

Pact Group Holdings Ltd
ABN: 55 145 989 644

Modern Slavery Statement 2023



Pact entities covered in this Statement

Headquartered in Melbourne and listed on the ASX, Pact employs ~5,400 people in ~130 locations across 15 countries. Pact has four divisions that work as one across the circular economy.

This Modern Slavery Statement (“**Statement**”) covers the activities of Pact Group Holdings Limited (ABN 55 145 989 644) (“**Pact Group Holdings**”) (a reporting entity under the Modern Slavery Act 2018 (Cth)) (the “**Act**”) for the financial year ending 30 June 2023 (“**Reporting Period**”). This Statement is also made pursuant to section 54(1) of the UK Modern Slavery Act 2015.

This is a joint Statement that applies to the following other group entities (that are also reporting entities for the purposes of the Act and/or the UK Modern Slavery Act 2015):

Pact Group Holdings (Australia) Pty Ltd ACN 107 959 900

Pact Group Industries (ANZ) Pty Ltd ACN 147 260 848

Pact Retail Accessories (Australia) Pty Ltd[^]

VIP Plastic Packaging Pty Ltd ACN 095 313 705

Skyson Pty Ltd ACN 113 852 823

Jalco Group Pty Ltd ACN 075 091 806

Jalco Powders Pty Ltd ACN 092 756 888

VIP Steel Packaging Pty Ltd ACN 095 314 195

Viscount Plastics Pty Ltd ACN 005 647 389

Pact Group Industries (Asia) Pty Ltd ACN 166 188 058

Davmar Investments Pty Ltd ABN 39 609 808 095

Alto Packaging Ltd NZBN 9429034028896

Asia Peak Pte. Ltd.

VIP Plastic Packaging (NZ) Limited NZBN 9429035821724

Pact Group (NZ) Limited NZBN 9429037054298

Pact Group Holdings (NZ) Limited NZBN 9429031835831

Pact Group Holdings (Hong Kong) Limited BRN 68533786

Fast Star International Holdings Limited BRN 39269114

Ningbo Xunxing Trade Co. Ltd[^]

[^] reporting entities only pursuant to UK Modern Slavery Act 2015.

as well as their controlled entities (as outlined in section 2 of this statement).

For the purposes of this Statement, any reference to “**Pact**”, “**we**”, “**us**”, “**our**”, “**the group**” or “**our group**” is a reference to each of the above reporting entities (and any entity controlled by the reporting entities).

Pact's commitment

Pact recognizes the harm caused by modern slavery in its various forms including servitude, human trafficking, forced labour, debt bondage, child labour, deceptive recruiting and forced marriage. Pact has a zero-tolerance approach to modern slavery and supports the need for organisations and individuals to take action to reduce and ultimately eradicate the use of modern slavery practices globally.

The purpose of this Statement is to outline Pact's approach to reduce the risk and harm of modern slavery in its operations and supply chain by implementing processes to identify, assess and ultimately remediate modern slavery risks in Pact's operations and supply chain. This Statement highlights the key activities we have undertaken during this Reporting Period to combat modern slavery in our organisation and supply chain.

Pact is committed to acting with integrity. Pact seeks to demonstrate high ethical standards across the group and is committed to the continuous and active implementation of processes to reduce the risk of all forms of modern slavery arising in its supply chain.

Pact's structure, operations and supply chain

Pact Group Holdings is a publicly listed company, incorporated and domiciled in Australia under the *Corporations Act 2001* (Cth). The group is headquartered in Melbourne, Australia. Pact has approximately 5,400 employees across 130 locations, with operations in 15 countries around the world. Pact's vision is to lead the circular economy through packaging, reuse and recycling solutions.

