



Modern Slavery and Human Trafficking Statement for Financial Year Ending 31 December 2021

This Statement is given pursuant to the Modern Slavery Act 2018 (Cth) by Sealed Air Australia Holdings Pty Ltd (ACN 102 261 307) with its registered office at 1126 Sydney Road, Fawkner, Victoria.

1. Identify the reporting entity

Sealed Air Australia Holdings Pty Ltd (ACN 102 261 307) is an Australian company with the following controlled entities (together referred to below as “**Sealed Air Australia**”):

- (1) Sealed Air Holdings (New Zealand) Pty Ltd (ACN 602 021 036), which in turn controls the following entity:
 - a. Sealed Air (New Zealand) (11133), a New Zealand entity; and
- (2) Sealed Air Australia Pty Ltd (ACN 004 207 532), which in turn controls the following entities:
 - a. Sealed Air Pty Ltd (ACN 162 250 740); and
 - b. Entapack Pty Ltd (ACN 006 471 209).

Sealed Air Australia is 100% owned by the ultimate shareholder Sealed Air Corporation.

2. Describe the structure, operations and supply chains of the reporting entity

Sealed Air (NYSE: SEE) is in business to protect, to solve critical packaging challenges, and to make our world better than we find it. Our automated packaging solutions systems help promote a safer, more resilient and less wasteful global food supply chain, enable eCommerce, and protect goods transported worldwide. Our globally recognized brands include CRYOVAC® brand food packaging, SEALED AIR® brand protective packaging, AUTOBAG® brand automated systems, BUBBLE WRAP® brand packaging, and SEE™ Touchless Automation™ solutions.

We are leading the packaging industry creating a more environmentally, socially, and economically sustainable future and have pledged to design or advance 100% of our packaging materials to be recyclable or reusable by 2025, with a bolder goal to reach net-zero carbon emissions in our global operations by 2040. We are also committed to a diverse workforce and inclusive culture through our 2025 Diversity, Equity and Inclusion pledge. SEE generated \$5.5 billion in sales in 2021 and has approximately 16,500 employees who serve customers in 114 countries/territories. To learn more, visit sealedair.com.

Our supply chains include the sourcing of raw materials, packaging components, contract manufactured goods, equipment, and other direct materials, such as inks, films and paper principally related to the provision and manufacturing of goods. Our principal raw materials are polyolefin and other petrochemical-based resins, as well as chemicals such as caustic soda, solvents, waxes, phosphates, surfactants, chelates, paper and wood pulp products.

Sealed Air Australia’s supply chain consists of over 1600 suppliers, which include suppliers from New Zealand, Asia, North America, the Middle East and Europe/UK. For indirect purchases the main spend categories are freight, energy, real estate leases, insurances, Governmental bodies and MRO for operational sites. Direct purchases comprise of polymers used in production of finished goods, as well as various sub-categories of materials converted in our manufacturing process or used to package the finished goods. Examples of these materials are films, adhesives, inks, various paper products, tapes, starch, foils, cartons and pellets.

3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

Sealed Air Australia is continuing to use ethiXbase third party software as part of its risk assessment methodology to assess third party suppliers. We also perform vendor screening via a global ethics and compliance platform Navex which includes adverse media that has been published about the supplier related to modern slavery. Sealed Air Australia is also a member of Sedex, one of the world’s leading online platforms for companies to manage and improve working conditions in global supply chains.

Sealed Air Australia’s modern slavery risk assessment criteria of supplier responses include the following elements:

1. Nature of the supply relationship;
2. Respect of labour and human rights;
3. Social accountability; and
4. Business integrity (bribery, conflicts of interest, gifts and entertainment, codes of conduct, freedom of association, training and policies and procedures).

Each Sealed Air Australia supplier risk is/will be assessed based on their responses, geographical location and the type of industry. Suppliers were categorised as:

- Low Risk – Little or no risk of breaches of modern slavery legislation or the Sealed Air Australia Supplier Code of Conduct. No immediate action required.
- Medium Risk – Responses require further investigation and a potential SMETA audit.
- High Risk – Risk is deemed unacceptable, and the supplier should be suspended until investigations completed and results are considered satisfactory.

Following this assessment, areas of vulnerability in our operations were found to include outsourced services such as cleaning, security, transportation suppliers and materials sourced from Asia for protective equipment. We also acknowledge that we lack visibility in certain overseas markets, and this carries additional risks of modern slavery especially in secondary levels of our chain of suppliers and source materials used in our group’s goods and services.

