



Slavery and Human Trafficking Statement

This statement is made by Eviosys Packaging UK Limited ("Eviosys") on its own behalf and on behalf of the associated companies in the Group. It is a statement made in accordance with section 54 of the Modern Slavery Act 2015 and covers the financial year from 1 January 2022 to 31 December 2022.

Within this statement "Business Partners" means any joint venture partner, affiliate, distributor/dealer, agent, consultant, or any other third party engaged to act on behalf of Eviosys in commercial matters. Business Partners do not include vendors providing commodities of a modest value or routine office services.

Who are we?

For those unfamiliar with our business and to aid an understanding of this statement, we have summarised our key activities and supply chains below:

Eviosys was launched on 1 September 2021. Our group offers unrivalled quality and excellence based on 200 years' experience in the packaging industry. Innovation and sustainability is at the heart of our brand.

Eviosys helps businesses protect their reputation and boost the impact of their brand. We provide smart sustainable packaging that enhances the appeal of our customers' brands in everyday life. We collaborate with our customers to protect their products, preserve their brand reputation, promote their brand image and create sustainable packaging that protects the planet, people and our communities.

We are part of the supply-chain in the food industry, which provides continuous access to canned food under critical circumstances to populations around the world. In addition to manufacturing containers that provide the maximum protection to nutritious food, we also manufacture closures for baby food, aerosol containers for cleaning and sanitizing products. We are committed to working with our Business Partners to ensure that as an organisation we respect the human rights of everyone we engage with. Human rights issues are reviewed in our annual reporting and publicly reported in our annual ESG report.

Eviosys, headquartered in Zug (Switzerland), is operating in 45 plants across 18 countries and 7 regions (UK-Ireland, France-Belgium, Greece- Italy-Turkey, Portugal-Spain, Germany-Poland-Hungary, Morocco-IvoryCoast-Ghana-Madagascar, Russia-Thailand). In 2022, the average permanent headcount was around 7000 employees, the average flexible (temporary contracts and agency contracts) headcount around 700 people.

These 7700 people belong to several headcount categories:

- 1) employees directly involved in the manufacturing lines (49% of the workforce),
- 2) employees working around the manufacturing lines (29% of the workforce),
- 3) employees who deal with the management of a plant/site (14% of the workforce),
- 4) employees responsible for sales in a plant (2%),
- 5) employees dealing with general services and administration, not necessarily linked to a plant (5%),
- 6) employees working in the R&D department (1%).



The first two categories are typically referred to as blue collar employees, the others as white collar employees.

In Eviosys, manufacturing peaks differ from plant to plant depending on the customer and the product. Some plants have a very levelled production throughout the year, some other plants have seasonal impacts which is managed through the flexible workforce.

Eviosys plants source most of their raw materials from EU and UK suppliers – EU mills for aluminium and EU + UK mills for 85% of the tinsplate bought. For Lacquers and Coatings too, supply is sourced from the EU and UK. A small portion of the tinsplate is sourced from mills outside of the EU in Serbia, China, Japan, Taiwan or Korea, either directly or through traders. This represents over 70% of our total purchases including energy.

For other goods and services, such as packaging, consumables, spare parts, cleaning services, warehouse rental, transport, equipment and machinery, temporary work, etc. we have over 10 000 suppliers of all sizes, from whom we purchase either directly (manufacturers) or through distributors (e.g. for spare parts). Most of these suppliers are local, i.e. based in the country where our plants operate, so the large majority of these suppliers will be located in the EU and UK, although we also have a few plants in Africa (e.g. Morocco), Russia and Turkey.

Since Eviosys was founded we have been recertified for ISO standards, SEDEX, BRC and others. This was an extensive effort made by all Eviosys personnel involved. It allowed us to adapt, update and renew all our policies, directives and procedures at corporate level. Eviosys became fully certified just a few months after its launch. As a signatory to the UN Global Compact, our sustainability priorities are aligned with the UN sustainable development goals so that our actions can contribute to a greater collective impact.

Our Pillars

Our environmental, social responsibility and corporate governance pillars are aligned with the UN sustainable development goals.

Building on our rich heritage, we have developed a clear seven-year strategy, underpinned by three core pillars:

- Protecting the environment with our products and in our operations is in our DNA
- Our social responsibilities include the safety of employees, progressive working conditions and managing relationships with local communities, suppliers and customers for everyone's benefit
- Our corporate governance policy includes everything we do, to ensure ethical and positive leadership of the company.

