



Slavery and Human Trafficking Statement

This statement is made by Sonoco Metal Packaging Limited ("Sonoco") 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 2024 to 31 December 2024.

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 us 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 Packaging UK Limited was launched on 1 September 2021. Our group offers unrivalled quality and excellence based on 200 years' experience in the metal packaging industry. Innovation and sustainability are at the heart of our brand.

In December 2024, Eviosys joined the Sonoco family to become Sonoco Metal Packaging UK Limited.

We help 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 produce ends, aerosol cans, metal closures and promotional packaging for numerous consumer brands. 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.

We are headquartered in Zug (Switzerland) and in 2024 operated in 46 plants across 17 countries. In 2024, the average permanent headcount was around 6,400 employees. We have in the region of 1,000 customers in over 87 countries.

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.

Since we were founded, we have been recertified for ISO standards, SEDEX, BRC and others. This was an extensive effort made by all personnel involved. It allowed us to adapt, update and renew all our policies, directives and procedures at corporate level. We became fully certified just a few months after its launch. In 2022, we became a signatory of the UN Global Compact corporate responsibility initiative and its principles in the areas of human rights, labour, environment and anti-corruption. As part of our commitment, we disclose on an annual basis our company's continuous effort to integrate the Ten Principles into our strategies and operations, and contribute to the United Nations goals. We also support and align our strategy with the UN Social Development Goals (SDGs).

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 are excited to share our continued progress in sustainability as highlighted in our **2024 ESG Report** now available here: [Sonoco Metal Packaging EMEA ESG 2024 report](#).

Key achievements in 2024

1. **Continued Emissions Reduction:** We have continued to achieve reductions in GHG emissions from 2020. Our goal is a 50% reduction by 2030, and in 2024 we saw a reduction of 26.3%.
2. **EcoVadis Platinum Recognition:** We received the Platinum award from EcoVadis for the second year in a row, placing us in the top 1% globally, with another perfect score in environmental stewardship.
3. **Innovations and Upgrades:** We expanded our award-winning Orbit™ range with the introduction of the 66mm diameter format. Further, we introduced a new version of Horizon™, our ultra-light metal overcap which is a fully recyclable alternative to plastic closures. This latest version achieves a 30% reduction in CO2 emissions compared to its predecessor.
4. **Renewable Energy:** We expanded the use of on-site solar energy across several key locations, contributing nearly 3,000 tonnes of CO2e in annual savings. There are further plans to install more solar panels in 2025.
5. **Reducing Energy Consumption:** We are actively reducing energy consumption across our operations through smarter, more efficient technologies. As of 2024, 80% of our lighted sites are equipped with LED lighting, delivering up to 100 tonnes of CO2e savings per plant per year. Further, we also introduced new generation chillers and smart compressors.
6. **Continued Safety Record:** Our Total Recordable Incident Rate (TRIR) has continued at 0.9, reflecting our strong commitment to a safe working environment.
7. **Employee Engagement:** Our employee satisfaction score has increased to 69, demonstrating our efforts to improve employee engagement.
8. **Recognition for Product Innovation:** Our Ecopeel™ solution, launched in 2023, won both the Gold Medal in the Food Three-Piece category at The Canmaker Can of the Year Awards and the Oscar de l'Emballage in France. This lightweight easy to use can cuts CO2 emissions by 20% versus a standard 3 piece can. Also recognised at the Canmaker Can of the Year Awards in 2024 was Horizon™ which received a Bronze Medal in the Prototype category.



Compliance, Business Conduct and Ethics

Our objectives:

- Establish and maintain a culture of compliance, with every employee trained and engaged.
- Encourage employees to report unethical behaviour and assess ethical concerns with neutrality.
- Ensure that our partners adhere to our Compliance Policies.
- Strictly comply with applicable laws and regulations and ensure that our Business Partners comply with applicable laws and regulations.