4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

We have in place a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:



- *Global Anti-Slavery and Human Trafficking Policy.* This policy sets forth our stance on modern slavery and how employees can identify any instances of these practices and where they can report potential non-compliance.
- *Sealed Air global Code of Conduct.* This provides the foundational standards of conduct for all aspects of our business and is applicable to all our employees and operations globally. It includes provisions related to, among other things, ethical standards, compliance with laws, safe working conditions, and whistleblowing which encourages employees to raise concerns about issues they are observing or experiencing in the workplace or within our business functions without fear of reprisal. Our Code of Conduct applies to not only employees, but any entity that does business with or on Sealed Air's behalf.
- *Sealed Air Australia Supplier Code of Conduct.* This code explains our commitment to ethical workplace practices and sets forth the ethical and legal standards we expect suppliers will adhere to. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act in accordance with all laws and international and organizational standards governing slavery or forced labour (e.g. International Labour Organization). Additionally, supplier violations of this code may lead to the termination of the business relationship.

We are not aware of any modern slavery-related breaches of the above policy/codes during the reporting period.

Sealed Air Australia has so far requested about two thirds of its tier 1 suppliers with annual spend with Sealed Air Australia of USD100,000 or more to comply with the following requirements ("**Sealed Air Australia Modern Slavery Requirements**"):

- complete Sealed Air Australia's modern slavery risk questionnaire; and
- agree to Sealed Air's Global Anti-Slavery and Human Trafficking Policy, the Sealed Air Australia Supplier Code of Conduct and other Sealed Air Australia requirements to mitigate modern slavery risks in its (and the supplier's sub-contractor's) supply chain.

Of those vendors with annual spend of USD100,000 that have received our survey request, just under half have completed the survey to date. (We have also sent out numerous surveys to tier 1 suppliers with annual spend with Sealed Air Australia of less than USD100,000. About a third of all vendors that have received our survey request via ethiXbase have completed the survey to date.) In FY21, the results of our supplier risk assessments (and follow up queries with suppliers) were all "Low Risk". Given the outcomes of our risk assessment during the reporting period, no further investigations were required to address the risks of modern slavery in our operations and supply chain. We continue to follow up on and assess the questionnaire responses being received from our suppliers.

Our company has a robust global compliance training program in place comprised of mandatory training for employees related to code of conduct and ethical business practices using our E-Learning tool. Further, we have commenced rolling out training for relevant Sealed Air employees.

We have an Integrity Committee that communicates regularly with our global employees to provide guidance and updates on key related topics, serving to remind employees to uphold our Code of Conduct and making compliance and acting with integrity a priority.

5. Describe how the reporting entity assesses the effectiveness of these actions

Sealed Air Australia has put in place an assessment methodology and KPIs to measure the effectiveness of our actions to mitigate modern slavery risks. These include the following:

- track supplier compliance with the Sealed Air Australia Modern Slavery Requirements, assess supplier responses and, if appropriate, require the supplier to carry out a SMETA audit (or allow a Sealed Air Australia-conducted audit of the supplier); and
- review cases reported through reporting mechanisms.

We are reviewing our progress regularly in management review meetings.

6. Describe the process of consultation with any entities the reporting entity owns or controls

All the controlled entities are run under common management as Sealed Air Australia. We have included the suppliers of the controlled entities in our modern slavery risk mitigation strategy.

7. Provide any other relevant information.

Sealed Air Australia's Terms and Conditions of Purchase expressly oblige its suppliers to comply with all applicable laws including laws aimed at combatting modern slavery practices.

Sealed Air's ethics hotline (known as the Integrity Line) is operated by an independent, third-party reporting service. The Integrity Line is available anytime, via phone or web, for anyone (including non-employees) to seek guidance or report allegations of violations of our Code, our policies, or the law. For employees, the Integrity Line is designed to supplement existing reporting channels—not replace them. In addition, Sealed Air Australia has a Whistleblower Policy. This mechanism gives victims of modern slavery the ability to contact Sealed Air about any concerns.

We have improved our Sealed Air Australia new supplier onboarding process further by requiring new suppliers to comply with the Sealed Air Australia Modern Slavery Requirements to mitigate modern slavery risks. Further, our suppliers are required to acknowledge our Code of Conduct as they get onboarded onto our new purchase order management platform Coupa being rolled out in ANZ over the 2022 and 2023 calendar years.

We have information published on sealedair.com with respect to ethics & compliance, and code of conduct under the following links: <https://www.sealedair.com/company/ethics-compliance> <https://www.sealedair.com/company/code-of-conduct>

DocuSigned by:
This statement was approved by the Board of Sealed Air Australia (Holdings) Pty Ltd.

Brett Perrin
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Director

June 2022