



2024 Forced and Child Labour Report

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This Report is published pursuant to the Canadian “Fighting Against Forced Labour and Child Labour in Supply Chains Act” (the “Act”) and sets out the steps that Winpak Ltd. (the “Company” or “Winpak”) has taken and is continuing to take to combat forced and child labour in our business and supply chains. The Report covers activities for the financial year ended December 29, 2024. As a federally incorporated business, we are required to include our statement with our financial statements on February 27, 2025.

INTRODUCTION

We acknowledge our responsibility to combat forced and child labour and are committed to acting ethically and with integrity and transparency. We are working to put systems and controls in place to safeguard against any form of forced or child labour taking place within the business or our supply chain.

OUR BUSINESS

Winpak is controlled by Wihuri International Oy, a Finnish corporation. Winpak is closely aligned with Wipak, which is one of Europe’s leading manufacturers of packaging materials and is also controlled by Wihuri International Oy.

Winpak is committed to the manufacture and sale of high-quality packaging materials and the production of related innovative packaging machines. The Company’s business encompasses three operating segments: a) flexible packaging, b) rigid packaging and flexible lidding and c) packaging machinery and is produced within twelve manufacturing facilities located in North America. Winpak distributes products to customers primarily in North America for the protection of perishable foods, beverages and in healthcare applications. In 2024, our revenue was \$1.13 billion US and as of December 29, 2024, we employed 2,900 people. Additional information, including the 2024 Annual Report, is available on the Company’s website at www.winpak.com or on SEDAR at www.sedar.com.

OUR SUPPLY CHAINS

We procure a significant proportion of goods and services from a small number of suppliers and choose to establish strategic, long-term, and transparent relationships and to engage with all suppliers in an ethical and socially responsible way. Our supply chains include the sourcing of raw materials, packaging supplies, machinery, maintenance components, and other direct materials such as inks, films, adhesives, solvents and paper. The key raw materials are polyethylene, polypropylene and nylon resins, as well as aluminum foil.

POLICIES AND DUE DILIGENCE PROCESSES

We have a goal to take an active role in ensuring that our suppliers respect human rights and prevent violations and take efforts to combat forced and child labour. Our Vice President of Supply Chain and Procurement is responsible for ensuring that our suppliers meet our expectations on all issues surrounding forced labour and child labour as outlined in our Supplier Code of Conduct, which all suppliers are required to adhere to. The Supplier Code of Conduct was amended during 2024 to align more closely with the obligations under the Act and the language used therein.

We are committed to working with current and prospective suppliers to ensure a clear understanding and appreciation of the values and provisions of the Supplier Code of Conduct and ethical business practices. Prior to qualifying any new suppliers, a Supplier Qualification Questionnaire must be completed and returned in conjunction with a signed copy of the Supplier Code of Conduct. We have a pre-employment background check, including age verification, for candidates before hiring to prevent child labour in our own operations.

We conduct supplier assessments and audits to ensure compliance with the Supplier Code of Conduct. We will support our suppliers’ efforts to meet the standards through dialogue and cooperation. Suppliers who do not meet the requirements in the Supplier Code of Conduct need to take the necessary corrective actions and show progress. If suppliers are unwilling or unable to carry out corrective actions, we reserve the right to terminate the business relationship and any agreements with

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suppliers immediately. In addition, we leverage the EcoVadis platform to assess our suppliers' sustainability performance, especially as it pertains to human rights.

To formalize the commitments described above we have developed policies with subject matter experts and signed by group functional heads and approved at the director level. These policies include:

1. Supplier Code of Conduct

Our Supplier Code of Conduct helps ensure that all business partners, suppliers, and manufacturers meet our basic expectations of conducting business, including in relation to forced and child labour. We expect all suppliers to comply with the Code that forms part of all agreements between Winpak and suppliers. Suppliers must comply with all laws and regulations applicable to their own operations. Any unlawful or prohibited conduct, inclusive of forced labour or child labour, will not be condoned.

The Supplier Code of Conduct addresses issues of forced labour and child labour, setting forth the following requirements:

- Not to accept, use, or benefit from modern slavery of any kind, including forced labour and child labour;
- Not to employ individuals under the age of 18; and
- Respect human rights as defined in the Universal Declaration of Human Rights and International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at work.

