

SCHOELLER ALLIBERT

Fighting Against Forced Labour and Child Labour Statement

24 May 2024

Introduction

Schoeller Allibert has been inventing, developing, designing, and manufacturing returnable transport packaging for more than 65 years. Schoeller Allibert has led the change in revolutionising supply chains with solutions that are both efficient and sustainable since the inception of the plastic crate. Our purpose is simple yet profound: to accelerate sustainable supply chains through innovative, reusable solutions, which are efficient by design and circular by nature. With every product we take a step towards a more sustainable future

Schoeller Alibert is a one of the world's largest manufacturers of returnable plastic packaging for material handling and the European market leader, with an annual turnover of EUR 559 million (financial year 2023) and over 1,600 employees worldwide.

This Statement has been prepared as a joint statement, made by each of the entities of the Schoeller Allibert Group set out in [Annex I](#) (together the “**Reporting Entities**”). In this Statement, references to “we”, “us” or “our” refer to the Reporting Entities.

The Canada’s Bill S-211, an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the “**Act**”), requires certain Schoeller Allibert group entities, based or operating in Canada, to set out the steps taken to identify and mitigate the risks of slavery and human trafficking in their business and supply chains. This Statement is made in accordance with the Act and relates to the period from January 1 through December 31, 2023. It will be the first statement under the Act.

Services provided by the Reporting Entities, include:

- Designing, manufacturing, selling and marketing reusable and returnable plastic packaging solutions;
- Renting out our products and our smart bulk containers in particular;
- Group holding and related activities;
- Conducting and exploit activities of an industrial, financial or commercial nature; and
- Any and all activities conducive to the attainment of the above-mentioned activities.

Commitment

We are committed to conducting business with integrity, honesty and in an ethical and responsible manner, including by carrying out our activities in a manner that respects and supports the protection of human rights, including but not limited to:

1. operating with leading health and safety practices to support the goal of zero serious safety incidents;
2. striving to ensure that the interests, safety and well-being of the communities in which we operate are integrated into our business decisions;
3. the elimination of discrimination in employment;
4. the prohibition of child and forced labour; and
5. the eradication of harassment and physical or mental abuse in the workplace.

We recognize that the risks of modern slavery and human trafficking are complex and evolving, and we continue to work to address these in our business. Our approach and processes are periodically reviewed and, where appropriate, updated as necessary to reflect changes in circumstances and practice.

How This Statement Was Prepared

With the help and guidance of internal and external stakeholders, the Reporting Entities have discussed the preparation of this modern slavery statement in a working group comprised of representatives of various departments, including HR, IT Security, Procurement, Legal and Compliance (the “**Risk Management Team**”).

The Risk Management Team will further coordinate the development and implementation of the Reporting Entities’ modern slavery approach and will work to increase integration of this approach with the Reporting Entities’ core business activities, including contracts, due diligence processes, training and communications, as appropriate. The Risk Management Team will review the existing anti-slavery and human trafficking policy and framework through collaborative consultation with the appropriate internal stakeholders and, where appropriate, external advisors to verify that the operations and processes of the Reporting Entities meet applicable legal requirements and our internal standards. Ongoing consultation also takes place through various forums such as management meetings, supervisory board and committee meetings and periodic reviews associated with the risks of each business within scope.

The statement was reviewed by members of the Risk Management Team before being formally approved by the relevant boards.

Summary of Key Activities in 2023

We reviewed and updated our group-wide Anti-Slavery and Human Trafficking Policy as well as our Human Rights and Labor Policy. In 2023 we took the first steps in preparing and developing the necessary documentation to conduct a separate human rights and modern slavery risk assessment, with the objective of assessing and mitigating the risks of modern slavery and human rights violations occurring within the Schoeller Allibert Group, including in our supply chains. The human rights and modern slavery risk assessment is scheduled to be carried out in financial year 2024.

Our Business Activities

Assessing Modern Slavery Risk

Our approach to addressing modern slavery is designed to be commensurate with the risks we face, which vary based on several factors, including jurisdiction, industry and sector.

Modern Slavery Risk Profile

1. Third-Party Suppliers

Given the nature of our business and the geographic locations in which we operate, third-party suppliers and suppliers used across the Reporting Entities' businesses generally fall within the below categories:

COMODITY SUPPLIERS

Encompasses a range of materials and products which are used in the manufacturing processes of our products. This includes suppliers of virgin and recycled materials.

