

## UNRESTRICTED

# MODERN SLAVERY STATEMENT

prepared under the Modern Slavery Act 2018 (Cth)  
for the reporting period 1 January to 31 December 2020

## 1. REPORTING ENTITIES

This is a joint statement by the following Reporting Entities:

1. Syrinx Australia Pty Ltd ACN 130 046 267 of 19 Railway Terrace Nuriootpa SA 5355 (**Syrinx**)
2. CCL Secure (Holding) Pty Ltd ACN of 161 651 421 of 1-17 Potter Street, Craigieburn, VIC 3064, Australia
3. CCL Secure Pty Ltd ACN 072 353 452 of 1-17 Potter Street, Craigieburn, VIC 3064, Australia (**CCL Secure**)

The Reporting Entities each have a financial year of 1 January to 31 December.

## 2. LEGAL & ORGANISATIONAL STRUCTURE

The Reporting Entities are indirect, wholly owned subsidiaries of CCL Industries, Inc. All of the Australian subsidiaries of CCL Industries are owned, directly or indirectly, by Syrinx.

CCL Industries, Inc is a global specialty packaging pioneer, with headquarters in Toronto, Canada and Framingham, Massachusetts, USA and is listed on the Toronto Stock Exchange. CCL operates a number of business segments globally as follows:



CCL is a converter of pressure sensitive and specialty extruded film materials for a wide range of decorative, instructional, functional and security applications for government institutions and large global customers in the consumer packaging, healthcare and chemical, consumer electronic device and automotive markets.

In Australia, the CCL Segment is operated through the following entities:

- **CCL Label:** *CCL Label Australia Pty Ltd ACN 074 246 307 and CCL Label (Vic) Pty Ltd ACN 006 191 251*
- **CCL Secure:** *CCL Secure (Holding) Pty Ltd ACN 161 651 421*, a holding company which in turn owns *CCL Secure Pty Ltd ACN 072 353 452*. CCL Secure owns the issued capital in a Mexican subsidiary, but does not exercise management control over its manufacturing operations and supply chain.



Avery is a supplier of labels, specialty converted media and software solutions for short-run digital printing applications for businesses and consumers available alongside complementary products sold through distributors, mass market stores and e-commerce retailers.

In Australia, the Avery segment is conducted through the following entities:

- *Avery Australia Pty Ltd ACN 000 065 065*
- *Stuck on You Holdings Pty Ltd 163 866 902*, a holding company which in turn owns *Stuck on You Trading Pty Ltd ACN 163 867 141*

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Checkpoint is a developer of RF and RFID based technology systems for loss prevention and inventory management applications, including labeling and tagging solutions, for the retail and apparel industries worldwide.

In Australia, the Checkpoint segment is conducted through *Checkpoint Systems (Aust/NZ) Pty Ltd ACN 060 340 721*.



Innovia produces specialty, high performance, multi-layer, surface engineered films for label, packaging and security applications.

In Australia, the Innovia segment is conducted through *Innovia Films Holding Pty Ltd ACN 111 098 232, a holding company*, which in turn owns *Innovia Films Asia Pacific Pty Ltd ACN 007 415 714*.

Syrinx has no employees and is a passive holder of equity investments in Australian companies. Its sole suppliers are Australian accounting firms whose Australian-based staff provide financial audit and taxation services.

### 3. OPERATIONS & SUPPLY CHAINS

#### CCL LABEL

In Australia, CCL labels operate manufacturing facilities in South Australia (Barossa Valley), New South Wales (Griffith) and Victoria (Melbourne) and a Sales Office in New South Wales (Sydney) supporting customers in the Beverage and Healthcare sectors.

CCL employs some 150 staff under individual employment agreements in accordance with Australian Law or as part of a Fair Work Act approved Enterprise Agreement. Labour Hire resources are also used to supplement resources as required. Labour Hire resources are provided by licensed labour hire providers under the Labour Hire Licensing Act 2018 (LHL Act).

CCL Labels Australian operations sources most of its raw material (paper & resin, inks, die & packaging) through Australian-based distributors presenting global manufacturers based primarily in US & Europe. Indirect material is primarily sourced through the domestic market with some suppliers being Australian subsidiaries of offshore goods & service providers.

CCL Labels operates in accordance with the CCL Industries' Global Ethics Policy.

In order to reduce the risk of being inadvertently involved in sourcing product from non-reputable sources, CCL Labels Australia are in the process of developing a system to survey suppliers to ensure that where product is obtained from third parties, the products/supply chains are from ethical suppliers.

#### CCL SECURE

From a manufacturing facility in Victoria, CCL Secure Pty Ltd manufactures polymer banknote substrate for Central Banks around the world.

