



REPORT

CORPORATE ACTION ON FORCED AND CHILD LABOR IN THE SUPPLY CHAIN

REPORTING YEAR 2023

APPLICABILITY

This joint report provides an awareness of Hoffmaster Group, Inc.'s (HGI) commitment to our corporate policy for responsible sourcing, legal obligations, and existing international standards related to slavery, child labor, and human trafficking and outlines how we demonstrate compliance to satisfy the expectations of our customers, stakeholders, and regulators. To demonstrate compliance, Hoffmaster is compelled to make disclosures regarding Accountability, Certification, Verification, Audit, Training, and Reporting.

Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (S-211) requires the disclosure of actions taken to prevent and reduce the risk of forced or child labor within our supply chain and/or production of items imported into Canada.

California Transparency in Supply Chains Act of 2010 requires companies doing business in the state of California with worldwide gross receipts more than \$100 million to publicly communicate their efforts to identify and eliminate forced labor in their supply chains.

United Kingdom Modern Slavery Act of 2015 also requires companies doing business in the UK with an annual turnover of £36 million GBP or more to disclose annually the actions they have taken to ensure there is no modern slavery in their business or supply chains.

This report covers all operations and support functions in place at the listed locations, collectively: "Hoffmaster," "we," or "us," and/or "the organization":

- Hoffmaster (Oshkosh, WI, USA)
- Lapaco (Sainte-Catherine, Quebec, Canada)
- Creative Converting (Clintonville, WI, USA)
- Graphic Management Specialty Products (Oconto, WI, USA)
- Aardvark Straws (Ft. Wayne, IN, USA)
- Paterson Paper (Sparks, NV, USA)

CORPORATE SUMMARY

Founded in 1947 in Oshkosh Wisconsin, Hoffmaster Group, Inc. is a North American company headquartered in Wisconsin. Hoffmaster is a designer, manufacturer, and supplier of premium and decorated single-use tableware, napkins, plates, placemats & doilies, party décor, table covers, and other related products.

The organization is structured through two main channels, Foodservice and Consumer. The Hoffmaster organization includes six locations with an overarching corporate management system: Hoffmaster, Lapaco, Creative Converting, Graphic Management Specialty Products (GMSP), Aardvark Straws, and Paterson Paper.

Hoffmaster is committed to conducting business in a socially responsible manner. This includes the recognition that we have a responsibility to ensure that forced labor, child labor, and human trafficking do not occur in our supply chain. We seek to operate in compliance with all applicable national laws in the regions we do business and to respect and support international principles aimed at preventing and eradicating human trafficking and slavery, as outlined by the International Labour Organization (ILO) Core Conventions.

Hoffmaster®

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SUPPLY CHAIN OVERVIEW

Hoffmaster Group has a centralized Procurement function sourcing raw materials and finished goods domestically within North America and overseas from more than 200 suppliers located in:

- Bangladesh
- China
- France
- Germany
- Indonesia
- Spain
- Taiwan
- Turkey
- United States
- Vietnam

Hoffmaster facilities distribute products throughout North America and European markets.

RISK

Due to Hoffmaster's rigorous hiring process, internal commitment to safety and workers' rights, as well as ongoing monitoring, we affirm that the risk of child and/or forced labor within our own operations is negligible.

Hoffmaster recognizes that the greatest risk of exposure to forced labor and child labor is through the complexity of our global supply chain and has in place multiple practices to mitigate this risk. The primary sources of these risks come from procuring goods in higher-risk regions of the world.

POLICIES & DUE DILIGENCE TO PREVENT AND REDUCE THE RISKS OF FORCED AND CHILD LABOR

Employee Guidelines

Hoffmaster maintains internal accountability procedures for employees, including an Employee Code of Conduct and Business Ethics. As such, it is the responsibility of all HGI employees to know, understand, and comply with all laws and business conduct policies relative to their business activities and to conduct them with uncompromising honesty and integrity.

Hoffmaster does not permit the use of child or forced labor in any of our operations. We do not tolerate unacceptable worker treatment, such as exploitation of children, physical punishment or abuse, or involuntary servitude. Hoffmaster prohibits its suppliers from engaging in or supporting the trafficking of human beings. All individuals are verified to be at or above the legal minimum age at the time of employment.

