Modern Slavery Report January 1, 2023 to December 31, 2023 Sonoco Products Company



This Modern Slavery Report (the "Report") addresses the period from January 1, 2023 to December 31, 2023 and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the "Act"). This Report is made on behalf of Sonoco Products Company ("SPC") and certain of its subsidiaries (collectively "Sonoco," the "Company," "we," "our," or "us"). Information contained on the websites referenced in this report is not part of, or incorporated by reference into, this report.

1. Introduction

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading developer, manufacturer and seller of a wide variety of packaging products, Sonoco recognizes the important role that we have in ensuring that our operations and products, and the supply chains that support such operations and products, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chains. This Report sets out the steps we have taken in 2023 to prevent and reduce the risk of forced labour or child labour being used in the production of goods we produce in Canada or elsewhere or import into Canada.

Our Business

All Sonoco business in Canada is conducted through Sonoco Canada Corporation and Sonoco Flexible Packaging Canada Corporation, both of which are wholly owned direct subsidiaries of SPC.

SPC is a packaging company headquartered in the United States. SPC is a global provider of highly engineered and sustainable packaging products serving multiple end markets. SPC sells rigid paper containers, metal packaging, thermoformed flexible packaging and industrial paper packaging to Canadian customers.

Sonoco Canada Corporation is a manufacturing company with operations in Edmonton, Alberta; Chatham, Ontario; Bradford Ontario; Mississauga, Ontario; Cap de Madelaine, Quebec; and Saint John, New Brunswick. Sonoco Canada Corporation manufactures and sells paper, converted paper, and rigid paper products. Sonoco Canada Corporation procures goods and services from approximately 100 external suppliers and contractors. The suppliers Sonoco Canada Corporation engages include businesses that produce certain raw material inputs, including recycled paperboard, adhesives, metal ends, and chemicals for producing paper and converted paper products.

Sonoco Flexible Packaging Canada Corporation is a manufacturing company with operations in Mississauga, Ontario and Terrebonne, Quebec. Sonoco Flexible Packaging Canada Corporation develops, manufactures, and sells flexible packaging products, serving a variety of end markets in food (e.g., snacks, cookies, and confections) and personal care. Sonoco Flexible Packaging Canada Corporation's supply chain includes businesses that supply goods and services to our organization, almost entirely from North America. Sonoco Flexible Packaging Canada Corporation procures goods and services from approximately 50 suppliers and contractors to support our business operations. The suppliers Sonoco Flexible Packaging Canada Corporation engages include businesses that produce certain raw material inputs, primarily resinbased films, adhesives, and ink for its flexible based packaging.

In addition, other Sonoco entities are suppliers and customers of Sonoco Canada Corporation and/or Sonoco Flexible Packaging Canada Corporation. Further information about Sonoco businesses can be found in SPC's Annual Report on Form 10-K, subsequent Quarterly Reports on Form 10-Q, its other filings with the U.S. Securities and Exchange Commission, and its website at www.sonoco.com.

3. Our Policies

Policies

Through SPC's organizational and governance policies, we communicate our values and expectations, setting a high bar for ourselves, our suppliers, and our selling partners, and make it clear that we do not tolerate any forms of forced or child labour in any of our operations or those of our suppliers. We make diligent efforts, including through carrying out due diligence and audits to monitor the performance of our suppliers, to prevent our activities from having a negative impact on human rights. Our relevant policies are discussed in further detail below:

Policies on Business Conduct

We are committed to conducting our business in a lawful and ethical manner. Our Policies on Business Conduct (the "Policies") are the foundation of our companies' policies and set out guiding principles on professional conduct and establish that Sonoco employees should always act lawfully, ethically, and in the best interests of Sonoco in performing their job duties. Sonoco is committed to the core values of honesty, integrity, and accountability. This commitment requires that employees and directors of Sonoco comply fully with all laws, rules and regulations that apply to Sonoco's business operations, and that they act honestly and ethically. Our Policies are available on our website at https://investor.sonoco.com/static-files/624dda41-23be-498f-8418-9548e4445d49.

Supplier Standards

Sonoco's Supplier Standards detail the requirements and expectations we have of our suppliers, their supply chains, and any of their contractors with whom we engage. We expect our suppliers to comply with all applicable legal requirements in the jurisdictions in which they operate and to consistently monitor and enforce our Supplier Standards in their own operations and supply chains. Our Supplier Standards also set forth our principles of environmental awareness, non-discrimination, diversity, human rights, inclusivity, and accountability. We require our suppliers to commit to our Supplier Standards as a condition of doing business with us.