Our operations are supported by:

- **Raw materials** - those that are used in the process to manufacture Guardian™ substrate.
- **Packaging materials** - materials procured to securely deliver our product to our customers requirements.
- **Indirect materials** - which are all other materials, are necessary to the operations of our business, including logistics, technology, manufacturing equipment and consumables such as apparel and personal protective equipment.

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- **Skilled labour and Services** – CCL personnel are employed under individual employment agreements in accordance with Australian Law or as part of a Fair Work Act approved Enterprise Agreement. Labour Hire resources are also used to supplement resources as required. Labour Hire resources are provided by licensed labour hire providers under the Labour Hire Licensing Act 2018 (LHL Act).

### **Risk Management / Governance**

CCL Secure adopts the CCL Industries Global Business Ethics Guide and CCL Secure Global Business Ethics Supplement which requires CCL Secure representatives, amongst other obligations, to:

- Obey all laws and regulations applicable to their job and the countries in which we operate.
- Avoid both actual and perceived conflicts of interest.
- Not be involved in or ignore any form of bribery or corruption.
- Compete fairly and be careful about how they interact with competitors and suppliers.
- Protect CCL Secures confidential information.
- Speak up if they witness any unexpected or unethical behaviour.

CCL Secure is committed to ensuring we have an effective and robust approach to ethical leadership, governance and oversight with the following processes in place;

- The Company Values, Global Ethics Guide, Governance and Compliance framework are supported by the CCL Secure Governance Standard overseen by the CCL Secure Management Team
- Organisational structure includes Governance and Risk Committee Monitoring and an independent Risk function
- System of internal audit, controls, policy and procedures
- Extensive due diligence on suppliers
- CCL Secure is a member of the anti-bribery compliance organisation Trace International
- System of internal controls to ensure all transactions are with suppliers who have undertaken due diligence and are committed to appropriate business conduct
- Continued monitoring and oversight, including transactional audits
- Ethics training is provided

### **Workplace and Human Rights**

CCL Secure is committed to appropriate work place practices and implements procedures that recognise that everybody has the right to be treated with respect and dignity. CCL is committed to ensuring that its workplace is free from any form of inappropriate workplace behaviour, including unlawful discrimination, harassment (including sexual harassment), vilification, victimisation and bullying.

CCL Secures Human Rights Policy supports the principles of the United Nations Global Compact with respect to human rights, labour, the environment and anti-corruption.

We maintain and monitor our internal controls to ensure conformance with these policies.

### **Ethics Reporting / Whistleblower Hotline and Whistleblower Protections**

CCL Industries Ethics Hotline - Global Compliance is the third party operator of CCL's Ethics Hotline. Internal or external stakeholders can report all concerns and complaints free from any country 7 days a week, 24 hours a day via the telephone, mail or internet while protecting your anonymity.

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To meet the requirements of the Corporations Act 2001, CCL Secure has implemented a Supplemental Whistleblower Protection Policy, to ensure protected disclosures are handled in accordance with the law.

### International Standards and Certifications

CCL Secure maintains third-party certifications to the following standards and requires certification to these standards:

- ISO 9001 Certification for Quality Management Systems
- ISO 14001 Certification for Environmental Management Systems
- ISO 45001 Certification for Occupational Health & Safety
- ISO 27001 Certification for Information Security Management

In addition, CCL Secure holds a Banknote Ethics Initiative (BnEI) Level 1 Accreditation, which independently verifies our controls to ensure we are operating to the highest ethical standards in accordance with international standards.

## AVERY

Avery Australia undertakes the following operations; procurement of raw materials and third-party finished products, warehousing, manufacturing and distribution of products to Australia and New Zealand customers, both retail and commercial channels as well as production of products for online business and shipping custom-made products directly to consumers (D2C and WePrint). Avery Australia employs approximately XX employees across two sites in New South Wales and Victoria and all are required to follow the CCL Industries Global Business Ethics Guide.

All raw materials used in manufacturing plus all packaging and consumable items used by manufacturing and warehouse (e.g. packaging tapes, bubble wrap, plastic wrapping, inks etc) are procured both from overseas and local suppliers. Materials used for manufacturing labels are imported from Asia, USA and Europe but distributed by local agents. Purchased finished goods (PFG's) are sourced from 5 Chinese supplies, and from Avery USA, Avery Zweckform and Avery UK.

Labelstock materials used on General Purpose products and Laser Premium products can be interchangeable from 3 existing suppliers. Other labels materials can also be sourced from either of the 3 suppliers but may not be a direct equivalent. Suppliers of raw materials and third party finished goods are all in good financial standing and reliable.