For the purposes of this Statement, the entities owned or controlled by the Pact reporting entities for the Reporting Period (**'controlled entities'**) are as follows:

Australia		
Pact Group Industries (ANZ) Pty Ltd	Jalco Australia Pty. Limited	Skyson Pty. Ltd.
Pact Group Holdings (Australia) Pty Ltd	Jalco Automotive Pty. Limited	Snopak Manufacturing Pty Ltd
Pact Group Finance (Australia) Pty Ltd	Jalco Care Products Pty Limited	Steri-Plas Pty Ltd
Pact Group Industries (Asia) Pty Ltd	Jalco Cosmetics Pty. Limited	Sulo MGB Australia Pty Ltd
Alto Manufacturing Pty Ltd	Jalco Group Pty. Limited	Summit Manufacturing Pty Ltd
Alto Packaging Australia Pty Ltd	Jalco Plastics Pty. Ltd.	Sunrise Plastics Pty. Ltd.
Astron Plastics Pty Limited	Jalco Powders Pty Limited	Synergy Packaging Pty Ltd
Australian Pharmaceutical Manufacturers Pty Ltd	Jalco Promotional Packaging Pty. Limited	VIP Drum Reconditioners Pty. Ltd.
Baroda Manufacturing Pty Ltd	MTWO Pty Ltd	VIP Plastic Packaging Pty Ltd
Brickwood (Dandenong) Pty Ltd	Packaging Employees Pty Limited	VIP Steel Packaging Pty Ltd
Brickwood (NSW) Pty Ltd	Pact Retail Accessories (Australia) Pty Ltd	Viscount Logistics Services Pty Ltd
Brickwood (QLD) Pty Ltd	Pascoe's Pty Ltd	Viscount Plastics (Australia) Pty Ltd
Brickwood (VIC) Pty Ltd	Plaspak Closures Pty Limited	Viscount Plastics (China) Pty Ltd
Cinqplast Plastop Australia Pty Limited	Plaspak Management Pty Limited	Viscount Plastics Pty Ltd
Davmar Investments Pty Ltd	Plaspak Pty Limited	Viscount Pooling Company Pty Ltd
Inpact Innovation Pty. Ltd.	Power Plastics Pty. Limited	Viscount Pooling Systems Pty Ltd
	Ruffgar Holdings Pty Limited	Viscount Rotational Mouldings Pty Ltd
	Salient Asia Pacific Pty Ltd	Vmax Returnable Packaging Systems Pty Ltd
New Zealand		
Pact Group Holdings (NZ) Limited	Alto Packaging Limited	Pacific BBA Plastics (NZ) Limited
Pact Group Finance (NZ) Limited	Auckland Drum Sustainability Services Limited	Viscount Plastics (NZ) Limited
Pact Group (NZ) Limited	Viscount FCC Limited	Stowers Containment Solutions Limited
VIP Steel Packaging (NZ) Limited	Tepak Industries Limited	Sulo (N.Z.) Limited
VIP Plastic Packaging (NZ) Limited	Astron Plastics Limited	Pact Retail Accessories (New Zealand) Limited
Hong Kong		
Pact Group Holdings (Hong Kong) Limited	Pact Retail Accessories (Hong Kong) Limited	Talent Group Development Limited
Roots Investment Holding Private Limited	Pact Retail Accessories (Asia) Limited	Fast Star International Holdings Limited
China		
Guangzhou Viscount Plastics Co., Ltd	Pact Group Closure Systems (Tianjin) Co., Ltd)	Regent Plastic Products Ltd
Langfang Viscount Plastics Co., Ltd	Pact Group Packaging Systems (Guangzhou) Co., Ltd	Ningbo Xunxing Trade Co. Ltd
Pact Group Closure Systems (Guangzhou) Co., Ltd	Dongguan Top Rise Trading Co. Ltd	Changzhou Viscount Plastics Co Ltd*
Bangladesh		
TIC Trading (Bangladesh) Limited	TIC Manufacturing (Bangladesh) Limited	TIC Industries (Bangladesh) Pty Ltd.
India		
Pact Closure Systems (India) Private Limited	AMRS Business Services Private Limited	
Indonesia		
PT Plastop Asia Indonesia Inc	PT Plastop Indonesia Manufacturing Inc	
South Korea		
Pact Group Closure Systems Korea Ltd		
Nepal		
Pact Group Closure Systems Nepal Private Limited		
Philippines		
Plastop Asia, Inc.	Pact Packaging Philippines Inc.	Pact Closure Systems (Philippines) Inc.
Singapore		
Asia Peak Pte. Ltd.		
United States of America		
Pact Retail Accessories (USA) LLC	Pact Group (USA), Inc	Pascoe's Australia LLC*
United Kingdom		
Pact Retail Accessories (UK) Limited		

* Entities have been deregistered during the reporting period.