2. Business Code of Conduct

Our Business Code of Conduct is intended to establish value-based guidelines for how we interact with stakeholders, internal and external to our operations. This policy includes guidelines on topics such as business ethics as well as considerations on Environmental, Health, and Safety (EHS).

3. Whistle Blower Policy

We have established a whistleblowing process, reporting the various forms of misconduct, including concerns related to workplace harassment, safety and violations of human rights. This reporting mechanism is accessible to all Winpak employees, customers, suppliers and other stakeholders, which allows for anonymous submissions and treatment of complaints.

We focus on forming and maintaining transparent and collaborative relationships with suppliers. We have established an internal audit program to assess health, safety, and environmental progress for our operations. Our internal quality team conducts onsite audits to ensure that the facilities are up to standard from a safety perspective and that the relevant ISO certificates are in place.

FORCED LABOUR AND CHILD LABOUR RISKS

At least annually, we perform an independent assessment of the risk of forced and child labour in our supply chains and to better understand the risks associated with the country of origin and industry of our procured products and the risk profile in terms of forced and child labour for supply chains. The regions where Winpak operates are generally not associated with high incidences of forced labour and child labour. Less than 5 percent of our goods are imported from tier 1 suppliers outside of North America.

REMEDIATION MEASURES

We have established a whistleblowing process that encompasses the reporting of various forms of misconduct, including concerns related to workplace harassment, safety and violations of human rights. This reporting mechanism is accessible to all Winpak employees, customers, suppliers and other stakeholders and allows for anonymous submissions. Reports that are submitted through the ConfidenceLine, a telephone reporting line and interactive website run by an independent service provider, will be forwarded anonymously to designated independent individuals for investigation. As per the Whistleblower Policy, all Winpak employees have the responsibility of ensuring their own behavior is appropriate and reporting any incidents they become aware of.

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For any grievance raised, the Chief Human Resources Officer and the Chair of the Audit Committee will get a copy of the transcript from the independent service provider. The Manager, Internal Audit manages the oversight of any complaints. There is also an internal benchmark for the number of business days to provide a response to the filer of the complaint. In 2024, no complaints were received in relation to forced labour or child labour.

We recognize the potential impact, including financial, of our actions we would take should we elect to take any measures to eliminate the use of forced labour or child labour, including ceasing to do business with problematic suppliers due to their practices in relation to forced labour and child labour. When these situations arise in the future, we would favor complying with our commitment to fight force labour and child labour while trying to mitigate any adverse impact arising therefrom.

REMEDIATION OF LOSS OF INCOME

To our knowledge, there were no incidents of non-compliance in our operations or supply chains. Therefore, no remediation measures were necessary in 2024.

TRAINING

We provide ongoing mandatory training to all procurement personnel to ensure a deep understanding of the Supplier Code of Conduct, our principles, and values. The training materials are a combination of internally developed and external platforms, including EcoVadis. Labour rights and forced and child labour are topics within the training. Over the past two years, approximately 40 employees were trained.

Every new staff member on the supply chain team must complete training on our values and Code of Conduct, as well as on how to report issues of concern using the whistleblowing reporting tool. There is an ongoing communications campaign to encourage a 'speak-up' culture around labour rights and ethics.

ASSESSING EFFECTIVENESS

We are committed to corporate transparency and responsible supply chains. In 2020, we set a goal to achieve 100 percent responsible supply chains by 2025 and in 2024 we had attained 79 percent compliance.

Winpak has sites undergoing Sedex Members Ethical Trade Audits (SMETA) that cover a variety of topics, such as labour, health and safety, environment and business ethics. These audits are designed to help protect workers from unsafe conditions, overwork, discrimination, low pay, and forced labour. We also use the EcoVadis platform to evaluate our sustainability performance across multiple Environmental Social Governance (ESG) criteria and have encouraged our suppliers to submit the EcoVadis questionnaire to help us understand their strengths and areas of improvement.

We recognize the importance of maintaining constant vigilance to identify and address any instances of forced and child labour throughout our business and supply chains. We will be reviewing the progress and effectiveness of our programs in combating forced and child labour on an annual basis.

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In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Antti I. Aarnio-Wihuri
Chairman
February 27, 2025

I have the authority to bind Winpak Ltd.