## CHECKPOINT SYSTEMS

Checkpoint Systems Australia provides loss preventions solutions to Australian retailers. Checkpoint has offices in Australia and in 32 countries around the world, employing more than 4,500 people. Checkpoint respects and supports the protection of internationally recognised human rights to ensure that we are not complicit in any abuses of these basic rights. To fulfill this commitment, the Company is dedicated to maintaining fair, ethical, and sustainable business and sourcing practices. Checkpoint Australia sources most of its product from Checkpoint owned manufacturing plants in China, Japan, India, Bangladesh, Vietnam, Malaysia, Europe and North America. Checkpoint develops and designs its own products in accordance with the company's Global Ethics Policy and Checkpoint Australia sources products directly from these operations. In order to reduce the risk of being inadvertently involved in sourcing product from non-reputable sources, Checkpoint Australia are in the process of implementing a Modern Slavery Governance Program to ensure that where product is obtained from third parties, the products/supply chains are from ethical suppliers.

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### INNOVIA

#### Operations

Innovia Films is a major producer of highly differentiated specialty Biaxially Oriented Polypropylene (BOPP) films and supplies high performance films for applications such as security – banknotes, tobacco overwrap and food and beverage packaging.

Innovia Films employs >1,400 people worldwide and has production sites in **Australia, Belgium, Germany, Poland, Mexico** and the **United Kingdom**.

In Australia, Innovia Films has one manufacturing facility located in Melbourne, Victoria which currently employs 62 people.

#### Supply Chains

Innovia Films currently works with 20+ Tier 1 vendors who are headquartered in Australia, Europe, Middle East and Asia and provide a combination of goods and/or professional services.

#### Compliance

All employees have acknowledged that they will comply with the *CCL Industries Global Business Ethics* and employees are encouraged to report any ethical concerns via their Management Team or the CCL Ethics Hotline.

## 4. RISKS OF MODERN SLAVERY PRACTICES

### CCL LABEL

By both activity and expenditure, CCL Labels currently informally assesses its exposure to risk of Modern Slavery practices to be low. That said, in order to reduce the risk of being inadvertently involved in sourcing product from non-reputable sources, CCL Labels Australia are in the process of developing a system to survey suppliers to ensure that where product is obtained from third parties, the products/supply chains are from ethical suppliers.

### CCL SECURE

#### Risk of Modern Slavery in CCL Secure Operations

CCL Secure assesses the risk of Modern Slavery in our operations as Low.

Our workforce is employed under individual employment agreements; or collectively as part of a Fair Work Act approved Enterprise Agreement. Labour Hire resources are also used to supplement resources as required. Labour Hire resources are provided by licensed labour hire providers under the Labour Hire Licensing Act 2018 (LHL Act).

CCL Secure addresses human rights risks in our operations under our Global Business Ethics Guide and CCL Secure Global Business Ethics Supplement. These are further enabled by our Human Resource procedures concerning appropriate workplace behaviours such as discrimination, harassment, bullying and a comprehensive process for dealing with complaints regarding workplace behaviours in a fair, consistent and transparent manner.

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CCL Secure is committed to conducting our business in a safe manner and aims for continuous improvement and a workplace environment and culture that contributes to a healthy and safe workplace.

### Risk of Modern Slavery in the CCL Secure Supply Chain

CCL Secure assessed Modern Slavery risk based on:

(a) **Country Risk** - Country risk ratings provided by the Global Slavery Index (Estimated Prevalence) Transparency International, Trace International and our insurer.

During 2020, CCL Secures Direct supplier spend by country was as follows:

Country	% count	% spend	Vendor	% count	% spend
Australia	82.93%	94.19%	Thailand	0.49%	0.09%
United Kingdom	3.41%	2.20%	Spain	0.24%	0.08%
USA	3.41%	0.84%	Italy	0.49%	0.05%
Canada	0.98%	0.68%	Austria	0.24%	0.04%
Switzerland	1.95%	0.52%	Singapore	0.49%	0.03%
Vietnam	0.73%	0.39%	Japan	0.24%	0.03%
Germany	1.22%	0.31%	Belgium	0.24%	0.02%
New Zealand	0.73%	0.15%	Netherlands	0.49%	0.01%
France	0.49%	0.13%	Ireland	0.49%	0.01%
Czech	0.24%	0.13%	South Africa	0.24%	0.01%
Luxemburg	0.24%	0.09%			

Of the above countries listed, five countries were flagged as a country risk in accordance with our methodology. All of the vendors within these countries provided professional and / or consulting services to CCL Secure and we are satisfied there is no residual risk of slavery, based on geographic factors from our direct, Tier 1 suppliers.