Pact's structure, operations and supply chain

Packaging

'Pact Packaging' is a market leader in rigid plastic packaging in Australia and New Zealand, with a growing platform in Asia. The division has regional scale with an extensive manufacturing footprint supported by innovation and a customer-centric structure.

Reuse

'Pact Reuse' encompasses retailer garment hangers, fresh produce crates, IBC's and steel drums through to the common household wheelie-bins.

The division is also a leading supplier of plastic materials handling products and custom moulded infrastructure products.

Recycling

'Pact Recycling' is a leading supplier of recycling and sustainability services in Australia and New Zealand.

Contract Manufacturing

'Pact Contract Manufacturing' is a leading supplier of services in Australia for the home, hygiene, personal care and health and wellness categories with manufacturing capability for liquid, powder, aerosol and nutraceutical products.

Pact's Supply Chain

Pact's supply chain primarily comprises the purchase of resin and colourants, packaging, chemicals and steel. It also includes the purchase of transport and logistics, labour hire, machinery and equipment, including maintenance and repair services, utilities and facilities related services such as cleaning, waste management and security, and professional services such as accounting, IT services and legal services.



PACT
PACKAGING

PACT
REUSE

PACT
RECYCLING

PACT
CONTRACT MANUFACTURING

Areas of risk

We have considered our supply chain and confirm that Pact's supply chain remains relatively streamlined. This is due to the nature of our business as a supplier of sustainable packaging solutions and reuse and recycling solutions, with resin being a key raw material input for Pact's packaging division.

Due to this streamlined structure, Pact has increased visibility over its direct supply chains, thus the risk of modern slavery in Pact's direct supply chain is considered low. Pact acknowledges that modern slavery risks are present in its extended supply chain (including the supply chain of its controlled entities). Upon conducting a review from a geographical and industrial perspective, Pact identified that the majority of its procurement does not occur in industries or countries that typically carry a high risk of modern slavery.

Pact is conscious of the modern slavery risk associated with sourcing individuals for temporary/casual labour. Although this only accounts for approximately 8% of Pact's expenditure with third parties. Pact aims to mitigate this risk in Australia

and New Zealand by concentrating at least 90% of its expenditure in these jurisdictions across three reputable casual labour providers with appropriate anti-slavery processes in place.

Pact engages with over 6000 suppliers. As demonstrated below, Pact sources almost 80% of its inputs from countries that carry a low risk of modern slavery according to the Global Slavery Index². Pact is committed to making a conscious effort to continue working with countries who place high value on ethical labour and human rights.

In all countries in which Pact operates, materials and labour hire are sourced locally wherever practicable. By sourcing from within the regions in which its businesses are operating, Pact has greater visibility over the organisational structure, processes and practices of its suppliers and is better placed to monitor their activities. This also ensures that Pact is well positioned to identify suppliers whose values and approach to modern slavery align with Pact's expectations.

Pact Source of Supply – Country	% of FY23 Spend	Risk Rating
Australia*	55%	Low
New Zealand*	11%	Low
China*	11%	High
Singapore*	8%	Moderate
Thailand***	3%	High
South Korea*	2%	Low
Italy	1%	Low
Philippines**	<1%	High
Germany	<1%	Low
United States Of America*	<1%	Low
United Arab Emirates	<1%	Low
Saudi Arabia	<1%	Low
India*	<1%	Moderate
Japan	<1%	Low
Hong Kong*	<1%	High
United Kingdom*	<1%	Low
Indonesia**	<1%	Moderate
Canada	<1%	Low
Netherlands	<1%	Low
Austria	<1%	Low
Nepal*	<1%	Moderate
Czech Republic	<1%	Low
Malaysia	<1%	Moderate
Taiwan	<1%	Low
Denmark	<1%	Low
Switzerland	<1%	Low
Belgium	<1%	Low
France	<1%	Low
Suriname	<1%	Low
Ireland	<1%	Low
Spain	<1%	Low
Vietnam	<1%	Moderate
Mexico	<1%	Low
Barbados	<1%	Low
Turkey	<1%	Moderate
Sri Lanka*	<1%	Low
Greece	<1%	Low
Bahrain	<1%	Low
Qatar	<1%	Low
Bangladesh	<1%	Moderate

² <https://www.globalslaveryindex.org/>, Walk Free Foundation

*Pact has operations in these countries

**Pact has operations in these countries both wholly owned and through joint ventures

***Pact has operations in these countries through joint ventures

Pact's actions

This section of the Statement explores the actions taken by Pact during the Reporting Period to assess and address the risks identified above.

