



# VANTIVA AUSTRALIA – MODERN SLAVERY STATEMENT

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## INTRODUCTION

Vantiva is a global technology leader in designing, developing, and supplying innovative products and solutions that connect consumers around the world to content and services. Vantiva optimizes supply chain performance in high-precision manufacturing, logistics, fulfillment, and distribution. With operations throughout the Americas, Asia Pacific and EMEA, Vantiva is recognized as a strategic partner across various vertical industries, including network service providers, software companies as well as providing packaging and optical disc media for home entertainment.

The Vantiva Australian Group operations are known as:

- **Technicolor Pty Ltd**, which owns 2 subsidiaries:
  - Technicolor Distribution Australia Pty Ltd
  - Vantiva Technologies Australia Pty Ltd

This statement is intended to meet compliance requirements of Section 13 of the Modern Slavery Act 2018, and describes the steps taken by Technicolor Pty Ltd ACN 000 978 343 and controlled entities listed above to minimize the risk of modern slavery occurring in our business and our supply chains.

Note: Technicolor Distribution Australia Pty Ltd is currently dormant.

## OPERATIONS

- **Technicolor Pty Ltd**– provision and packaging of optical disc media (DVD, CD, Blu-Ray) and games for our clients. Authored digital content is provided to us by our clients which is processed and used to manufacture finished optical disc media. Optical discs and games cartridges are sourced from Vantiva group companies and customers. Optical discs are packed in our Sydney site. Packaging involves assembly of discs into cases with printed paper parts and other components as required by our customers. A majority of the packaging materials are sourced from the Australian market, with some supplied by customers. Clients arrange for collection of finished goods and delivery to destination. The workforce consists of approximately 68 full-time employees and utilizes casual labor in the packaging operations as necessary.

- **Technicolor Distribution Australia Pty Ltd** – currently dormant
- **Vantiva Technologies Australia Pty Ltd** – VTA design, develop and supply innovative products and solutions specific to our customer's CPE requirements for the Australian Market. This includes Hybrid, Non-Hybrid and 5G FWA devices and set top boxes. These devices are delivered to customer warehouses as specified. The local team also provides software maintenance in-line with customer requirements. The workforce consists of approximately 12 full time employees and does not utilize casual labor in their operations.

## SUPPLY CHAINS

Supply chain relationships for all Australian entities include suppliers from the following sectors:

- Optical Media (Discs – DVD's / CD's / Blu-Rays) manufactured in overseas Vantiva Group Companies in Mexico and Poland. Key materials sourced from various countries. Key suppliers fall within the Vantiva Group Supplier Responsibility Program.
- Electronics components, materials and product development sourced from Vantiva entities based in Belgium, US and France. Key materials sourced from various countries. Key suppliers fall within the Vantiva Group Supplier Responsibility Program.
- Packaging materials – majority sourced from local Australian suppliers and smaller proportion are supplied by our customers.
- Customer supplied components which include items such as games cartridges.
- Office consumables sourced from local suppliers.
- Onsite Casual labor is sourced through Australian labor hire companies.
- Facilities – including cleaning, utilities, Security and Waste Management are sourced from local suppliers.
- Business process offshoring – certain finance functions.

## RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

As a global corporate citizen, Vantiva is committed to fulfilling its social responsibilities. Every business that Vantiva engages with must demonstrate the highest standards of business conduct and must comply with all laws and regulations. This commitment is unwavering and extends to our supplier's sub-contractors and service providers.

As such Vantiva has implemented the Supplier Responsibility Program which creates the standards required for conducting business with Vantiva. Our goal is to work with suppliers, sub-contractors, and service providers to ensure full compliance-in-practice with our identified guiding principles. The suppliers, sub-contractors, and service providers must in turn apply these principles to their own suppliers that work in the delivery of goods and services for Vantiva.

As part of the Supplier Responsibility Program Vantiva performs a periodic risk assessment of all suppliers, using a variety of tools and methods. The critical variables used to make the risk assessment depends on the annual spend amount with each Supplier, the existence of and recency of any past Supplier assessment, and the geographical risk associated with the Suppliers locations (country risk). The risk of modern slavery from our local Australian suppliers is considered low. However, although no known instances of Modern Slavery have been found in our supply chain, we do not exclude the potential risks in particular geographical locations where some of our key materials are sourced.

## VANTIVA POLICIES & ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

### Internal Policies

Vantiva has established policies which prohibit the use of forced labor, child labor, human trafficking and slavery. These policies apply to all Vantiva sites and subsidiaries. We require key direct material suppliers to comply with our policies against forced labor, child labor, human trafficking and slavery within the supply chain.

Since 2003, Vantiva (formerly Technicolor) has been a participating company in the UN Global Compact – and is therefore committed to respecting and promoting the core principles.

Vantiva maintains internal accountability for employees to meet company standards regarding slavery and human trafficking and provides employees and management who have direct responsibility for supply chain management, training on human trafficking and slavery within the supply chain of products.

Vantiva also operates a Group Whistleblower Policy which offers anonymous reporting of any unethical conduct, including any modern slavery violations. Any reports are fully investigated and handled sensitively. If any remediation is needed which involves a supplier relationship, Vantiva will work with the supplier to reinforce our standards.

### **Supplier Responsibility Program**

As mentioned above, Vantiva has established the Supplier Responsibility Program which has outlined key principles and has detailed expected standards and policies.

Vantiva asks direct material suppliers to certify that materials incorporated into the products comply with the laws regarding slavery and human trafficking of the country or countries in which the suppliers are doing business.

Depending on the annual spend amount with a Supplier and the Suppliers country-risk a supplier may be requested to complete a CSR (corporate social responsibility) assessment by a qualified third-party, typically EcoVadis. Based on the assessment the supplier may receive a request for an on-site audit either from Vantiva or, for some suppliers working in the electronics industry, as part of the validated audit process of the Responsible Business Alliance.

Vantiva uses the RBA Code of Conduct as a reference model for its audit approach focusing on the following elements:

- Child Labor
- Forced Labor or Involuntary Labor
- Health & Safety
- Discrimination
- Working Hours
- Compensation
- Freedom of Association and the right to Collective Bargaining

- Disciplinary Practices
- Management System

Any suppliers found not to meet required standards are required to undertake remediations with a time frame based on severity of the issue. Vantiva will cease business with any suppliers who fail to undertake adequate remediations.

### **Planned Further Action Areas**

Our Supplier Responsibility Program has addressed key material suppliers, and those with geographical risks and now we plan to review our smaller local Australian suppliers. We will engage with them regarding a code of conduct to take reasonable steps to ensure that modern slavery is not taking place in any part of the smaller local supply chain.

In addition to this, we plan to deliver training to our key staff involved in the supply chain to provide education and awareness of Modern Slavery.

Client-supplied components has also been identified as an area where further work may be required to review potential risks. This will be planned in due course to address this area.

To facilitate and assess actions taken to address risks, in addition to all other steps outlined previously, we have formed an Australian branch committee for Modern Slavery where periodic meetings will take place to review the status of the Supplier Responsibility Program. We will also review progress of our planned actions and will measure the number of local suppliers we have assessed complying to modern slavery requirements. We will also measure the number of training sessions that have been delivered internally.

### **Consultation**

The Group has consulted with the subsidiary entities described above in the preparation of this statement. This statement applies to the financial year ended 2023. This statement was approved by the Director of Technicolor Pty Ltd on 15 March 2024

A handwritten signature in blue ink that reads "Iain Fynes-Clinton".

**Iain Fynes-Clinton - Director**