

2023 Forced and Child Labor Report

Pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"), this joint report (the "Report") describes the steps that Veritiv Operating Company and Veritiv Publishing & Print Management, Inc. (collectively, "Veritiv") have taken to combat forced and child labor in our operations and supply chains for the period from January 1, 2023 to December 31, 2023. The Report also looks forward, describing our plans for measures to prevent and mitigate the risk of forced and child labor for 2024 and beyond.

Introduction

As a global corporate citizen, our responsibility to those working on our behalf goes beyond our buildings' walls and our fleet's reach. We act with integrity and support efforts to protect individual human rights throughout our operations and supply chain. We comply with the laws and regulations of the states, provinces and countries in which we operate as well as with agreed upon customer requirements. We also conduct our business operations in ways that seek to respect, protect and promote the full range of human rights. Veritiv is committed to high standards of social and environmental responsibility, ethical conduct, and strives for continuous improvement. We do not tolerate human rights abuse in any of our operations or anywhere in our supply chain.

Our Business

From our headquarters in bustling Atlanta to our distribution centers spanning the U.S. and Mexico, Veritiv delivers value-added packaging, paper and print, and facility solutions. More than just a distribution company, we're a strategic partner in unleashing the supply chain's full potential. What sets us apart is our people—a vibrant community of dedicated individuals passionate about exceeding expectations. With a focus on innovation and customer satisfaction, our team tackles complex challenges with enthusiasm.

Veritiv puts decades of industry knowledge, expertise, and proven supply chain ingenuity to work across numerous industries and businesses, supporting over 50% of today's Fortune 500® companies. We understand the intricate needs of sectors from food to pharmaceuticals to aerospace and tailor our solutions to fit industry-specific requirements. Whether it's staying up on the latest trends, controlling costs during market and supply chain shifts, or sourcing products with the latest sustainable materials, Veritiv provides quality, safe, and cost-effective solutions.

- **Packaging:** We work directly with customers to build solutions that address their complex supply chain needs. Our value-added services, including design, kitting, testing, and international sourcing, make us North America's leading provider for concept-to-delivery packaging needs.
- **Print Products and Solutions:** Veritiv leverages our global network of world-class suppliers and well stocked distribution centers to deliver locally to customers in commercial print, publishing, and end-user segments. Our experts provide paper and print solutions wherever and whenever needed.
- **Facility Solutions:** A clean, healthy, and productive facility shows employees and customers you care. Veritiv offers many cost-effective commercial cleaning services and supplies, including sustainable options. We have the expertise and sourcing capabilities to serve customers across a wide range of industries, including office buildings, manufacturing, higher education, healthcare, government, food service, and hospitality.

Supply Chains



Our sourcing strategy is to thoroughly vet and approve suppliers we have close relationships with, driving preferred suppliers. Doing so allows us to better measure and manage supply chain risk with regard to ESG factors. We work with large, well-established, new, and niche suppliers who provide innovative, cutting-edge, sustainable, and responsibly sourced products.

Veritiv identifies suppliers based on the quality, cost, and reliability of their products. Equally important in that selection process is ensuring each potential supplier demonstrates the highest standard of ethical business conduct. We will never knowingly do business with suppliers or vendors that operate in a manner that violates our [Veritiv Code of Business Conduct and Ethics](#) (the “Code of Conduct”) or other applicable laws or regulations, including environmental, employee, and safety laws.

Policies and Due Diligence Processes

Our strong corporate governance management system establishes, monitors, and enforces ethical, responsible actions. Veritiv’s Board of Directors (the “Board”) provides direction and advice to the Senior Leadership Team (“SLT”) and is responsible for strategic direction and company stewardship. As part of our company strategy review, the Board and management annually assess corporate governance practices, policies, environmental and social risks, and opportunities.

Human Rights Policy Statement

Veritiv’s [Human Rights Policy Statement](#), which is closely aligned to the principles of the [United Nations Guiding Principles on Business and Human Rights](#), seeks to ensure the direct and indirect impacts of our operations on employees and external stakeholders uphold universally accepted principles of human rights. And we expect the same from our suppliers and vendors. This includes ensuring all businesses in our supply chain:

- **PROVIDE:** Fair living wages and pay for all time worked in compliance with all local laws, safe working conditions, and equal employment opportunities
- **PROHIBIT:** Child and forced labor, human trafficking, modern day slavery, harassment, and discrimination.

Our policies, standards, and practices, including the Veritiv Code of Conduct, underscore our values. We hold our suppliers and vendors to these same values through our [Supplier Code of Conduct](#).

Veritiv Code of Conduct

We recently refreshed our Code of Conduct to make it easy-to-read and interactive as it provides guidelines, tools, and resources to empower our employees to make business decisions consistent with our values.

