



# MODERN SLAVERY STATEMENT

EFFECTIVE DATE  
JULY 2023

Novolex is committed to conducting business in an ethical manner and provides this statement in compliance with the requirements the California Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act 2015. We respect human rights and undertake efforts to eliminate abuses. Novolex has zero tolerance for child, slave and illegal, abusive and forced labor or human trafficking anywhere in our operations or supply chains.

## OUR BUSINESS

[Novolex](#) manufactures and sources packaging products made with resin, paper and multiple other bio-based materials for the food, retail, health and industrial markets. We employ more than 10,000 people at 57 manufacturing facilities and in administrative offices in the U.S., Canada, Mexico, the U.K., Ireland, and the Netherlands. We report on our sustainability and ESG efforts annually in line with the Global Reporting Initiative (GRI) and the Containers & Packaging industry standard of the Sustainability Accounting Standards Board (SASB). Our [2022 Novolex Sustainability Report](#) is available online.

## OUR POLICIES AND CODES

Our [Human Rights Policy](#), which was updated in 2023, enshrines our commitment to internationally recognized human rights as defined in the *International Bill of Human Rights* and the International Labor Organization's *Declaration on Fundamental Principles and Rights at Work*, guided by the *United Nations Guiding Principles on Business and Human Rights*, and the *United National Global Compact*. The policy prohibits the use of child labor, forced labor, human trafficking, or modern slavery in our operations and in our supply chains, and supports the elimination of all forms of child and forced labor.

The [Novolex Employee Code of Conduct](#) sets forth our expectations for employee conduct including but not limited to respect and support for human rights. All employees are required to understand, sign, and agree to abide by provisions of the code when they join the company and annually thereafter.

The [Novolex Supplier Code of Conduct](#), which was updated in 2022, requires our suppliers, vendors, and other third-party supply chain partners to abide by all applicable laws and regulations as well as the declarations, covenants and principles noted above. Suppliers are required to acknowledge the Code when they are engaged via the company's supplier management platform and agree to Novolex contractual terms and conditions which include an obligation to adhere to the Code.

The [Novolex Ethics Hotline](#) is included in the employee and supplier codes and provides a fair, accessible, effective and timely grievance mechanism through which modern slavery and associated concerns can be raised by employees, suppliers and stakeholders confidentially and resolved without risk of discrimination, retaliation, or losing access to alternative judicial processes.

## OUR DUE DILIGENCE AND RISK MANAGEMENT PROCESS

To manage potential risks within our supply chain, we use the Intertek Inlight™ end-to-end *Supplier Qualification Operating System* to assess risk factors among suppliers domiciled in high inherent risk countries. High inherent

risk countries are determined by Intertek based on a compilation of country risk scores including the *World Bank Governance Indicators*, the *U.N. Human Development Index*, the *Transparency International Corruption Index*, and the *U.S. State Department Trafficking in Persons Report*. As of July 2023, Novolex sourced from 58 suppliers domiciled in high inherent risk countries. Each was required to complete the Intertek Self-Assessment Questionnaire (SAQ) covering a range of ESG policies and practices, including modern slavery and human trafficking. Suppliers who fall short of compliance based on the questionnaire are required to prepare and complete a corrective action plan. Novolex reserves the right to impose scheduled or for-cause audits. Novolex reserves the right to terminate a supplier's contract if they do not meet the SAQ threshold score for compliance or are not compliant with the Novolex Supplier Code of Conduct.

## TRAINING

Our Human Rights Policy commits us to providing ongoing leadership, resources, training and monitoring for employees, contractors, and suppliers to ensure the effective implementation of our commitments and relevant legislation and requirements, including on modern slavery and human trafficking.

- Our human resource professionals and other applicable personnel are trained on the requirements of the Employee Code of Conduct and relevant policies and procedures designed to prevent modern slavery and human trafficking in our operations.
- Our UK-based business requires key employees to complete periodic training on modern slavery which covers purchasing practices, how to assess the risk of slavery and human trafficking, and how to identify, respond to and escalate issues of slavery and human trafficking within our business and with our suppliers and contractors.
- Our procurement staff receive training on the Supplier Code of Conduct when it is updated and/or when they join the company. In 2022, 68 members of the procurement organization were trained on the updated code.
- Our suppliers are required to agree the Novolex Supplier Code of Conduct and expected to provide training for managers and workers to implement policies and procedures to meet applicable legal and regulatory requirements, including measures designed to prevent modern slavery and human trafficking.
- Our Novolex Ethics Hotline is available to Novolex and supplier employees who have reason to believe that violations of human rights, including modern slavery, are occurring in their workplace.

## MOVING FORWARD

As we grow as a company, we are building a sound foundation to ensure there is no room for modern slavery or human trafficking in our operations or supply chains. We will continue to monitor the rapidly evolving legal and social requirements in the countries where we operate and update our policies and processes accordingly. We will also disclose our progress and performance in our publicly available annual sustainability reports and look forward to engaging our stakeholders on these important issues in the years to come.



Stanley Bikulege

Chairman & Chief Executive Officer



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