(b) **Product Risk** - By the List of Products at risk of modern slavery as provided by the Global Slavery Index. CCL Secure have identified risks in certain countries as follows:

- China: Apparel - Uniforms and PPE
- China: Electronics - Laptops, computers, mobile phones

These products are sourced from Tier 1 suppliers in Australia.

(c) **Other Supply Chain risks** – CCL Secure acknowledges that risks may be present deep in our supply chains in industries not listed by the Global Slavery Index:, as referenced in (b) above:

- Raw Materials – Pigments are sourced by Tier 1 suppliers in Australia. The Tier 2 suppliers are all significant global market participants with published corporate social responsibility reports or equivalent.
- Ocean freight suppliers – There is a risk of the use of low cost labour at shipping ports and on board cargo ships. These services are placed on our behalf by an Australian owned freight forwarding company.

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### EVERY

Avery Products is a member of SEDEX (Supplier Ethical Data Exchange). The company was audited by a third party SEDEX auditor as part of this.

Employees are required to complete the online ETI (Ethical Trading Initiative) that covers all knowledge protecting works against modern slavery practices.

All Chinese suppliers are required to be a member of SEDEX, must be audited by a 3rd-party SEDEX auditor every two years and must be compliant with all applicable international and local laws protecting all workers.

### CHECKPOINT SYSTEMS

Checkpoint are implementing a Modern Slavery Governance Program that will be managed by a cross-functional team (MSA Team) within the Company comprised of managers and subject matter experts from the following departments: Corporate Compliance, Legal, Human Resources, Risk Management, and Procurement.

The company also has a number of its existing programs and practices to ensure that it can minimise modern slavery risks in its own operations. Some examples of these leveraged programs and practices are highlighted below:

**WHISTLEBLOWER HOTLINE:** The Company has a confidential whistleblower hotline in place that allows all workers to anonymously report any workplace issues. Workers are able to report any suspicions or concerns of modern slavery practices, whether in their own workplace or in the workplaces of any of our suppliers.

**WORKPLACE PRACTICES:** The Company has policies and practices in place that provide employees, at any of its operations with the following protections:

- Provided with a written document in a language they understand that clearly describes the terms of employment, including wage rates and working hours;
- Free to lawfully resign their employment without restriction or penalty, except for customary and reasonable notice;
- Paid on a regular recurring basis at least once per month and on time and provided with pay slips that clearly outline how their wages have been calculated and itemise any deductions; and
- Paid at least the minimum wage per hour or other increment of time as prescribed by law, regulation, or other requirements in the applicable jurisdiction(s).

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### INNOVIA

Innovia Films have assessed its risks of modern slavery practices taking into consideration the potential Innovia Films may have caused, contributed to or could be directly linked to modern slavery.

The outcome of this assessment was the identification of two key risk areas: employees and vendors – suppliers supplying goods and contractors providing a professional service.

**Employees:** it was established that key risk areas for employees were in remuneration and employment practices.

**Vendors:** identified that suppliers supplying goods could be at risk of modern slavery depending on the type of goods and how and where it is produced.

## 5. ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS and ASSESSMENT OF EFFECTIVENESS OF THE ACTIONS

### CCL LABEL

CCL Labels in Australia, are in the process of developing a system to survey/evaluate suppliers to ensure that any risks are minimised.

### CCL SECURE

#### Review of Vendor Database

CCL Secure undertook a modern slavery risk assessment. The process reviewed the vendor database to identify parts of our operations and supply chain that carry a higher level of modern slavery risks and confirmed.

- Suppliers have undergone due diligence and signed up to the CCL Secure Code of Conduct and Ethics for Suppliers
- Key raw materials suppliers have been reviewed and we confirm they have documented commitment to corporate social responsibility and responsible sourcing. This is conveyed via published sustainability or corporate social responsibility reports.

#### Supplier Due Diligence Processes

All vendors must undergo due diligence checks prior to being established as a vendor. Supplier due diligence procedures are based on risk factors including country risk factors, including slavery, corruption and sanction. The due diligence requires suppliers to complete questionnaires that explore the businesses ownership, compliance information, financial history and business references.

Based on risk factors, further reputational screening is conducted using Dow Jones / Factiva tools. This Screening process is conducted to identify red flags or potential risks in any adverse media, sanctions and legal enforcement information.



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### **Supplier Code of Conduct**

To be set up as a supplier to CCL Secure, we require the supplier to confirm they have read, understood and agree to sign up to our code of conduct and ethics for suppliers. Only when these items have been completed will a vendor be approved for use.

