

	<p>Modern Slavery Act 2015</p> <p>Slavery and Human Trafficking Statement</p>	<p>Doc. No.: 1</p> <p>Ver.: 1</p> <p>Page: 1 of 4</p>
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Constantia Flexibles Holding GmbH and all of its establishments and affiliated companies within the Constantia Flexibles Group ('Constantia Flexibles') are committed to improving its practices to combat slavery and human trafficking.

Organisation's structure

With its headquarters in Vienna, Constantia Flexibles is one of the world's leading manufacturers of flexible packaging. Constantia Flexibles supplies its products to numerous multinational corporations and local market leaders in the food, pet food, and pharmaceuticals industries. Constantia Flexibles stands for premium positioning, leading technology, customer proximity and highly efficient production facilities.

Based on the guiding principle of 'People, Passion, Packaging', Constantia Flexibles employs 7,400 employees worldwide and operates at 32 sites in 18 countries spread across the globe. Constantia Flexibles relies on a global supply chain to design, develop and manufacture its tailor-made, sustainable and innovative packaging solutions for many local market leaders from the food and pharma industries. Constantia Flexibles works directly with over 10.000 suppliers from more than 50 countries all over the world..

UK Business

Constantia Flexibles operates from two sites in the UK:

Constantia Flexibles Sales Ltd in Prestwick

This is a sales office for the dairy market, looking after all elements of supply into the UK & Irish markets from sales sourcing, pre press, quality and technical support and the completion to and from production to customer supply chain process. The sales team serve the dairy and die cut and reel fed lidding markets, and the technical market with a range of materials from a range of Cflex production sites.

Constantia Sittingbourne Ltd in Sittingbourne, Kent

The business operates a purpose built converting facility which currently supplies printed aluminum foil and laminate structures to the pharmaceutical and food industries as well as other business sectors using gravure and flexographic printing technologies.

Our policies on slavery and human trafficking

Constantia Flexibles balances economic success with environmental and social responsibility and is committed to acting ethically and with integrity in all its business relationships. As a consequence, Constantia Flexibles has taken an integrated approach to minimising the risk of slavery and human trafficking taking place in its supply chain or any part of its business. This is outlined in its **Code of Conduct** which underpins all of its activities and applies to all of its lines of business, branch offices, management and employees worldwide. Constantia Flexibles is committed to the principles of diversity, respect, working fairly, fair pay, compensation and benefits. These principles are based on the Universal Declaration of Human Rights of the United Nations, on the Conventions of the International Labour Organisation ('ILO') and the UN Conventions on the Elimination of all Forms of Discrimination against Women and on the Rights of the Child.

Constantia Flexibles sets similar standards globally for its suppliers through its **Code of Conduct for Suppliers and Subcontractors** Constantia Flexibles is committed to working in partnership and transparently with its suppliers to ensure the highest sustainable and ethical business standards are maintained. This is reflected in the General Purchasing Conditions **General Purchasing Conditions**.

Due diligence processes for slavery and human trafficking

Constantia Flexibles have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Provide contact points such as a Compliance Line and protect whistle blowers.

Supplier adherence to its values and ethics

To ensure all those in its supply chain and contractors comply with its values and ethics and to drive transparency, Constantia Flexibles encourages all of its first tier suppliers to join the ethical audit platform SEDEX. Being a member of SEDEX means Constantia Flexibles can

access its suppliers' social compliance audits through the system, as well as their self assessment questionnaires.

Constantia Flexibles use SMETA which is an audit structure based around labour rights, health and safety, environmental management and business ethics, with a view to increasing visibility of risk within its supply chain and then prioritise and mitigate that risk.

In addition, Constantia Flexibles conducts periodic site visits to its first tier supplier facilities to enable visual oversight of their employees' working conditions, providing assurance that its main suppliers respect international conventions on human rights and do not use child or forced labour.

Constantia Flexibles has a dedicated compliance team, which consists of involvement from the following departments:

- Legal
- Compliance & Internal Audit
- Human resources / Ethical Sourcing
- Procurement
- Quality Management

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in its supply chains and its business, Constantia Flexibles provides yearly Online Code of Conduct trainings and is in the process of designing and rolling out a bespoke training with special focus on the topic for members of its staff involved in procurement, sales, human resources and audit, as well as developing new tools, policies and procedures to ensure its employees are aware of the issues and equipped to identify and tackle modern slavery.

Our effectiveness in combating slavery and human trafficking

Constantia Flexibles is in the process of designing key performance indicators (KPIs) at initially first tier supplier level to measure how effective it has been to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Constantia Flexibles' slavery and human trafficking statement for the financial year ending 31st December 2016 by the management board of Constantia Flexibles Holding GmbH (Alexander Baumgartner, CEO and Stephan Kühne, CFO)

