

Labour and Human Rights Policy

As part of our Pregis Purpose, i.e. to Protect, to Preserve and to Inspire, Pregis respects and supports internationally proclaimed human rights. We work to guard against complicity in human rights abuses and comply with all applicable labour and employment laws. We comply with all applicable laws and are guided by relevant internationally recognised principles.

Where local legislation conflicts with this Policy, we will uphold our commitment to human rights without compromising our respect for the law and provide examples of good practice through our own business conduct.

To meet our objectives, we will:

- Meet the relevant local, national and regional laws and all relevant international treaties and agreements;
- Act in accordance with internationally declared human rights and standards;
- Undertake human rights assessments, drawing on existing best guidance, to identify those areas of our business where there may be higher risk of human rights abuse, including modern slavery, forced labour and human trafficking;
- Avoid causing or contributing to modern slavery and other adverse human rights impacts through our own activities, and address such impacts - if they do occur - in a timely and appropriate manner;
- Seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products or through our business relationships;
- If we identify that we have caused or contributed to adverse human rights impacts, provide for or cooperate in their remediation through legitimate processes;

With regard to our employees, we will:

- Ensure that all work is voluntary, and that employees are free to leave work or terminate their employment upon notice, in line with mandatory and contractual regulations, and that all employees have employment contracts or terms and conditions outlining their rights and obligations if required by law;
- Promote equality of opportunity in the workplace and value diversity in our employees and seek to eliminate all forms of discrimination and harassment, including those on the grounds of gender, marital or parental status, ethnic or national origin, social background, sexual orientation, religious belief, political opinion, age, disability, or union membership;
- Not tolerate any instances of child labour. We do not employ persons below the age of 15 or the local minimum employment or mandatory schooling age, whichever is higher;
- Ensure that special protections are in place for young workers (those below the age of 18 and above legal minimum working age);
- Not tolerate any inhumane treatment of employees, any form of forced labour, modern slavery, human trafficking, physical punishment or other abuse;
- Consider vulnerable groups in our workforce, including migrant and temporary workers;
- Protect the health and safety of our employees, and promote their wellbeing;
- Provide a secure working environment;
- Provide fair wages, working hours and benefits that at least meet legal or industry minimum standards;
- Respect the right of all employees to form and join trade unions of their choice and to bargain collectively without fear of retaliation or discrimination. Those situations in which the right of freedom of association and collective bargaining are restricted under law, we will facilitate and not hinder parallel means of independent and free association and bargaining. We will ensure that

such employee representatives are not the subject of discrimination and that representatives have access to their members in the workplace;

- Comply with all applicable national laws and industry standards on working hours and promote a culture that fosters workplace flexibility and work/life balance;
- Invest in Pregis employees by providing development opportunities and encouraging continuous learning;
- Encourage employees to take personal responsibility for ensuring that our conduct complies with our principles and Policies;

With regard to our suppliers, we will:

- Seek to establish commercial relationships with suppliers that share and adhere to our commitments on human rights.

With regard to our communities, we will:

- Seek to understand and appropriately manage any human rights impacts that we may have on the local communities in which we operate.

We will maintain readily accessible grievance mechanisms in each country in which we operate to allow internal and external stakeholders to raise any grievances or concerns. All grievances and concerns raised will be recorded and actively investigated to facilitate a satisfactory resolution. We will ensure that no one will suffer for raising with management any violations of our Policies, or any legal or ethical concerns.

We will provide the appropriate resources and training to all our operations to understand and implement this policy and monitor, report on and audit our performance. We will review our management systems, including this policy, on a regular basis to ensure they remain current and appropriate to the nature and scale of our operations.

Conré Oostrom, President Pregis Europe, April 2020