



## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### INTRODUCTION & PURPOSE

The purpose of this Modern Slavery and Human Trafficking Statement (the "Statement") is to ensure that Intelligent Packaging Limited Partnership and its subsidiaries (collectively, IPL or the "Company") and all business units comply with the California Transparency in Supply Chains Act (2010), the UK Modern Slavery Act (2015), the Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013 in Ireland, and proposed European Union Forced Labour Regulations as and when they come into effect, and align to OECD Guidelines and other international standards. The Company demands the highest ethical standards within its supply chain and is committed to complying with all local and international anti-modern slavery and human trafficking laws and regulations that may be applicable to its business worldwide.

IPL is committed to conducting a business that is sustainable economically, socially, and environmentally. This underpins our approach to understanding modern slavery and taking all possible steps to address the issue. We continue to grow our knowledge and understanding of where modern slavery exists and how it can infiltrate legitimate business.

This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organization and supply chain.

### ORGANISATION'S STRUCTURE

IPL is a leading packaging provider and is a manufacturer of sustainable packaging solutions used in the food, consumer, agricultural, logistics and environmental markets. IPL has its head office in Dublin, Ireland. IPL has over 2800 employees worldwide and operates in Europe, United States of America, Canada, Mexico and China. Find out more about IPL [here](#) or see our structure chart at Appendix A.

### OUR BUSINESS

The business is highly diversified producing customized thin-wall injection moulded containers, lids, overcaps and custom packaging solutions for branded and private label food and consumer products companies all over the world in this segment. We also manufacture large scale products such as pails, containers and crates for the food and consumer, environmental, retail, agricultural and industrial end-markets and a range of returnable bulk containers for the agricultural sector.

We also provide a full range of wheeled bins and related containers for the waste collection and recycling markets, serving municipalities, waste haulers and large retailers and manufacture temporary interlocking flooring solutions with our MacroTrac matting products which are used in the construction, military, oil and gas, and entertainment events markets.

### SUPPLY CHAINS & SUPPLIER ADHERENCE TO OUR VALUES

We cannot work alone to make advancements in the future of packaging. We collaborate with like-minded resin suppliers to deliver innovative solutions, with a focus on increased levels of recycled resins, and in turn, maximising opportunities in the new plastics economy. We are excelling at this in Europe, where recycled materials are more readily available. In the UK for example, we have incorporated up to 50% recycled plastics into our facilities (using both rPP and rHDPE), and there are many examples where we deliver products containing up to 100% recycled plastics. Learn more about IPL's supply chain commitments [here](#).

In working towards a more sustainable future, collaboration with our suppliers is essential and we must ensure that all of those in our supply chains and business chains comply with our values. We understand our responsibility to prevent, mitigate and remediate where necessary the risks of human trafficking, forced, bonded and child labour; and to respect human rights in our operations and our supply chain - with this in mind each of our suppliers acknowledge as part of our standard terms and conditions that they are in compliance with modern slavery and anti-trafficking legislation in each jurisdiction in which we operate.



## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies and have the following policies in place:

- Code of Conduct
- Anti-Corruption
- Whistleblowing policy

IPL runs annual training on the policies listed above, training is mandatory for all staff to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

It is widely acknowledged that China and Mexico are two countries where a high level of due diligence for slavery and/or human trafficking is required/recommended. IPL currently has operations in both of these countries.

In general, as part of our initiative to identify and mitigate risk we have the following practices in place across all locations:

- a mandatory due diligence questionnaire when scoping potential suppliers;
- we have robust anti-modern slavery clauses in all our supply contracts to ensure suppliers are complying with the appropriate legislation and to provide us with authority to act in-case of a breach; the Company's internal audit team undertakes routine audits of all business activities & manufacturing facilities to ensure compliance with a myriad of responsibilities dictated by local and international law. Both of these individuals have received training on human rights, modern slavery and human trafficking and should they find something suspicious they would report it immediately;
- IPL's whistleblowing procedure is designed to make it easy for team members to speak up if they see something, without fear of retaliation. We use a software-based system with 24/7 helpline and incident management program. This helps identify the initial severity of the concern in order to escalate and address it in a timely manner. Any issues around slavery and human trafficking would be categorized as a "high risk" and the corresponding response would be met with equal attention; and if we suspect a supplier to have lower standards, we may commission an independent investigation or replace the supplier. This monitoring is completed by the Legal and Risk division.

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. IPL runs annual training on its Code of Conduct Policy, which includes Slavery and Human Trafficking specific learnings along with Anti-Corruption Policy training with the overall objective to continue ethical business conduct. Our Code of Conduct Policy sets out that the Company expects its employees (and in turn its suppliers) to operate in accordance with applicable business code of conduct law and to adhere to good ethical practice. Upon completion of the Code of Conduct Policy and Anti-Corruption Policy training each employee is awarded a Certificate of Completion. Training is made accessible to all as it is provided in a number of languages.

All employees and representatives are required to adhere to the relevant business code of conduct and anti-corruption laws applicable in the country where they conduct their business, or where they conduct business on the Company's behalf.

IPL's Anti-Corruption Policy ensures that it is the responsibility of senior management to carry out due diligence on any potential new third parties, contractors or other agents to be engaged by the Company to check if they have a history of involvement in bribery, corruption or other illegal or improper practices.



## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Vetting procedures;
- Supplier screening;
- Facilitating risk mapping with customers;
- Whistleblowing;
- Training; and
- Remedial action.

To date, we have not had to apply human rights remedy within our supply chains. As we grow globally, we are aware that this may become a reality as we begin to investigate further within our supply chains.

We understand that there is always more to be done and we are seeking to ensure that the appropriate safeguards are in place to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This statement constitutes our slavery and human trafficking statement for the financial year ending 31 December 2022, as part of our overall human rights commitment. **It was approved by the board on 9 May 2023.**

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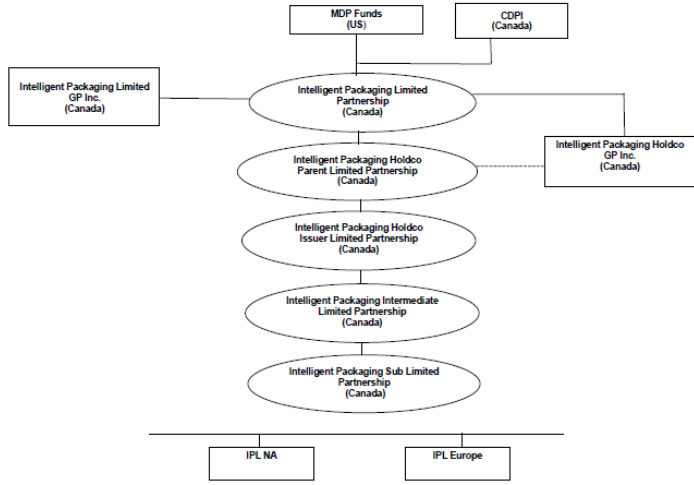
Alan Walsh  
Chief Executive Officer  
Intelligent Packaging Sub Limited Partnership

Date: 09/05/2023



# APPENDIX A

DATE: May 2023  
Boxes: Corporate  
Oval: Limited Partnerships



**General Partnerships:**  
Intelligent Packaging Limited GP Inc. General Partner of :  
Intelligent Packaging Limited Partnership  
Intelligent Packaging Intermediate Limited Partnership &  
Intelligent Packaging Sub Limited Partnership.  
Intelligent Packaging Holdco GP Inc. General Partner of:  
Intelligent Packaging Holdco Parent Limited Partnership  
Intelligent Packaging Holdco Issuer Limited Partnership