SUBCONTRACTORS

Includes a variety of subcontractors which we engage to manufacture products or parts thereof on our behalf and over which we exercise limited control.

EQUIPMENT AND MACHINERY SUPPLIERS

Includes mould manufacturers, dunnage suppliers, parts suppliers and suppliers of machinery required for the products

manufactured by the Schoeller Allibert Group.

PROFESSIONAL SERVICES

Includes consulting, legal, human resources, accounting, training, tax, audit, banking and education.

PROPERTY AND FACILITIES MAINTENANCE

Includes building repairs and maintenance, cleaning, security and utilities, and public services.

EMPLOYMENT AGENCIES

Includes providing payroll, interim and recruitment solutions.

SOFTWARE PROVIDERS

This includes the software used to facilitate our business processes.

The Reporting Entities continuously strive to achieve excellence with respect to our contracting practices because we believe that adequately compensated and trained workers, operating in fair working conditions deliver high-quality products and services. We believe that the risk of modern slavery within the majority of our third-party suppliers is low, this assessment is based on the regulated industries in which they operate and the skill of the professionals providing such services.

However, we acknowledge that, to a lesser extent, we engage with suppliers who may be considered higher risk in terms of modern slavery, which may include cleaning services or commodities which are potentially sourced from certain countries outside Europe, the US or Canada where employment standards are much lower. We recognize that each of our suppliers has its own supply chain. Our supplier due diligence assessments considers this risk where appropriate and possible (as further set out in paragraph 3. below), but we currently do not always have full visibility of these extended supply chains.

2. Employees

Our people drive our success. All employees of the Reporting Entities are employed in the Netherlands and the majority are professional and administrative staff. The Reporting Entities have a group-wide Code of Conduct in place which each new employee, director, officer, contractor and temporary worker is requested to sign at the start of employment for the Schoeller Allibert Group. The Code of Conduct sets out what behaviour we expect from everyone engaged by the Schoeller Allibert Group. Among other topics, the Code of Conduct addresses compliance with our human resources policies, procedures and processes in place designed to - among others - protect against modern slavery and human trafficking in the Reporting Entities' employee population. These include:

- a. Employment conditions promoting fair compensation and working hours in line with industry standards;
- b. Processes for reporting and resolving staff concerns and grievances;
- c. Non-discriminatory hiring practices;
- d. Employment screening (including work eligibility checks); and
- e. Appropriate workplace behaviour.

Through our group-wide Human Rights and Labor Policy, all employees are responsible for creating a respectful environment and are required to identify and report workplace discrimination, violence, threatened or suspected human rights infringements and harassment as it occurs. The group-wide Anti-Slavery and Human Trafficking Policy further addresses how the employees of the Reporting Entities are to cause the Reporting Entities to conduct their businesses in an ethical and responsible manner, including by carrying out our own business activities in a way that respects and supports the protection of human rights through striving for the:

- a. Elimination of discrimination in employment;
- b. Prohibition of modern slavery, including child and forced labour; and
- c. Eradication of harassment and physical or mental abuse in the workplace.

The Anti-Slavery and Human Trafficking Policy educates the Reporting Entities' employees on the recognition of modern slavery. These topics are also addressed as part of the Employee Code of Conduct training, which is organized annually. This training is mandatory for all professional and administrative staff.

Based on the above, we consider that there is a low risk of modern slavery within employee population of the Reporting Entities.

3. Business Operations – Supplier due diligence

To maintain our reputation for producing safe, high-quality products, each of the Reporting Entities is committed to uphold high ethical standards, going beyond what is expected pursuant to applicable law.

As part of our responsible procurement policy, we have introduced our supplier Code of Conduct (the "**Supplier Code**"). The Supplier Code sets out the minimum standards to be upheld by all suppliers and (supplier) sub- contractors of the Schoeller Allibert Group. This Supplier Code also aims to prevent human rights infringements in our supply chain, by imposing upon our suppliers the obligations to:

- a. conduct its business with integrity;
- b. recognize the human rights of all people as outlined in the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights;
- c. take appropriate action to avoid infringement of human rights and for remediating the impact, if any;
- d. uphold the principles of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and ensure no member of the workforce is (i) employed against their will, (ii) transported for exploitation, (iii) engaged in slavery or servitude or (iv) deprived of their rights;
- e. act in accordance with the minimum age requirements as outlined in the relevant ILO conventions and the laws of the countries of operation are adhered to and ensuring children under the age of 16 are not employed; and
- f. ensure working hours and remuneration comply with laws while also being fair and just, meaning that overtime is appropriately compensated, and leave is offered as required.