Our Code of Conduct is a set of standards that govern how we are expected to conduct ourselves, make business decisions, and handle potential ethical dilemmas. An instruction manual that builds upon our Veritiv CODE of Values, the Code of Conduct guides how we do business ethically, responsibly, and in compliance with the law. The Code of Conduct goes beyond simply just following the law. It ensures we are making decisions and following through in a way that reflects the high value we place on integrity, honesty, fair dealing, and consistent ethical business practices. Honesty and integrity, both essential parts of our corporate culture, are at its core. The Code of Conduct sets us up for success—getting to what matters most by doing the right things right.

The Code of Conduct provides a foundation for our daily decisions and how we accomplish our jobs. It is an important tool for cultivating and maintaining an ethical workplace where employees do the right thing. We rely on our employees’ good judgment and ability to speak up if something is unclear.

Supplier Code of Conduct

Veritiv expects suppliers to comply with the Supplier Code of Conduct, as well as the Veritiv Code of Conduct, and all applicable laws and regulations. Our Supplier Code of Conduct focuses on the following ethical sourcing areas:

- 1. Workplace, Labor, and Human Rights:** Veritiv's commitment to protecting human rights is outlined in our Human Rights Policy and our Supplier Code of Conduct. We select suppliers who embrace our Veritiv Values and expect our suppliers to be accountable to social impact requirements.
- 2. Health and Safety:** We require our suppliers to provide secure, safe, healthy workplaces, have well-established safety procedures, utilize preventive maintenance and protective equipment, and comply with all applicable laws.
- 3. The Environment:** Suppliers must comply with all applicable environmental laws, including hazardous materials, wastewater, solid waste, and air emissions.
- 4. Business Ethics:** We expect our suppliers to operate with the highest business ethics and specifically note compliance with antibribery, conflicts of interest, antitrust, intellectual property, data privacy laws, and all applicable laws of the countries where the supplier operates.
- 5. Accountability, Compliance and Reporting:** Suppliers must monitor and document that their entire supply chains comply with our Supplier Code of Conduct and applicable laws and regulations. We maintain the right to audit our suppliers' compliance with the Code and utilize the supplier assessment process described below. We may void or terminate contractual obligations with a supplier for non-compliance.
- 6. No Retaliation:** Suppliers must assure their employees and others in the supply chain will not be penalized for good faith reporting of suspected violations of our Code, applicable laws and regulations, or for cooperating with any related investigation. Retaliation or threats of retaliation against any person who reports a possible violation or cooperates with any related investigation will not be tolerated.

Reporting Suspected Violations

We encourage reporting ethical concerns or complaints regarding the company or individual practices. A third party maintains our confidential helpline available in all local languages, 24 hours a day, seven days a week. Individuals in North America may call the secure helpline (888-312-2693 in the U.S. and 800-462-4240 in Mexico). A global reporting website is available at veritivhelpline.com.

Veritiv does not tolerate retaliation, and those who report can do so without fear of retribution, retaliation, or unfair, adverse effects on their jobs. Anyone who discourages or prevents a fellow employee from making a good-faith report is subject to disciplinary action. All potential violations reported through the helpline are investigated by our Human Resources team and/or other appropriate senior leaders, and proper action is taken based on the findings. The Board receives a summary report of all matters reported via the helpline and other available channels, such as our Human Resources and Legal departments.

Chain of Custody Certification

Chain of Custody (COC) certification is an important mechanism for verifying that forest products and the labor used in producing those products are managed responsibly. Veritiv manages three COC certification programs: FOREST STEWARDSHIP COUNCIL® (FSC®), PROGRAMME FOR THE ENDORSEMENT OF FOREST CERTIFICATION (PEFC) and SUSTAINABLE FORESTRY INITIATIVE® (SFI®). These certifications strengthen supply chain assurance and the connections between sustainable forests, traceability, and responsible wood fiber product sourcing.

Forced Labor and Child Labor Risks

We recognize that forced and child labor are pervasive challenges for supply chains across industries and around the globe. Veritiv has international operations and is a distributor of packaging, print and facility solutions products, some of which are sourced from international suppliers and manufacturers. We are undergoing ongoing evaluation of the risk of forced or child labor being used.

Our supplier assessment is based on environmental and social practices. We track all supplier metrics with the Supplier Sustainability Scorecard in PowerBI, where we have evaluated our top suppliers, representing more than half of our Packaging and Facility Solutions supplier spend. We have integrated risk evaluation into overall supplier KPI tracking, including the percentage of targeted suppliers that have signed sustainable procurement charters. Veritiv's Quality Assurance and Category Management teams collaborate to integrate risk-based thinking based on the assessment results.

We perform desktop audits, as well as on-site audits in Mexico and the U.S., as needed. The scope of these audits includes management systems, social responsibility, and environmental and quality system topics. Capacity building for suppliers is done through surveys, such as the Quality Survey that addresses documented processes, including escalation of identified issues, as applicable. We work with our supplier partners to resolve the nonconformities by issuing corrective actions focusing on improvement.

Supplier non-compliance is managed through collaboration. Veritiv employs a cross-functional team to partner with the supplier to ensure that the problem is resolved and that creative and innovative solutions can be utilized for improvement opportunities.