We have summarised within this statement the steps that we have taken since our launch in respect of our governance obligations. We would, however, invite you to read our full 2021 Environment, Social and Governance report which can be reviewed here: [Preserve Together \(heyazine.com\)](https://www.eviosys.com/PreserveTogether)

Full Compliance, Conduct and Ethics

A Culture of Compliance

Eviosys is committed to acting ethically, with integrity, and in compliance with applicable laws, in all our business dealings. We are not an organisation that prioritises business at any cost, and we ensure that at all times we are acting in a responsible way that is in accordance with our values.

Eviosys has implemented a robust Compliance Programme, which has been designed to protect and promote ethical business operations and to assure uniformity in standards of conduct. Through a



system of controls, the Programme helps to provide reasonable assurance that the Company and each representative acting on our behalf, complies with applicable law and manages the risks associated with our business.

The Programme helps to maintain a culture of compliance to achieve this goal by focusing on the following objectives:

- Participation of each employee in day- to-day vigilance to identify and address potential compliance issues.
- Providing regular awareness and compliance training so that personnel understand their obligations and applicable laws covered by the Programme.
- Implementation of a system of monitoring, auditing, and reviewing the Programme.
- Execution of procedures for reporting suspected violations of the Programme, investigating suspected violations, and implementing corrective action, including, when appropriate, disciplinary action.

The details, components and scope of Eviosys' Compliance Programme are detailed in our Compliance Charter. The Compliance Management Committee ("Committee"), which is comprised of the Chief Executive Officer, the Chief Financial Officer, and the Compliance Officer ("CO"), maintains oversight of compliance operations. The Committee is responsible for ensuring implementation of the Programme, providing adequate resources and support for the Programme, and employment and management of appropriate personnel to administer the Programme on a day-to-day basis.

The Committee relies on specialized external counsel for the implementation of the Compliance Programme as appropriate.

The centrepiece of Eviosys' Compliance Programme is the Code of Business Conduct and Ethics (the "Code"), which applies to all company employees, and others acting on Eviosys' behalf (including Business Partners). Eviosys also maintains compliance policies to address specific ethical, legal, and regulatory concerns, and to ensure representatives abide by the same standards to which we hold ourselves.

We expect all staff to read and understand our Code. All employees joining Eviosys receive as part of their welcome package a copy of the Code, which they should sign and familiarise with its content and their responsibilities thereunder. As part of our mandatory annual Anti-Bribery and Corruption training, all employees are required to read and accept the terms of our Code.

Eviosys has recently implemented an ethics hotline, through which Employees are encouraged to report behaviours that are inconsistent with our Code and other compliance Policies. Reports may also be made through their supervisor, or to the Compliance Officer or the Legal Department.

Available globally in 15 languages, employees, suppliers and agents are able to raise their concerns anonymously and confidentially and be confident that their concerns will be promptly and thoroughly investigated by an independent third party. The availability of our Ethics Hotline and website is shared regularly with employees through our compliance training and our intranet site.

Employee engagement and awareness of compliance

Alongside regular training sessions, we undertake regular communication activities to build awareness of the importance of compliance with the business. In February 2022, the CEO formally communicated to all employees Eviosys Compliance Programme and employees' obligations and responsibilities thereunder.

Managing our Business Partners

Laws of many countries require that Eviosys be aware of the business practices of its Business Partners. To that end, Eviosys has created specific procedures to minimise the likelihood of bribery



and corruption, and promote compliance more generally with economic sanctions, export controls, anti-money laundering, and other international trade laws.

Before appointing any new Business Partner, the employee responsible for its on-boarding is required to perform a thorough due diligence. No Business Partner is retained until the legal department has confirmed that the necessary due diligence has been completed, the results are satisfactory, and a written agreement is entered into.

Anti-Bribery and Anti-Corruption

Bribery and corruption matters are covered by a section in our Code but also by a separate specific policy. The Anti-Bribery / Anti-Corruption Policy (the "Anti-corruption Policy") applies to all Eviosys companies and employees (whether permanent or temporary), as well as to all representatives acting on behalf of Eviosys (including Business Partners). Our Anti-Corruption Policy covers compliance with all anti-bribery and anti-corruption laws applicable to Eviosys, including the Sapin II Law, the UK Bribery Act, and the U.S. Foreign Corrupt Practices Act (the "FCPA"). Relevant French employees also receive compulsory Anti-Bribery and Anti-Corruption trainings on a regular basis, whereby they are required to review the Policy and certify that they understand and will comply with it and applicable law.

Anti-Trust

Eviosys is fully dedicated to the principles of EU, US and other competition laws and a free and competitive marketplace. At Eviosys, we consider that compliance with competition law is as an absolute necessity of our doing business. Eviosys has a Competition Law Compliance Policy, which aims to educate all our employees on anti-trust matters, and the accepted and prohibited practices in the course of our operations. The Legal Department also organises specific training modules for colleagues whose roles may expose them to competition law risk.

