

Pregis 2023 Annual Report for the Canada  
Minister of Public Safety



**PROTECT**  
**PRESERVE**  
**INSPYRE**

**Pregis**



This document is being provided as a response to the Canada Minister of Public Safety Bill S-211 Forced Labour in Canadian Supply Chains that came into force in Canada on January 1, 2024.

For an additional resource, please refer to our most recent ESG report at <https://www.pregis.com/sustainable-packaging/2022-esg-report/>

## **Steps taken to prevent and reduce the risk that forced labor or child labor is used at any step of the production of our goods.**

We put controls in place to prevent the creation of business partners located in the Xinjiang Region and added the Uyghur Forced Labor Prevention Act (UFLPA) Entity List to our ongoing monitoring screening software.

Pregis has an organizational-wide Statement of Business Principles with a section covering Code of Ethics, posted on the Pregis website. Additionally, Pregis has the following policies: Global Human Rights, Environmental, Health and Safety, Anti-Corruption, Sustainability, Sustainable Procurement, and Diversity and Inclusion.

We recognize our crucial role within the value chain, from the materials we utilize in our products to the impact that protecting products throughout the manufacturing and transit process plays in helping companies meet their sustainability objectives. We are also keenly aware and passionate about our impact on people, from our employees that are moving us forward to the workers that use our products in their daily processes down to the very consumers that are focused on a healthy planet and future for all.

## **Policies and due diligence processes in place related to forced labor and/or child labor.**

Pregis has a global Labor and Human Rights Policy. Pregis also has an organizational-wide Statement of Business Principles with a section covering Respecting Human Rights. This includes harassment, diversity and equal opportunity, workplace standards, health and safety, child labor, forced labor, and protecting the environment. In addition, there are Equal Employment Opportunity, EEO Harassment, Sexual Harassment and Workplace Violence policies.

## **Pregis has not identified forced labor or child labor risks related to any of our activities and supply chains.**

The risk of forced labor and child labor have been designated as 'low' based on management's assessment of the current supply chain and the activities of related entities. Most of the company's supply chain is in North America, with primary raw materials being sourced almost exclusively from the United States and Canada where strict labor laws and practices at the federal and state levels prevent child and forced labor. The company also operates a smaller segment of its business in Western Europe (<10% of total company revenues, with operations in the Netherlands and the United Kingdom) where the supply chain is largely concentrated in Western Europe. The company requires all buyers (procurement role) to undergo sustainable procurement training and has a robust screening process in



place that evaluates risk based on countries of operation of our suppliers, and where necessary more in-depth supplier due diligence. The company also has a policy regarding sustainable procurement and human rights that explicitly prohibits doing business with any entities that do not have child and forced labor controls.

We ensure compliance with core human rights, child labor, forced/ bonded/ involuntary labor, and freedom of association. Per Pregis' Business Principles, "Pregis is committed to fair labor practices, including laws that protect rights of workers". The Pregis Statement of Business Principles covers the Respect of Human Rights, specifically diversity and equal opportunity, workplace standards, health and safety, child labor, and forced labor (list is not inclusive of all topics addressed).

Specific team members who ensure basic human rights and the effectiveness of our safety programs include our Business Unit leadership team: President, HR, Safety, VPs, all plant supervisors and managers. We also empower team members, supervisors and managers to monitor the effectiveness of our safety trainings and procedures through monthly safety audits, committees and council groups.

The company has robust controls in place as preventative measures. To date, the company has not been required to remediate any forced labor or child labor issues, as there have not been any known occurrences.

Sustainable Procurement has training in place for all buyers which covers responsible supply chain management practices, human rights, business ethics and other related matters. Broader business ethics training is implemented company-wide for all employees across functions. The company uses an online training platform that allows it to leverage professional content and track, manage, and measure compliance across the employee base.

### **Policies and procedures in place to ensure that forced labor and child labor are not being used in our activities and supply chains.**

The company has formal policies in place, preventative measures and processes, systematic and policy-driven controls (including software screening solutions). The company formally prohibits the use of child and forced labor in its supply chain and executes annual risk assessments of suppliers in high-risk countries. The company has had no known occurrences yet continues to remain vigilant in its monitoring and controls to prevent any future issues.