



## CCL INDUSTRIES INC.

### Forced Labour and Child Labour in Supply Chains Report for the year ended December 31, 2023

#### **The entity's structure, activities and supply chains.**

CCL Industries Inc. (the "Company" or "CCL") is a global specialty packaging company employing approximately 25,700 people in 213 production facilities located North America, Latin America, Europe, Australia, Africa and Asia. The Company manages four principal business segments: CCL, Avery, Checkpoint and Innovia.

CCL is the world's largest converter of pressure sensitive and specialty extruded film materials for a wide range of decorative, instructional, functional and security applications for government institutions and large global customers in the consumer packaging, healthcare and chemicals, consumer electronic device and automotive markets. Extruded and laminated plastic tubes, aluminum aerosols and specialty bottles, folded instructional leaflets, precision decorated and die cut components, electronic displays, polymer banknote substrate and other complementary products and services are sold in parallel to specific end-use markets.

Avery is the world's largest supplier of labels, specialty converted media and software solutions for short-run digital printing applications for businesses and consumers available alongside complementary products sold through distributors, mass-market stores and e-commerce retailers.

Checkpoint is a leading developer of RF and RFID based technology systems for loss prevention and inventory management applications, including labeling and tagging solutions, for the retail and apparel industries worldwide.

Innovia is a leading global producer of specialty, high performance, multi-layer, surface engineered films for label, packaging and security applications.

As with any other global company, CCL's supply chain is complex and consists of a number of suppliers globally. The Company purchases a broad range of materials and components at market prices in connection with its manufacturing activities. Major purchased items include pressure sensitive label stock, extruded films, adhesives and inks for the production of labels; metals and aluminum slugs for the manufacture of extruded aluminum aerosol cans and bottles; electronic components, circuit boards, resins and chemicals for the construction of smart labels and associated hardware; resin for the manufacture of polypropylene films and polymer banknote substrates; metal rings for binders plus tooling and printing plates across all business lines.

#### **Any policies and due diligence processes relating to forced and child labour.**

The Company respects the human rights of its employees worldwide and is committed to the well-being of the communities in which we do business. The Company has a number of policies and practices in place relating to forced labour and child labour, including:

## [Global Business Ethics Guide](#)

The Company's Global Business Ethics Guide ("Ethics Guide"), which is available in 23 languages, is the primary policy on workplace practices, human rights, health and safety and ethical conduct. It applies to all employees, directors and officers of CCL. Prior to employment, new employees must read, understand and comply with this Ethics Guide. Failure to comply with these principles may result in disciplinary action, up to and including termination. The Ethics Guide also applies to all subsidiaries of the Company, including joint ventures in which we have at least 50% interest or controlling ownership. Employees of such subsidiary companies are also required to read, understand and comply with the Global Business Ethics Guide.

The Ethics Guide outlines the Company's expectations on various ethical issues and provides guidance on ethical decision-making. It also provides additional resources to help employees make ethical decisions and maintain the Company's reputation for high ethical standards. Managers must also promote an environment that invites open and honest communication, which includes supporting any employee who brings forward a concern to be discussed and ensuring that no employee suffers retaliation for doing so.

Each year, a certification is required to be signed by each of Company's General Managers worldwide confirming distribution of the Ethics Guide to their employees and compliance with the Ethics Guide.

## [Ethics Hotline](#)

CCL has adopted an open-door policy to establish a work environment where employees can feel free to share ideas, ask questions and share concerns. Each employee has the responsibility to promptly report any violation or potential violation of this Ethics Guide to a supervisor, local management team member or Human Resources representative. In addition, the Company maintains an independent and confidential global Ethics Hotline for employees to call or access through the Internet in order to report a breach or suspected breach of the Ethics Guide or any violation of a law, including those related to forced and child labour.

CCL prohibits retaliatory action against employees who report or inquire in good faith about ethical issues or concerns.

## [United Nations Global Compact](#)

As part of the Company's commitment to being a global role model for ethical business conduct, the Company has signed onto the Ten Principles of United Nations Global Compact (UNGC) on human rights, labour, environment and anti-corruption. In 2022, CCL completed its first Communication on Progress as we align our corporate goals with the mission.