Culture of Compliance

We are committed to doing business ethically, with integrity, and in compliance with all applicable laws. We always endeavour to conduct business responsibly and in accordance with our values. To ensure the practice of these commitments, we have implemented a robust **Compliance Programme** designed to define, promote, and ensure (through a system of controls) ethical business operations and uniformity in conduct standards across our company. The programme has four broad objectives:

- Participation of every employee in identifying and addressing potential compliance issues.
- Providing ongoing awareness and compliance training to employees regarding their obligations and applicable laws.
- Implementing a system to monitor, audit, and review the Compliance Programme.
- Implement procedures for reporting and investigating suspected violations of the company's Code of Business Conduct and Ethics, and implementing corrective action, including disciplinary measures if appropriate.

The Compliance Programme and its objectives are overseen by the company's Compliance Management Committee, comprised of the company's CEO, CFO and Compliance Officer, with the support of external counsel, as required. The implementation of the Compliance Programme is managed by dedicated staff members who ensure appropriate training for employees, in line with their respective positions and responsibilities.

Alongside ongoing training sessions, the company's senior management and other staff members communicate the various aspects of the Compliance Programme on a regular basis to build awareness among employees of the importance of compliance within the business. The policies and requirements of the Compliance Programme are outlined and specified in the Code of Business Conduct and Ethics ("the Code"), the centrepiece of the programme. The Code encompasses a series of policies that are applicable to all employees, suppliers, and third-party service providers.

All employees joining us receive a copy of the Code as part of their onboarding process. They are expected to read it, understand it within the context of their functions at the company, and sign it. Employees are also required to read and accept the terms of the Code as part of the company's mandatory annual compliance training.

In 2024, we reinforced our culture of compliance with mandatory training, including the Business Conduct and Ethics course and the Respect & Inclusion Essentials Training Pack, which addresses topics such as anti-discrimination, unconscious bias, harassment prevention and human rights. Participation is closely monitored, and completion is certified to ensure accountability. To this end there was a completion rate of 99.87%

We have an Ethics Hotline as a part of our Whistleblowing system through which employees are encouraged to report behaviour that is inconsistent with the company's Code and other compliance Policies. Reports may also be made through their supervisor, the Compliance Officer, or the Legal department. We continue to actively encourage openness and integrity at every level of the business and these whistleblowing channels provide a secure, confidential way for employees to report concerns without fear of retaliation.

The Ethics Hotline is available in 15 languages across the company's sites. We regularly share the details to access our Ethics Hotline and website with employees through compliance training activities, on our intranet, and on our public website. Accessing the Ethics Hotline enables employees, suppliers and Business Partners to raise concerns anonymously and confidentially. These concerns are investigated promptly and thoroughly by an appointed team.



The number of alerts reported through the Ethics Hotline and whistleblowing system underscores the awareness of the tool among our employees and third parties. We are pleased to confirm that the culture of compliance is well-anchored within the company: none of the alerts reported to the Ethics Hotline has raised a compliance concern. We will continue to publicise the existence of the Ethics Hotline and promote its proper use.

Compliance and Business Partners

The laws of many countries require us to be aware of the business practices of our Business Partners. To that end, we have created specific procedures to minimise the likelihood of bribery and corruption and promote compliance with economic sanctions, export controls, anti-money laundering, and other international trade laws.

Thorough due diligence is required before appointing or onboarding any new Business Partner. The initial vetting of a new Business Partner is done by the employee responsible for the relationship. The legal department must then ensure that the necessary due diligence has been completed, the results are satisfactory, and a written agreement has been signed. The procedures put in place are strictly followed by employees. The company's legal department is regularly informed of any potential developments in transactions with Business Partners that may give rise to compliance concerns.