Trade compliance

Our International Trade Compliance Policy outlines our obligations for complying with the export, economic sanctions, and other international trade laws applicable to our business, and sets forth the processes to follow when engaging any transaction with a customer, supplier, counter party or business party in certain countries. This Policy intends to provide corporate oversight of the process. The Policy sets forth specific obligations including, but not limited to due diligence procedures, screening, country risk assessments and product risk assessment.

Code of Business Conduct and Ethics

Eviosys has in place a stringent Code of Business Conduct and Ethics this contains a specific section regarding its expectations in relation to respecting human rights. Stating: *"It is the Company's policy to conduct business in a manner that respects the human rights and dignity of all, and the Company supports international efforts to promote and protect human rights. The Company will not tolerate abuse of human rights in its operations or in its supply chain and is committed to eliminating abuses such as child labor, slavery, human trafficking, and forced labor."*

Supplier Code of Conduct

Eviosys has adopted a Supplier Code of Conduct (the "Supplier Code"), which is informed by its Code of Business Conduct and Ethics and other important public principles such as the United Nations Global Compact, is designed to align the ethical objectives and conduct of all of Eviosys's suppliers, all over the world, with the standards that Eviosys applies to its own personnel. Eviosys expects each supplier to comply with the principles described below, or comparable provisions of its own code of conduct, in all its dealings with Eviosys. Crucially, one key principle is that Suppliers shall not permit



the use of forced or compulsory labor, slavery or human trafficking in their own facilities or in their supply chain.

The Supplier Code is available here: [Eviosys-Supplier-Code-of-Conduct-Jan-2023_EN.pdf](#)

It sets out that Eviosys expects its suppliers to support and respect the protection of human rights and ensure they are not complicit in human rights abuses. Eviosys expects its suppliers to follow universally-accepted employment practices and to prioritize health and safety. In particular, Eviosys requires the following:

- Suppliers shall not employ anyone under the legal working age.
- Suppliers shall not permit the use of forced or compulsory labor, slavery or human trafficking in their own facilities or in their supply chain.
- Suppliers shall provide a workplace free from harassment, including sexual, verbal, physical or demonstrative behavior that creates an offensive, hostile or intimidating environment.
- Suppliers shall not discriminate against current or prospective employees on grounds of race, ethnicity, color, national origin, ancestry, nationality, citizenship, religion, age, gender (including gender identity or expression), sexual orientation, disability, genetic information, uniformed service, veteran's status or any other characteristic protected by applicable law, ordinance or regulation.
- Suppliers shall endeavor to provide a safe work environment in compliance with all applicable laws or, in the absence of applicable laws, best industry practices. Suppliers shall take actions to minimize accidents, injury and illness during the course of work.
- Suppliers shall recognize the rights of freedom of association and collective bargaining under applicable law.
- Suppliers shall comply with all applicable labor laws, including those related to wages, overtime, vacations, absences, disability, maximum working hours and legal right to work.

In summary, the Supplier Code requires suppliers, which includes any third party with whom Eviosys has an active commercial relationship for the supply of goods or services, to comply with the principles of the Supplier Code in relation to:

- Compliance with law (words and spirit);
- Human Rights, Employment Practices, Health & Safety (further detail above);
- Environment;
- Business Integrity and Anticorruption;
- Conflicts of Interest;
- Confidentiality;
- Intellectual Property Protection;
- International Trade;
- Data Protection;
- Origin Mapping;
- Financial Controls.

The Supplier Code includes measures to ensure accountability and compliance with it.

Human Rights Policy

Eviosys has put in place a Human Rights Policy which is being reviewed in the financial year 2023 and will be re-launched all employees so that they are informed, understand and can put the Human Rights Policy into practice in the scope of their employment.

This Policy confirms that it would never directly or indirectly force employees to work for us against their will, nor would we buy from or sell to any organization known to condone forced labor. It also



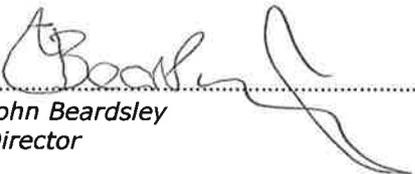
confirms that we would never recruit child labor (as per ILO Labour standards), nor would we buy from or sell to any organization known to condone such practices.

Training

To raise awareness of slavery and trafficking and of our policies and procedures, during the financial year 2023 we are reviewing what training would be appropriate.

Signed by:

This statement has been approved by the board of directors who will review and update it annually.


.....
John Beardsley
Director

This statement has been approved by the Group's Chief Administrative Officer


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Laurent Watteaux
Chief Administrative Officer