Acceptance of and adherence to our Supplier Code comprises an important component of our supplier selection and evaluation process. Our Supplier Code also requires our suppliers to replicate the standards reflected therein further down the supply chain. This Supplier Code of Conduct is therefore made available to our suppliers with the goal of strengthening our mutual understanding of how good, ethical and sustainable practices should be incorporated in day-to-day business.

To further uphold and enforce the practices set out in our Supplier Code of Conduct, in 2023 we have introduced due diligence monitoring. Due diligence research involves analysing our Suppliers carefully for economic, legal, tax and financial conditions. This includes, for example, analysing possible human rights infringements of the supplier or taking place in a suppliers supply chain such as the use of child labour or the financing of terrorism.

Management of Modern Slavery Risks

4. Governance

We recognize that strong governance is essential to sustainable business operations, and we aim to conduct our business according to the highest ethical and legal standards. Our approach to addressing modern slavery is designed to be commensurate with the risks we face, which vary based on several factors, including jurisdiction, industry and sector. Key supporting policies and guidelines (together, the “**Policy Framework**”) include, but are not limited to:

CODE OF CONDUCT

The Reporting Entities’ Code outlines our commitment to conducting business in an ethical and responsible manner, among other things through striving for:

- a. the elimination of discrimination in employment;
- b. the prohibition of modern slavery, including child and forced labour; and
- c. the eradication of harassment and physical or mental abuse in the workplace.

At the start of employment, employees are required to sign and accept the Code and the protocols incorporated therein.

SA HUMAN RIGHTS AND LABOR POLICY

This policy addresses the way in which the Reporting Entities support, respect and protect human rights in our relationships with our employees, suppliers, and business partners. Furthermore, this policy codifies how concerns and complaints of the Reporting Entities' workers, suppliers and business partners are addressed and provides tools and a mechanism for the effective remediation of any direct or indirect contribution to any human rights impact.

ANTI- MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

This policy aims to codify the Reporting Entities' approach to minimizing the risk of modern slavery within their business and supply chain.

WHISTLEBLOWING FRAMEWORK

The Reporting Entities are committed to conducting business with honesty and integrity and staff and external stakeholders are expected to maintain high standards. The Reporting Entities have incorporated a Whistleblowing Framework which clearly sets out the reporting requirements and responsibilities, and outlines whistleblowing procedures addressing how to raise a concern, confidentiality, as well as remediation, external disclosures and our zero tolerance for retaliation or malicious acts. The Whistleblowing Framework is comprised of our:

- a. Whistleblower Policy for Internal Reporting: an internal procedure to encourage and enable employees to raise serious concerns internally allowing the Reporting Entities to address and correct inappropriate conduct and actions;
- b. Whistleblower Policy for External Reporting: an external procedure for addressing concerns which (i) reasonably cannot be raised internally or (ii) after completing the internal reporting procedure were not timely or adequately addressed; and
- c. Third Party Whistleblower Policy: encouraging the third parties such as suppliers, contractors and customers, to raise serious concerns.

SUPPLIER DUE DILIGENCE PROCEDURES

In connection with any supplier engagement, employees are required to comply with the Reporting Entities' policies and procedures, including those in relation to preventing and combating human rights violations.

Our Supplier Code sets out our expectations of suppliers that provide goods or services to the Reporting Entities and, where appropriate, supply contracts should include acceptance of the Supplier Code or reference to equivalent policies in place at the supplier.

The Reporting Entities' approach to addressing high-risk, third-party suppliers includes conducting enhanced due diligence checks, the use of specific contract clauses in legal agreements, requiring suppliers to provide their modern slavery statement and evidence modern slavery mitigation strategies.

FINANCIAL CRIME POLICIES

These include our anti-bribery and corruption, and anti-money laundering programs that are designed to prevent financial crime and the movement of money derived from crime (including crimes relating to modern slavery).