Pact is a signatory to the United Nations Global Compact and upholds its 10 principles, including those in relation to human rights and labour. During the Reporting Period, Pact took a number of actions to improve its management of modern slavery risk.

Integrity and Ethical Sourcing Committee

During the previous reporting period, Pact established the Integrity and Ethical Sourcing Committee ('Committee'). The Committee continues to meet quarterly to:

- evaluate risks and make recommendations as to appropriate actions to be taken in the event that modern slavery risk is identified in Pact's business or supply chain;
- monitor current processes in place to identify new opportunities to improve Pact's approach to managing modern slavery risks across its operations;
- develop measures to assess and address modern slavery through due diligence and contractual obligations;
- develop appropriate training materials for Pact's employees and where appropriate, suppliers; and
- address other issues including anti-bribery and corruption risk, sanctions and ethical supply chain management.

The members of the Committee during this Reporting Period include:

- the Executive General Manager: Supply Chain;
- the Executive General Manager: Pact Packaging Australia & Asia;
- the Executive General Manager: Pact Retail Accessories;
- the Group Chief Financial Officer;
- the General Manager of Procurement;
- the General Manager of Assurance and Financial Control;
- the Group Manager Employee Relations; and
- the General Counsel and Company Secretary.

Pact's Modern Slavery Contact Officer also sits on the Integrity and Ethical Sourcing Committee.

Training

In the Reporting Period Pact conducted an internal awareness campaign in relation to modern slavery. The awareness campaign was promoted through an employee newsletter and intranet banner and required relevant employees to watch a training video which outlined key modern slavery concepts and the importance of Pact's Modern Slavery Policy. The training video will be rolled out to relevant new starters from FY24.

Due diligence

In the engagement of significant suppliers, Pact's process is to conduct tenders and requests for proposals which require participation in a due diligence process. The due diligence process varies by jurisdiction but generally includes completion of Pact's Modern Slavery Supplier Questionnaire, confirmation of compliance with our Supplier Code of Conduct, and provision of details in relation to all proposed subcontracting and outsourcing arrangements. Through the information provided, Pact is able to assess which suppliers align with our ethical values.

Pact's supplier management platform requires suppliers at the on-boarding stage to confirm their compliance with Pact's Modern Slavery Policy and complete Pact's Modern Slavery Supplier Questionnaire. During the Reporting Period, Pact has continued to expand the use of its supplier management platform across the organization. Pact has also explored alternative methods (including third party solutions) to enable it to better, and more comprehensively, assess supplier risk and identify high risk suppliers upfront, although Pact has not yet settled on a preferred method.

Any significant modern slavery risks identified through supplier due diligence processes or other channels are to be reported to the Committee.

Pact's procurement team has kept abreast of specific developments in relation to modern slavery risks relevant to Pact's largest and most strategically significant suppliers.

Policies

In this Reporting Period, Pact reviewed and updated its Modern Slavery Policy. Pact's updated Modern Slavery Policy (**Policy**) applies to all individuals who work for or on behalf of Pact, in any capacity, including employees, agency workers, contractors, consultants and any other third-party representative (**Pact Personnel**). The Policy has the purpose of educating all Pact Personnel about the Act, the risks of modern slavery and the responsibilities of Pact Personnel with respect to modern slavery. The Policy evidences Pact's commitment to acting ethically and our efforts to address, mitigate and prevent modern slavery in our operations, supply chain and business dealings.

The Policy is supported by Pact's broad range of policies that embed our commitment to reduce the risk of modern slavery in Pact's operations and supply chain. Pact's Anti-bribery & Corruption Policy, Code of Conduct, Modern Slavery Policy, Global Procurement Policy, Supplier Code of Conduct and Whistleblower Policy provide a framework for ensuring our workforce, operations and supply chain are managed in an ethical, socially responsible and compliant manner.

