond (e.g. information about an incident or product, timing, persons or companies involved). This information must be recorded in the Complaints Register;
- if the receiving officer is able to resolve the issue on the spot, do so and record how the matter was resolved and change the status of the matter in the Complaints Register to 'closed'. If the person who first receives the complaint is not able to resolve the complaint within 30 business days, they must escalate the complaint to their manager or to the relevant business division.
- where the matter relates to a product or service or technical issue that they cannot resolve, transfer the complainant to the relevant business division and note this step in the Complaints Register. The representative at the relevant business division must take steps to resolve the complaint. If the complaint cannot be resolved by that representative within 30 business days, the complaint must be escalated to the relevant divisional manager.

A complaint escalated to Management must be resolved within a further 30 days or a longer period agreed with the complainant. If the Manager cannot resolve the complaint within the further 30 days or period agreed with the complainant, they must escalate the complaint to the relevant Executive General Manager and notify the Visy Legal Department.

If the relevant Executive General Manager cannot resolve the complaint within a further 15 days, or a longer period agreed with the complainant, the complaint must be escalated to the Chief Executive Officer.

Each escalation step must be recorded in the Complaints Register.

If, at any point, a complainant threatens legal proceedings, a regulator is involved or is likely to become involved, the Visy Legal Department must be advised.

The Complaints Officer will regularly check the Complaints Register to ensure matters are promptly escalated when they cannot be resolved and involve the Visy Legal Department where the Complaints Officer considers it appropriate to do so.

## **Feedback**

All feedback, positive and negative will be forwarded to the relevant Visy division.

## **Solutions & Remedies**

A number of remedies are available to address complaints which reflect good industry practice, are fair and reasonable in the particular circumstances, and meet Visy's legal obligations.

Possible options include, but are not limited to:

- refund or replacement of a product or service;
- information, explanation or technical assistance;
- an apology; or
- compensation.

The appropriate options must be discussed with the Visy representative managing the complaint.

### **What if Visy is not at fault?**

If, after a careful investigation, it is determined that Visy is not at fault or liable, a carefully worded letter will be sent to the complainant explaining this finding. This letter must be approved by the Visy Legal Department.

### **What if the complaint is not resolved to the complainant's satisfaction?**

If the complainant rejects Visy's proposed decision/action, the complaint should remain open in the Complaints Register. This should be recorded and the complainant informed of alternate forms of external recourse available. Again, the person who receives the complaint or the Visy representative dealing with the complaint at the time must speak with the Complaints Officer prior to taking this step.

## **Communication & recording**

All complaints must be recorded in the Complaints Register by the person who receives the complaint. If a matter is escalated, the person to whom the matter is escalated must ensure that the Register is maintained and updated.

## **Related Documents**

- Visy Employee Code of Conduct Policy
- Visy Supplier Code of Conduct Policy
- Visy Whistleblower Policy
- Visy Corrective Action & Disciplinary Policy