Sonoco's Supplier Standards confirm respect for human rights as a basic tenet of Sonoco's beliefs, and its commitment to principles including (i) the elimination of forced or compulsory labour and human trafficking, (ii) the establishment and maintenance of fair and safe work environments, and (iii) the requirement that all suppliers operate such that employee working hours are in compliance with local standards as well as local and national laws and regulations of the applicable jurisdiction. Under the Supplier Standards, Sonoco will not work with any suppliers who require employees to work in excess of statutory limitations without proper compensation as required by applicable law. Further, Sonoco condemns all forms of exploitation of children and forbids the use of children in the workforce. Suppliers are forbidden from recruiting child labour, and all supplier employees are required to be above the legal employment age in the country of their employment.

We review our Supplier Standards on a periodic basis to ensure that this policy is in line with current best practices. Our Supplier Standards are available publicly from our website at https://www.sonoco.com/about/supplier-resources/supplier-standards.

Human Rights Policy

Sonoco's Human Rights Policy outlines Sonoco's commitment to respect human rights standards; specifically, those outlined in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labor Organizations Declaration on Fundamental Principles and Rights at Work. Sonoco's Human Rights Policy applies to all operations of the Company, including all divisions, subsidiaries, and affiliated companies as well as all employees, directors, officers, agents, contractors, business partners, vendors, and suppliers of Sonoco. Our Rights Human Policy is available publicly from our website at https://www.sonoco.com/about/supplier-resources/human-rights-policy.

Sonoco's Internal Audit Department conducts periodic risk assessments and monitors Sonoco's compliance with the Human Rights Policy.

Due Diligence

We expect third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties and as part of our process for onboarding potential new suppliers, we take steps to appropriately evaluate the relationship and mitigate associated risks by carrying out risk-based due diligence and checks.

All Sonoco Flexible Packaging Canada facilities and two of Sonoco Canada Corporation's facilities participate in the Supplier Ethical Data Exchange ("SEDEX"), a non-profit organization that helps businesses improve ethical and responsible business practices in their supply chains. Other Sonoco manufacturing locations currently participate in SEDEX with various levels of involvement. In total, across Sonoco globally, approximately 80 individual operations participate in SEDEX. Each of the participants have completed SEDEX's Self-Assessment Questionnaire, and Sonoco is participating in SEDEX Members Ethical Trade Audits ("SMETA") in some locations. Many of Sonoco's customers and suppliers are also members of SEDEX. Sonoco is considering expanding its participation in the SEDEX platform, including SMETA, to further evaluate and assess supply chain risks in the future.

We acknowledge the risk of forced labour or child labour in our facilities and our supply chains. In order to mitigate this risk, we follow a due diligence approach that includes requiring compliance with all Sonoco Policies, as outlined above, internal and third-party audits of Sonoco facilities and operations, and review of SEDEX information and SMETA results.

4. Assessing Our Risk

We recognize that we may be indirectly linked to a risk of modern slavery because of our business activities in the manufacturing and packaging industry, and that certain sectors in our supply chain (including the provision of materials, contractors, and labour) may pose a higher risk of modern slavery. Sonoco has established various policies and procedures designed to identify, assess, and manage supplier risk. To assess the risk of forced labour and child labour in our business and supply chains, we conduct risk assessments and review data provided by customers and suppliers. To identify the business activities with the greatest exposure to these risks, we consider the following factors:

- Reliance on low skilled workforce;
- Presence of migrant workers;
- Long, complex, or non-transparent supply chains; and
- Jurisdictional risks including poverty, conflict, and enforcement of international human rights standards.

Sonoco seeks to manage modern slavery risks through a variety of policies, processes, and practices, which are outlined in this Report.

5. Our Commitments

Steps to Prevent and Reduce Risks of Forced and Child Labour

Sonoco has taken the following steps to prevent and reduce risks of forced and child labour:

- Conducting an internal assessment of risks of forced labour and/or child labour in our operations and supply chains;
- Developing and implementing an action plan for addressing any identified instances of forced labour and/or child labour;
- Gathering information on worker recruitment practices and maintaining internal controls to ensure that all workers are recruited voluntarily;
- Evaluating whether any practices in our operations and supply chains increase the risk of forced labour and/or child labour and addressing any such practices;
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in our operations and supply chains;
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour;
- Developing and implementing child protection policies and processes;
- Developing and implementing anti-forced labour and/or child labour contractual clauses;
- Developing and implementing anti-forced labour and/or child labour standards, codes of conduct and/or compliance checklists;

- Evaluating the development of tailored Human Rights/Modern Slavery training programs to targeted (at risk) employee populations;
- Auditing and monitoring suppliers;
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour;
- Developing and implementing grievance mechanisms; and
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour.