Remediation Measures

Reporting unethical and unlawful behavior is vitally important to Veritiv's business and reputation and it is something we take very seriously. Reporting a potential violation is always the right thing to do. We encourage employees to speak up, ask questions, and express concerns without fear of retaliation. Reports of suspected Code violations will be investigated according to the following procedure:

1. Upon receiving a concern, Veritiv will promptly select a subject matter expert who will thoroughly investigate all reports of possible Code of Conduct violations.
2. Employees and other individuals reporting concerns will be expected to cooperate in the investigation where needed. This includes speaking with investigators and providing truthful, complete, and accurate information.
3. Details of the investigation will be kept as confidential as possible. However, it may sometimes be necessary to disclose details to others to help investigate, identify, or resolve the issue.
4. If any portion of the reported concern is substantiated, the investigator and a member of Human Resources (if Human Resources was not the investigator) will make a recommendation regarding any proposed actions to address the issue.
5. After the investigation is concluded, the individual reporting the concern will be informed whether the allegation was substantiated. Additional details regarding the investigation, the outcome, and any actions taken will usually not be shared with the individual or individuals who filed the report.

Remediation of Loss of Income

Veritiv has not identified any forced or child labor in our operations or supply chains. We have not yet implemented measures to remediate the loss of income to the most vulnerable families, if we uncover forced or child labor in our continued evaluation of our supply chains. In the event we identify forced or child labor, we will consider remediation measures, where appropriate, as part of implementing our response.

Training

Our Code of Conduct is essential for cultivating and maintaining an ethical workplace where employees do the right thing. Code of Conduct training covers the purpose of our Code of Conduct, employee and manager responsibilities, and resources for anonymous reporting of actual or suspected grievances, including a reporting hotline. The training is required for all employees to ensure they understand our values and ethical business standards. In 2023, 4,428 Veritiv employees (98%) completed an aggregate of 1,670 compliance-related training hours.¹

Beginning in 2022, Veritiv partnered with the Federal Motor Carrier Safety Administration (FMCSA) to participate in the Truckers Against Trafficking training and certification program. The impact of human trafficking has become evident to Veritiv as the City of Atlanta, the home of our corporate headquarters and one of the busiest airports in the country, has spotlighted the problem in our own community. We believe that Veritiv can play a leadership role in the fight against human trafficking as we maintain a large commercial fleet with drivers traveling throughout the U.S. and Mexico.

Training for the Truckers Against Trafficking program has been created and implemented for all Commercial Motor Vehicle (CMV) Drivers and Service and Equipment Technicians. Through the focused efforts of our Transportation Safety Team, 100% of Veritiv Drivers and Service Technicians have completed the training and certification process. All new hire Drivers and Techs receive training as part of the onboarding process, and annual training for recertification has also been implemented. Veritiv is proud of the way our employees have embraced this effort.

Assessing Effectiveness

After reviewing hundreds of customer data requests regarding our environmental, social, and governance performance, our SLT addressed issues most important to meeting our customers' needs and expectations. Additionally, the SLT engaged in discussions with our Board, leaders, and broader employee groups and worked with outside advisors regarding diversity, equity, and inclusion (DE&I), community, and social priorities.

We plan to complete a materiality assessment to validate our current strategy, mitigate potential business risks, and capitalize on opportunities. We are working to identify a third-party partner to complete the materiality assessment and analysis.

Veritiv also responds to various assessment and rating systems, such as EcoVadis, CDP, and Sedex. We also conduct third-party audits at select facilities, including Sedex Member Ethical Trade Audits (SMETA), which seek to validate our policies and procedures to ensure we uphold the rights of all employees.

These efforts, along with many other initiatives, resulted in Veritiv being awarded a Bronze Medal from EcoVadis, which recognizes companies that have completed an assessment process and demonstrated a strong management system addressing key ESG criteria. Veritiv was ranked in the top 14% of companies rated by EcoVadis in our industry.

Our Plans for 2024 and Beyond

We have identified the following as potential next steps to enhance our knowledge of the risks of forced and child labor in our business and supply chains, to build upon our commitment to prevent forced and child labor and to eradicate it, where it exists:

Areas	Actions
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¹ This data represents cumulative hours across all compliance trainings and is not limited to Code of Conduct training.

Risk Assessment and Evaluation	Expand our global supplier risk assessments to more intently focus on forced and child labor risks.
Due Diligence and Stakeholder Engagement	Develop more robust internal and external forced and child labor audits. Complete a materiality assessment. Evaluate how to use supplier KPIs to measure effectiveness of efforts to prevent and identify forced and child labor.
Training	Set training targets and implement more comprehensive trainings on forced and child labor to the Board, Senior Leadership Team and employees.
Remediation	Develop remediation measures and processes.

Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the 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.



Name: Susan Salyer_
 Title: SVP, General Counsel and Corporation Secretary_
 Date: May 31, 2024