Modern slavery and financial crime are closely linked, as proceeds from modern slavery and human trafficking need to be 'cleaned' before entering the mainstream economy. Therefore, preventing the onboarding of those involved in financial crime, identifying suspicious or criminal activity, and making reports to the relevant authorities not only supports the fight against money laundering, but also the fight against modern slavery by association.

Our Compliance Framework is reviewed periodically and updated as necessary.

5. Training

Annually, Reporting Entities' employees receive annual Code of Conduct training and anti-bribery and corruption training. Additional training relevant to applicable regions and roles, particularly in higher-risk functions such as finance and procurement, is provided. The recognition and prevention of modern slavery is addressed as part of these trainings, however during the Reporting Period no training solely dedicated to human rights and modern slavery was offered during the Reporting Period.

6. Risk Assessment

The Reporting Entities recognize the importance of risk assessments to promote the eradication of modern slavery. As the modern slavery risk for each of the Reporting Entities may vary based on the nature and location of its business operations, the Reporting Entities have taken first steps in preparing the necessary documentation to carry out a group wide risk assessment in coming years.

7. Remediation

Where possible, we will seek to use our influence to resolve any identified concerns.

8. Whistleblowing Hotline

The Reporting Entities maintain an anonymous reporting hotline ("**Hotline**") for employees, suppliers and other parties to anonymously report, among other things, any matters relating to suspected unethical, illegal, unsafe or other unwanted behaviour. Modern slavery and human trafficking issues are reportable on the Hotline. The Hotline is managed by an independent third party and is accessible 24/7 by telephone (toll free) at the numbers listed in Appendix II or by submitting an anonymous report online at the websites in Appendix II. The Hotline is available in multiple languages to mitigate any language barriers and to provide information to those intending to report.

9. Measure of Effectiveness

The Reporting Entities acknowledge that modern slavery and human trafficking are possible risks within their operations and supply chain. The Reporting Entities undertake various steps to address these risks in their business, including reviewing our policies and business practices and updating these where necessary to ensure they reflect our intentions to implement and enforce effective systems and controls to reduce the risk of modern slavery in our business and supply chains.

We acknowledge there is always room for improvement. As such, our ambition for the years to come is to improve the measurability of the effectiveness of our modern slavery program through:

- regular engagement and feedback from key stakeholders, including through active promotion of our reporting Hotline; and
- implementing and conducting a separate human rights and modern slavery risk assessment and updating this assessment on an annual basis; and
- develop and implement specific human rights and modern slavery trainings for our employees.

Process of Consultation

The Reporting Entities took a cross-functional approach to preparing and drafting this Statement. A consultation process was undertaken. The management board of each Reporting Entity was given an opportunity to consider and provide comments to the Statement.

Approval


This Statement has been prepared by the Risk Management Team and has been approved by the boards of the Reporting Entities on ___ May 2024,

REPORTING ENTITIES

Schoeller Packaging B.V.

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Schoeller Allibert Services B.V.

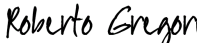
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By: Aake Bengtsson

Schoeller USA Inc.

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By: Roberto Gregori

APPENDIX I
Reporting Entities

Reporting Entities

1. Schoeller Packaging B.V.
2. Schoeller Allibert Group B.V.
3. Schoeller Allibert Services B.V.
4. Schoeller Allibert USA Inc.

This Statement is made on behalf of Reporting Entities in accordance with Bill S-211: Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff

APPENDIX II

ETHICS HOTLINE CONTACT DETAILS

Reporting Hotline

Austria – 0-800-200-288

Belgium – 0-800-100-10

Chile – 800-800-288

China (Southern) – 10-811

China (Northern) – 108-888

Czech Republic – 800-142-850

Finland – 0800-9-13259

France – 0800-91-3935

Germany – 0-800-225-5288

Hungary – 06-800-011-11

Italy – 800-172-44

Ireland – 1-800-946-551

India – 000-117

Latvia – 8000-2288

Luxembourg – 800-85-269

Mexico – 800-288-2872

Netherlands – 0800-2424-001

Poland – 0-0-800-111-1111

Romania – 0808-03-4288

Spain – 900-99-0011

Sweden – 020-799-111

Switzerland – 0-800-890011

United Arab Emirates – 8000-021

United Kingdom – 0808-234-9090

United States – 1-855-409-9919

Online

<https://secure.ethicspoint.com/domain/media/en/gui/57211/index.html>