Supply chain management

Pact's standard agreements for the procurement of goods and services contain provisions including:

- a. requirements that Pact's suppliers act in an ethical and socially responsible manner;
- b. requirements that Pact's suppliers become signatories to and adhere to the principles of the United Nations Global Compact;
- c. requirements that Pact's suppliers comply with Pact's applicable policies and codes of conduct;
- d. warranties that Pact's suppliers will ensure that no forced labour, slavery, servitude or similar practices are in any way involved in the supply of goods or services to Pact;
- e. warranties that Pact's suppliers will maintain appropriate policies and procedures to ensure compliance with the modern slavery legislation;
- f. warranties that Pact's suppliers will supply all information and evidence reasonably requested by Pact to demonstrate compliance with the above;
- g. the right for Pact or an independent auditor appointed by Pact to audit the supplier to verify the supplier's compliance with its warranties;
- h. the right for Pact to terminate agreements with suppliers on the basis that the supplier has not complied with its obligations in relation to modern slavery;
- i. prohibitions on outsourcing without oversight as to the employment conditions of the contractor or subcontractor; and
- j. prohibitions on subcontracting the provision of goods or services without Pact's prior written consent.

Where contracts are entered into with significant suppliers that are not on Pact's standard terms, customised provisions addressing modern slavery risks are incorporated into the relevant contract.

Assessing effectiveness of Pact's actions

Currently, Pact assesses the effectiveness of its actions through various avenues:

1. Integrity and Ethical Sourcing Committee – the Committee is committed to reviewing, monitoring and improving our current actions taken to address and assess modern slavery.
2. Modern Slavery Supplier Questionnaire – we are improving our ability to measure the substance and extent of responses received to assess which suppliers are implementing modern slavery measures to mitigate risk (if any).
3. Supplier Management System – enables Pact to aggregate data and measure effectiveness of its actions (such as summarizing data on supplier risk levels and suppliers that have not agreed to comply with Pact's modern slavery requirements).

4. Training – modern slavery training, has resulted in a demonstrable increase in the level of awareness of relevant Pact employees regarding modern slavery risks and issues.

5. Procurement Team Feedback – we receive continuous feedback from our procurement team in relation to our training and onboarding processes in relation to our actions to cease any engagement with high-risk suppliers.

Ongoing risk assessment

In this Reporting Period, Pact continued to assess our suppliers' compliance with our modern slavery requirements. Pact continues to expand the scope and depth of its treatment towards any stakeholders carrying risk of modern slavery.

Consultation

This joint Statement has been prepared by Pact's management in consultation with senior leaders, staff, and directors from each reporting entity covered by this joint Statement. Pact also gained assistance from an external consultant and subject matter expert to ensure it is compliant with the requirements set out in the Act and the UK Modern Slavery Act 2015.

Pact's future focus

New Supplier On-Boarding Process

Pact will continue to refine its Supplier on-boarding process, including implementing a more stringent process with stricter modern slavery requirements for ongoing high value suppliers (compared with one-off and low value suppliers). Pact will also seek to commence roll-out of a supplier due diligence process to significant long-term suppliers who were on-boarded prior to implementation of Pact's supplier due diligence processes.

Further focus items of Pact during FY24 are:

1. **Further Training** – conducting refresher modern slavery training for relevant staff and roll out of modern slavery training in the induction pack for relevant new starters.
2. **Due Diligence** – continuing to explore third party solutions (including automation platforms) to enable Pact to more comprehensively assess supplier modern slavery risk to improve the robustness of our supply chain management.

Collaboration and engagement

This Statement is made on behalf of the reporting entities within the Pact Group including owned and controlled entities. This Statement was developed in consultation with the Integrity and Ethical Sourcing Committee and with input from a range of teams and functions.

This Statement has been reviewed, considered and approved by the Board of Pact Group Holdings Limited. It was approved by the Board on 19 December 2023.

Signed,



Sanjay Dayal

Managing Director and Group CEO
Pact Group Holdings Ltd

An aerial photograph of a coastline with a large teal circle overlay. The text "Leading the circular economy" is centered within the circle in white. The background shows a mix of dark blue water and lighter blue land areas.

Leading the circular economy

Our promise is to create a better
and more prosperous world all round.
That's our future Pact.

Let's lead the
way together.

www.pactgroup.com

