

## COMPETITION AND CONSUMER LAW COMPLIANCE POLICY

### PURPOSE & SCOPE

This document sets out Visy's requirements in relation to Competition and Consumer Law Compliance.

### DOCUMENT OWNER

This document is owned by the Visy Legal Department. Any queries should be discussed with the Visy Legal Department.

### REVIEW DATE

This Policy will be reviewed annually.

### POLICY

Visy is committed to observing all laws, regulations, codes and organisational standards including, in particular, the provisions of the Australian Competition and Consumer Act (**CCA**) and Australian State consumer protection legislation and the New Zealand *Commerce Act 1986* (**Commerce Act**), the *Fair Trading Act 1986* (**FTA**) and the *Consumer Guarantees Act 1993* (**CGA**), collectively, the Competition and Consumer Laws.

The Competition and Consumer Laws apply to all of the business activities of Visy — this includes Visy's business dealings with customers, suppliers, competitors and members of the public. It is therefore critical that everyone working at Visy, whether employees or contractors, understands the provisions of the Competition and Consumer Laws and their impact on our business, and acts in accordance with their obligations under the Competition and Consumer Laws.

#### Our Compliance Program

As part of our commitment, Visy has a Competition & Consumer Law Compliance Committee who will continue to oversee the implementation of the company-wide Competition and Consumer Law Compliance Program (**Compliance Program**) in accordance with the Australian Standard on Compliance Programs.

The Compliance Program involves:

- the ongoing training of all Visy employees as to their obligations under the Competition and Consumer Laws and the impact of the Competition and Consumer Laws on their individual areas of responsibility and the testing of the employees' understanding of their obligations;
- the preparation of on-line Australian and New Zealand Visy Competition and Consumer Laws Compliance reference material as part of on-line training and testing program;
- Visy's Whistleblower and Improper Conduct Policy and Procedure;
- Visy's Complaints Handling Policy and Procedure; and
- the preparation of additional policies and processes to document the way in which Visy responds to its customers and stakeholders.

The Visy Competition and Consumer Law Compliance Committee reports directly to the Visy Governance Board. The Committee's mandate is to ensure adequate resources are devoted to continuous improvement and review of the compliance performance of Visy.

In this way, Visy and its employees aim to reduce the risk of breaching the Competition and Consumer Laws and of incurring penalties and fines and other actions, as well as the loss of the goodwill of the company in the marketplace that can result from breaches of the Competition and Consumer Laws.

Visy will make every effort to ensure that each of its officers and employees receive training and become involved with the Compliance Program. The aim of these efforts is to ensure that there is an informed and dedicated commitment to compliance with the Competition and Consumer Laws throughout the business.

### Your responsibility

It is the responsibility of each and every employee of Visy to ensure that they do not personally engage in, or allow or ignore any behaviour by others that may contravene the provisions of the Competition and Consumer Laws. A breach of the Competition and Consumer Laws has serious consequences for Visy and you (if you are involved in the breach). Breaches of the Competition and Consumer Laws will be viewed by Visy as a serious contravention of the terms of your employment and will result in disciplinary action including summary dismissal. Any employee of Visy that is knowingly or recklessly concerned in a breach of the Competition and Consumer Laws will not be indemnified by Visy.

Visy expects you to be familiar with your obligations under the Competition and Consumer Laws, and when in doubt, to raise any queries you may have with Visy's Legal Department before taking any action.

Visy also encourages you, under the Visy's Whistleblower and Improper Conduct Policy and Procedure, to report any conduct that you suspect may be a breach of the Competition and Consumer Laws or is otherwise improper or a breach of the Visy Code of Conduct. Visy encourages you to make such reports whether you do so publicly or anonymously.

Visy will seek to ensure that employees can raise their concerns without fear of victimisation and in the knowledge that their concerns will be addressed. Visy will take all reasonable measures to protect individuals against any detrimental actions which may arise as a consequence of disclosing information relating to suspected improper conduct.



**Anthony Pratt**  
Executive Chairman



**Brian McPheely**  
Global Chief Executive Officer