We conducted a 2023 Human Rights Risk Assessment (the "2023 Assessment") to monitor compliance with our Human Rights Policy in accordance with methodologies informed by the United Nations Guiding Principles on Business and Human Rights, the International Labor Organization, and the U.S. Department of State's Bureau of Democracy, Human Rights, and Labor. The 2023 Assessment focused on ensuring the following: (i) fair and safe work environment, (ii) the rights of children and the abolition of child labour, (iii) prohibiting forced or compulsory labour and human trafficking, (iv) non-discrimination, (v) freedom of association and collective bargaining; and (iv) indigenous people's rights. The 2023 Assessment included interviews covering broad topics, including human rights risks and priorities, policy and awareness, risk mitigation efforts and supplier due diligence. In connection with the 2023 Assessment, we also sampled a selection of 20 suppliers to assess the nature and extent of due diligence, onboarding, and procedures as they relate to human rights. This included review of current supplier contracts, attestations of suppliers to the Supplier Standards, recent bidding or due diligence activities, and any publicized human rights violations related to the supplier.

Remediation Measures

Sonoco has not identified any forced labour or child labour in its operations or supply chains in Canada, and therefore, no remediation measures have been taken. If a situation of non-compliance is identified in the future, we are committed to implementing remediation measures to correct the situation and improve the enforcement of our prevention measures within our business and supply chain.

Training

Sonoco requires all employees to acknowledge Sonoco's code of conduct at the time of hiring and requires all salaried employees to participate in annual trainings on Sonoco's code of conduct. Over 99% of Sonoco's salaried employees completed the 2023 annual training. Sonoco is also evaluating the development of tailored Human Rights/Modern Slavery training for targeted (at risk) employee populations.

6. Our Progress and Effectiveness

As part of our governance processes, we monitor compliance with our policies on an ongoing basis. We also review any concerns raised through formal and informal mechanisms of employee feedback. To date no significant concerns or complaints have been identified with respect to Sonoco's Canada operations.

Sonoco intends to conduct another formal Human Rights Risk Assessment in 2025.

7. Approval & Signature

In accordance with paragraph 11(4)(b)(ii) of the Act, this Report was approved by SPC's Board of Directors on May 30, 2024, and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at www.sonoco.com.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for Sonoco Products Company, Sonoco Flexible Packaging Canada, and Sonoco Canada Corporation. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

/s/ Theresa J. Drew

Theresa J. Drew
Director, Audit Committee Chair
May 30, 2024
I have the authority to bind Sonoco Products Company.

FORWARD-LOOKING STATEMENTS

The information in this Report contains "forward-looking statements" within the meaning of Section 27A of the Securities Act of 1933, as amended (the "Securities Act"), and Section 21E of the Securities Exchange Act of 1934, as amended (the "Exchange Act"), which are subject to the "safe harbor" created by those sections, as well as "forward-looking information" as defined in applicable Canadian securities laws. Such forward-looking statements are based on our management's beliefs and assumptions and on information currently available to our management. You can identify forward-looking statements by terms such as "may," "expect," "intend," "potential" and similar expressions intended to identify forwardlooking statements. Forward-looking statements in this Report include, but are not limited to, statements regarding our future due diligence, risk assessment, audit and remediation activities and commitments; our expectations regarding supplier policies and practices; supplier engagement with respect to human rights; and our employee hiring and training practices. By their nature, these forward-looking statements involve known and unknown risks, uncertainties, assumptions, and other factors that may cause actual results to differ materially from those contemplated by the forward-looking statements, including, among other things, risks relating to our ability to complete intended due diligence steps and carry out additional human rights assessments; the timeliness, cooperation, and accuracy of our suppliers in our due diligence and assessment efforts; our ability to identify and mitigate risks in our supply chain; our ability and willingness to use third-party compliance providers; future legal and regulatory; and the other risks and uncertainties discussed in our most recent Annual Report on Form 10-K and Quarterly Reports on Form 10-Q filed with the U.S. Securities and Exchange Commission, including under the captions "Forward-Looking Statements" and "Risk Factors." You are cautioned not to place undue reliance on the forwardlooking statements in this Report. The forward-looking statements contained in this Report represent our estimates and assumptions only as of the date of this Report. Except as may be required by applicable law, we undertake no obligation to update any forward-looking statements, whether as a result of new information, future events, or otherwise.