Hoffmaster Group, Inc. pays employees a competitive wage, as benchmarked against industry practices. At a minimum, we comply with all applicable wage and hour laws, rules, and regulations, including those pertaining to minimum wage, overtime, and maximum hours.

Supplier Compliance & Sustainability Certification Code

Hoffmaster's Compliance & Sustainability Certification Code serves as our corporate supplier code of conduct. This document outlines the organization's beliefs, principles, and requirements for business partnership.

Suppliers shall comply with all applicable human rights laws, regulations, and industry best practices including, but not limited to, the Fair Labor Standards Act (Department of Labor Monitoring Guide), International Labor Organization (ILO) Conventions and the United Nations (UN Guiding Principles on Business and Human Rights).

Suppliers are prohibited from employing any workers under the age of 14, under the minimum age as established by applicable law in the country of manufacture, and/or under the age of completing compulsory education, whichever is older. Hoffmaster does not knowingly work with suppliers who utilize child labor.

Hoffmaster prohibits its suppliers from engaging in or supporting the trafficking of human beings. We expect our suppliers and contractors, with whom we do business, to uphold these principles and will not knowingly utilize suppliers who do not.

Suppliers shall not use involuntary labor of any kind, including prison labor, indentured labor, bonded labor, or labor obtained through human trafficking, coercion, or slavery. Workers must not be restricted from movement or required to lodge "deposits" or identity papers upon commencing employment with the company.

Supplier Accountability and Audits

Externally, Hoffmaster requires each supplier to read and understand our Supplier Code of Conduct as described above, and certify their agreement to comply. Failure to comply with the Supplier Code may result in the cancellation of orders and termination of the business relationship.

Hoffmaster's direct finished goods suppliers are audited by retail customers and independent third-party monitors. Most suppliers are audited at least annually, with many are audited more often. Audit reports are reviewed, and corrective action

plans are completed, when necessary, with oversight from the Regional Team as well as the Corporate Compliance Team as needed. Hoffmaster reserves the right to audit suppliers directly on an as-needed basis.

REPORTING

Hoffmaster has an anonymous incident reporting system entitled Speak Up Hoffmaster®. This system enables an employee, customer, supplier, or any outside party to submit a report of violation, or perceived violation, via the internet (www.speakuphoffmaster.com) or by calling the toll-free number (800-461-9330). The conflict, issue, or question reported is forwarded to a call center, available 24 hours a day, seven (7) days a week. The system accommodates the native languages of the countries where we do business and the native languages of most workers.

REMEDATION

If an instance of forced labor, child labor, or human trafficking is discovered within our operations, Hoffmaster will immediately investigate, and where necessary implement a corrective action plan. Employees are directed to promptly report any violations, or perceived violations of the Code of Conduct and Business Ethics through several options, including an anonymous reporting system that enables employees to submit a report online or by calling a toll-free number.

PROGRAM EFFECTIVENESS

Hoffmaster reviews our corporate policies, including codes of conduct, and completes self-audits at least annually to ensure ongoing compliance within our own operations.

Review and tracking of third-party audit results from external suppliers is used to assess supplier performance over time.

At the time of this publication, Hoffmaster is not aware of any identified incidents of forced or child labor either within our own operations or supply chain.

TRAINING

Hoffmaster performs initial training on the Employee Code of Conduct and Business Ethics with every employee during orientation. Annual refresher training is given to all employees. This Code of Conduct contains our policy on eliminating slavery and human trafficking from the workplace. Annual refresher training is given to all employees. Employees who have direct responsibility for social compliance and ethical responsibility within the supply chain receive training on industry practices throughout the year via seminar, webinar, reading material, consultants, auditors and other sources.

Suppliers shall communicate the requirements of the Supplier Code, including the anonymous incident reporting system, to all employees or contractors who will be conducting business with Hoffmaster or involved in the supply chain that supports Hoffmaster products. Additionally, suppliers shall conduct training on topics necessary for compliance with the Supplier Code.

ATTESTATION

In accordance with the requirements of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S-211; "The 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.

Aaron T. Holt

Full Name

Vice President - CFO, Secretary and Treasurer

Title

5/15/2024

Date



Signature

I hereby affirm that I have the authority to bind Hoffmaster Group, Inc. to the above-described conditions.