

Constantia Flexibles Holding GmbH and all of its establishments and affiliated companies within Constantia Flexibles Group ("Constantia Flexibles") are committed to improving its practices to combat slavery and human trafficking.

1. Introduction

We, at Constantia Flexibles, are committed to responsible business practices protecting human rights. We have adopted a zero-tolerance approach to all forms of slavery and human trafficking in our organisation and supply chain, and we are focused on identifying, reporting, and addressing any human rights risks or abuses in our operations or our supply chain.

2. Our business and organisation's structure

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

Based on the guiding principle of 'People, Passion, Packaging', Constantia Flexibles employed over 8,500 employees worldwide and operated at 38 sites in 16 countries spread across the globe in 2022. 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 consumer, food and pharma industries. Constantia Flexibles works directly with over 10,000 suppliers from more than 50 countries all over the world.

With our presence in key markets, Constantia Flexibles' procurement teams ensure that production materials, assets and services are sourced worldwide in the required quality, in accordance with sustainability standards and at the best possible terms. The competitive advantages of the various procurement markets are utilised by Constantia Flexibles as a result of the brands' networking of the various procurement organisations.

Due to our presence in the United Kingdom and therefore, the applicability of the Section 54(1) of the United Kingdom Modern Slavery Act 2015, we are also stating the details of our operations in the UK in the below section.

2.1. Constantia Flexibles presence in the UK

Constantia Flexibles operates from two sites in the UK:

Constantia Sittingbourne Ltd in Sittingbourne, Kent

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

FFP Packaging Solutions Ltd in Northampton, Northamptonshire

The business also operates a purpose-built converting facility which currently supplies recyclable laminates offering flow wraps, lidding films, and pre-made pouches for food industry and retailers.

3. Policies

We balance economic success with environmental and social responsibility and are committed to acting ethically and with integrity in all our 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 our 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 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' suppliers are required to review and sign this Code to confirm their understanding and adherence.

Constantia Flexibles does not engage or enter into any relationship with suppliers, whose presence in the market and attitude towards their employees and subcontractors conflict with general ethics, principles, and ecological standards. Constantia Flexibles expects all suppliers and contractors to comply with its **Ethical Sourcing Policy**.

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**.

Constantia Flexibles' Code of Conduct and Code of Conduct for Suppliers and Subcontractors are available at all times to all employees on the Intranet and also to third parties on our corporate website and are continuously communicated in digital and print media, as well as at internal company events.

4. Risk assessment and due diligence processes

Constantia Flexibles has systems in place 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 Hotline and protect whistleblowers.

In addition, Constantia Flexibles has a dedicated compliance team which closely cooperates with the following departments:

- Legal,
- Internal Audit,
- Human Resources / Ethical Sourcing,
- Procurement,
- Sustainability,
- Sales,
- Quality Management.

4.1. Supplier adherence to our values and ethics

To ensure that all partners in our supply chain and their subcontractors comply with our values and ethics and to drive transparency, Constantia Flexibles encourages its first-tier suppliers to join the ethical audit platform SEDEX. Constantia Flexibles use SMETA which is an audit structure based on ETI Base Code principles and 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. 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 and risk assessments.

Constantia Flexibles is increasing its personnel visibility on overseeing the conditions, including employees' working conditions, when visiting and/or auditing suppliers, ensuring that its main suppliers respect international conventions on human rights and do not use child or forced labour.

5. Training

Preventive measures promote compliance at Constantia Flexibles and raise compliance awareness among employees. Target group-oriented communication and training measures for employees at all hierarchical levels play a key role in this. In the reporting period, specific communication and training activities continued to focus primarily on the Code of Conduct, the prevention of corruption and anti-competitive behaviour. These two latter trainings are also mandatory for relevant groups of employees (e.g., members of top management, sales, and procurement teams) and have been rolled out across Constantia Flexibles since 2018. The contents can be flexibly integrated into wider compliance training but can also be used as intensive courses to provide a separate and comprehensive introduction to the topic. For example, the Code of Conduct 2022 training now contains a deep dive on human rights.

Constantia Flexibles also continues to pursue the communication strategy it developed in previous years in order to increase the transparency in human rights.

6. Evaluating our effectiveness in combating slavery and human trafficking

Constantia Flexibles participates in annual assessments with EcoVadis, the world's largest provider of business sustainability ratings that uses a methodology aligned to international standards. We submitted evidence of our progress on labour and human rights, ethics, environment, and sustainable procurement, which includes sharing relevant internal policies and results in a scorecard outlining strengths and areas of improvement.

Furthermore, Constantia Flexibles endorses the ethical standards represented by Sedex with several of our production sites being SMETA audited.

Constantia Flexibles is also in the process of designing further risk assessments 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. We are committed to continuing to work towards developing a scalable process for assessing the risk related to our suppliers and to create even greater transparency of the sustainability performance of our supply chain.

7. Closing message

This statement is made pursuant to Section 54(1) of the United Kingdom Modern Slavery Act 2015 and constitutes Constantia Flexibles' slavery and human trafficking statement for the financial year ending 31st December 2022 by the Management Board of Constantia Flexibles Holding GmbH (Pim Vervaat, CEO, and Richard Kelsey, CFO).