## [Expectation of our Suppliers](#)

We expect companies and individuals who supply the Company's global facilities with either materials or services to share our values and take reasonable steps to guard against exploitation within their businesses and supply chains. The Company selects its suppliers on the basis of reputation, among other things. We expect the standards set out in our Ethics Guide to be met by our suppliers, even in jurisdictions where meeting such standards may not be considered part of the usual business culture. Failure to adhere to the Company's policies can result in the termination by CCL of the supply relationship. The Company communicates its expectations through a combination of its interaction with suppliers, site visits and the use of contractual provisions in its supply agreements.

The Company is currently engaged in preparing a Global Supplier Code of Conduct, which will form part of the Company's contract provisions and purchase order Terms and Conditions. The Company expects to release the Global Supplier Code of Conduct later this year.

**Any steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used i) in the production of goods in Canada or elsewhere by the entity or ii) of goods imported into Canada by the entity.**

In addition to the policies and procedures described above, during the 2023 financial year, the Company carried out the following actions:

- Distributed annual ESG questionnaires, to each of the Company's manufacturing sites globally, which included questions relating to human rights topics, including child labour.
- Conducted a preliminary risk assessment to identify the business segments and geographies that could pose a potential risk for the Company globally, as described below.
- Maintained our global Ethics Hotline for employees to report a breach or suspected breach of the Ethics Guide or any violation of a law.
- Continued to work with responsible and reputable recruitment or placement agencies to ensure that no persons under the age of 15 (or younger if prohibited by local law) are recruited and that employees are legally able to work.

**Any parts of the business and supply chains that carry a risk of forced or child labour and steps taken to address and manage such risk.**

The Company has conducted a preliminary risk assessment based on a comparison of its operating geographic footprint against those countries identified in Walk Free Foundation's 2023 Global Slavery Index as having an overall score of 50 or above in terms of vulnerability to modern slavery. CCL operates in 11 of the 75 countries identified.

The supply chains associated with an elevated risk of forced and child labour in these 11 countries include electronics and garments. The Company's CCL Design sector serves the electronics industry with long-life, high-performance labels and Checkpoint's ALS product line serves the apparel industry with its labeling and tagging solutions.

In addition to the policies and due diligence processes mentioned above, the senior executive team of each of the Company's business segments conducts regular visits to the facilities under their supervision. During those visits, an inspection of the facility is conducted and executives remain alert to any indications of forced or child labour.

The Company also continues to examine ways to improve its assessment and management of risks in these jurisdictions through awareness, training, best practices or other assistance to our employees and suppliers.

**Any measures to remediate forced or child labour.**

To our knowledge, there were no incidents of non-compliance in our operations or supply chains. Therefore, no remediation measures were necessary in 2023.

**Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.**

To our knowledge, there were no incidents of non-compliance in our operations or supply chains. Therefore, no remediation measures were necessary in 2023.

**Any training provided to employees on forced or child labour.**

The Company's legal personnel conduct both live and virtual training sessions with members of the Company's management on the policies set out in the Ethics Guide.

**How the entity assesses its effectiveness in ensuring that forced or child labour are not being used in its business and supply chain.**

Monitoring the effectiveness of our actions is a key element to ensure we are reducing the risk of forced and child labour. The Company's internal audit group conducts regular audits of the Company's facilities worldwide and assesses the effectiveness of our corporate governance and human resources policies and processes.

In addition, the Company's sustainability group reviews the annual ESG data collected from its operations to ensure that its policies and practices are functioning as intended.

The Company also supplies ESG data on an annual basis to various key platforms that rank the Company's ESG performance for a variety of stakeholders, including investors and our largest customers. The Company actively engages with the following platforms to ensure accurate reporting of the Company's performance: EcoVadis and S&P Global.

**Approval, Attestation and Signature**

Approved by the Board of Directors of CCL Industries Inc. on February 22, 2024.

In accordance with the requirements of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

*/s/ Geoffrey T. Martin*

Geoffrey T. Martin  
President, Chief Executive Officer and Director  
February 22, 2024  
*I have the authority to bind CCL Industries Inc.*