### **Grievance Reporting / Whistleblower**

CCL's Ethics Hotline details are provided to our suppliers. Internal or external stakeholders can report all concerns and complaints free from any country 7 days a week, 24 hours a day via the telephone, mail or internet while protecting your anonymity. To meet the requirements of the Corporations Act 2001, CCL Secure has implemented a Supplemental Whistleblower Protection Policy, to ensure protected disclosures are handled in accordance with the law.

### **Workforce training and Procedures**

Our employees are trained as part of induction and then on a recurrent basis. Training explains our key obligations under our Code of Conduct, Human Resources Policies, and on safe work procedures.

Purchasing policies and supplier set procedures are documented and relevant team members trained.

### **Assessment of Effectiveness of our Actions**

During 2020 CCL Secure completed a baseline assessment of our internal control framework to minimise the risk that modern slavery poses to our business, which noted our longstanding process of supplier due diligence and confirming our suppliers commitment to our Code of Conduct and Ethics for suppliers.

This assessment identified areas of improvement we will implement in 2021 and beyond as follows:

- Continued and renewed risk based vendor due diligence reviews of our suppliers that procure goods or provide services from offshore locations
- Continued verification of the full supply chain for the suppliers with inherent modern slavery risk factors identified above
- Conduct Modern Slavery training for Supply Chain team members, our most active purchasing department

In 2021, the above actions and an overall assessment of the effectiveness of our internal controls will be monitored at the CCL Secure Governance and Risk Meeting, attended by Regional Management Team members.

## AVERY

All employees are trained on CCL Code of Conduct Values and Ethics which is very similar to ETI Base Code. This is in the form of online ETI Base Code training for employees with access to email and 'classroom-style' training to employees who doesn't have access to work email.

Employment Agencies are also required to provide training to all their workers before they can send anyone to work at Avery on casual basis. There's a written agreement between Avery and employment agencies to comply with ETI Code and SEDEX requirements and Avery products can do an audit at the Employment Agency's place that may require the agency to present proof of ETI Base Code training and proof of training carried out.

As for third-party suppliers, all suppliers are included on Avery's SEDEX network and are required to provide a copy of audit results.

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The effectiveness of the process and management actions and initiatives to protect all employees is evident on retaining employees and no known formal complaints.

### CHECKPOINT SYSTEMS

Checkpoint is committed to implementing a Modern Slavery Governance Program and monitoring the effectiveness of its ongoing actions to assess and address modern slavery risks, including tracking a range of qualitative and quantitative indicators of these risks. Checkpoint will establish key performance indicators and implement regular review processes, as well as ongoing monitoring and data collection activities, to ensure the Company can proactively respond to modern slavery risks in its business operations and supply chains. The Company recognises the importance of a continuous improvement approach to combating modern slavery risks in its operations and supply chains.

### INNOVIA

The following actions were undertaken by Innovia Films during the reporting period:

- established a working group responsible for managing Modern Slavery compliance obligations.
- developed a Modern Slavery Policy outlining Innovia Films' commitment.
- People: commenced a review of remuneration practices including payroll and Industrial Relations instruments.
- Vendors: identified, assessed and classified vendors taking into consideration revenue, goods and services provided and country of origin to establish Tier one vendors.

#### Assessment of Effectiveness

- no major non-conformances were detected in the remuneration practices review.
- >75% of Tier 1 suppliers were classified as a low risk

## 6. IMPACT OF COVID

During 2020, the Syrinx subsidiaries took many actions to minimise the risk of transmission of COVID-19 in the workplace. The entities also took steps to minimise supply chain risks to continue our operations and deliver to our customers.

In terms of our supply chain:

- To maintain a safe workplace, COVID-19 necessitated the purchasing of Personal Protective Equipment (PPE) to protect our employees and contractors. This PPE was procured from an Australian supplier but was predominately manufactured by a supplier in China. The apparel industry in China is included within the Global Slavery Listing of products at risk of forced labour.
- We were unable to visit any offshore supplier and relied upon desktop verifications and risk assessment mechanisms.

We will continue to implement COVID Safe work practices in 2021.

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## CONSULTATION & APPROVAL OF THIS MODERN SLAVERY STATEMENT

The Australian management team of each business segment has contributed to the preparation of this statement.

The governing body of each Reporting Entity has approved this statement.

A handwritten signature in black ink, appearing to read 'Neil Sanders', with a long horizontal flourish extending to the right.

Neil Sanders

Director, Syrinx Australia Pty Ltd, CCL Secure (Holding) Pty Ltd and CCL Secure Pty Ltd