Anti-Bribery and Anti-Corruption

Bribery and corruption are addressed both in our Code of Conduct and in a dedicated Anti-Bribery/Anti-Corruption Policy ("the Policies"), which applies to all Group companies, employees (permanent and temporary), and representatives acting on our behalf, including Business Partners. The Policy ensures compliance with all applicable anti-bribery and anti-corruption laws, including the Sapin II Law, the UK Bribery Act, and the U.S. Foreign Corrupt Practices Act (FCPA). Early 2025, the Policies, together with the Anti-trust and Whistleblowing Policies were refreshed as part of the integration efforts following the acquisition from Sonoco.

Relevant employees received mandatory anti-trust training accordingly- available in 12 languages. This training includes a review of the relevant policy and requires employees to certify that they understand and will comply with both the relevant and applicable laws. The training is ongoing with a target of 100% completion rate.

Anti-Trust

We are fully committed to a free and competitive marketplace. We comply with the principles of EU, U.S., and other countries' laws regulating competition. We have established a Competition Law Compliance Policy that aims to educate our employees on anti-trust matters, and the accepted and prohibited practices during our operations. Considering the constant evolution of competition law and practice, the company's Legal Department regularly organises specific training modules for colleagues whose roles may expose them to competition law risk. Given the importance and sensitivity of this subject, competition law training is provided by specialised external counsel.

Trade compliance

Our International Trade Compliance Policy outlines our obligations for complying with international trade laws that touch on exports, economic sanctions, and other laws applicable to our business. Our Policy also sets forth the processes to follow when engaging in any transaction with a customer, supplier, counterparty or Business Party in certain countries. This Policy provides corporate oversight of the process, detailing specific obligations including but not limited to due diligence procedures, screening, country risk assessments, and product risk assessment. We constantly monitor its operations to ensure conformity with the ongoing evolution of economic sanctions and trade regulations in force.

Human rights

We are committed to upholding the highest standards of ethics and respect for human rights across all our operations. In 2023, we introduced a Human Rights Policy to support our management, employees, and temporary workers in maintaining these standards.



This Policy is informed by internationally recognised frameworks, including the UN Universal Declaration of Human Rights, the ILO's Four Fundamental Principles and Rights at Work, the UN Global Compact Guiding Principles, and relevant national legislation in the countries where we operate.

In line with the Policy, we launched targeted compliance training modules on human rights in 2024. These concise online trainings were made available to relevant employees and achieved a completion rate of 99.94%. This initiative complemented our broader ethics training efforts, including the Business Code of Conduct training on business ethics introduced in March 2024, which reached a 99.87% completion rate.

Code of Business Conduct and Ethics

We have in place a stringent Code of Business Conduct and Ethics this contains a specific section regarding our 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 labour, slavery, human trafficking, and forced labour."*

Supplier Code of Conduct

We have adopted a Supplier Code of Conduct (the "Supplier Code"), which is informed by our 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 our suppliers, all over the world, with the standards that we apply to its own personnel. We expect each supplier to comply with the principles described below, or comparable provisions of its own code of conduct, in all its dealings with us. Crucially, one key principle is that Suppliers shall not permit the use of forced or compulsory labour, slavery or human trafficking in their own facilities or in their supply chain.

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

It sets out that we expect our suppliers to support and respect the protection of human rights and ensure they are not complicit in human rights abuses. We expect our suppliers to follow universally accepted employment practices and to prioritize health and safety. In particular, we require the following:

- Suppliers shall not employ anyone under the legal working age.
- Suppliers shall not permit the use of forced or compulsory labour, 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 behaviour that creates an offensive, hostile or intimidating environment.
- Suppliers shall not discriminate against current or prospective employees on grounds of race, ethnicity, colour, 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 endeavour 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 labour 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 we have 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.

Signed by:

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

N M Allen

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Nicola Allen
Regional Finance Director UK&I Sonoco

A handwritten signature in blue ink, appearing to read 'Dimitri Van Den Berghe', with a long horizontal flourish extending to the right.

Dimitri Van Den Berghe
VP of Human Resources Sonoco