



## **Bericap Inc.**

### **Canadian Modern Slavery Act Report**

#### **Introduction**

This Report for the financial year ended 30 June 2023 is made in accordance with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act effective as of January 1, 2024 (“**Act**”). This is a statement for Bericap Inc. (referred to as the “**Reporting Entity**”). The Reporting Entity is a company incorporated in Canada.

#### **Bericap’s Structure, Operations and Supply Chains**

##### ***Structure***

Bericap Inc., is located at 835 Syscon Court, Burlington, ON Canada L7L 6C5 and is registered under the Business Corporations Act. Bericap is a privately held company globally. In Canada, Bericap is jointly owned by Bericap Capital GmbH & Co. KG and Amcor Packaging Canada, Inc.

##### ***Operations***

Bericap is a privately held, family-owned company founded in 1926 in Germany and is one of the leading manufacturers of plastic closures for food, beverage and industrial markets. Bericap’s plastic closures incorporate tamper evidency, sealing features, pouring features and more, all of which are backed by our Research and Development centers in Europe and the U.S. In North America, Bericap is jointly owned by the Bericap Group and the Amcor Group.

Bericap produces more than 94 billion closures annually with 29 plants operating in 22 countries. This global presence is furthermore strengthened through sales offices, distribution centers and trade representatives, extending our footprint to over 100 countries.

Bericap Inc. employs approximately 145 staff in Canada. Bericap Inc. is focused on the manufacture and sale of injection molded plastic closures for food, beverage and industrial applications.

The Amcor Group is a global leader in developing and producing responsible packaging solutions across a variety of materials for food, beverage, pharmaceutical, medical, home and personal-care, and other products.



Amcor works with leading companies around the world to protect their products and the people who rely on them, to differentiate brands and improve supply chains through a range of flexible and rigid packaging, specialty cartons, closures and services.

Amcor Group's history dates back more than 150 years, with origins in both Australia and the United States of America. Amcor Group's business activities are organized around two reportable segments, Flexibles and Rigid Packaging with a globally diverse operating footprint, selling to customers in North America, Latin America, Europe and the Asia Pacific regions.

### ***Supply Chain***

The Reporting entity's purchasing organization is comprised of the business group Supply Chain team and local Materials team. The business group Supply Chain team is responsible for supplier selection and contract negotiations in accordance with Bericap's procurement guidelines. Members of this team have North American responsibilities and oversight. The Materials team manages the local procurement of goods and services directly in accordance with Supply Chain approved suppliers, material requirements and other relevant guidelines. Goods and services of low value may be purchased locally without involvement of the Supply Chain team, provided relevant guidelines are followed. The local Materials team reports to the facility General Manager.

### **Forced Labour and Child Labour Risks in Bericap's Operations and Supply Chains**

We strongly value our suppliers as key partners in ensuring the quality of our products and the smooth functioning of our operations. But we also recognize the supply chain is a potential source of environmental, labour and human rights risk and we have adopted the processes and procedures described below to identify and mitigate those potential risks.

We have considered the extent to which we may contribute to, cause or be linked to forced labour and child labour risks in our operations and supply chain. Though the packaging industry's supply chain is less susceptible to social issues such as child labor and forced or compulsory labor than many other industries, we nevertheless recognize that forced labour and child labour has the potential to exist within our operations and complex supply chain and we continue to remain proactive in protecting ourselves, our customers, and our communities.

Our human resources processes and policies are designed to ensure our team members are paid fairly, in compliance with applicable labour laws and treated fairly with dignity and respect. We put people at the center of everything we do and recognize that they are the driving force behind our more sustainable innovations.

Health and safety is a core value of the Bericap Group. We champion a safe work environment and safe and responsible behaviours among all employees. That all manufacturing, warehouse, and office sites are subject to global standards for safety and environmental management. The Bericap Group and the Amcor Group establishes expectations for managing environment, health and safety (EHS) risks in the workplace



through a global management system comprised of EHS Standards, employee training and development, audits and self-assessments, and core management principles. These program elements are integrated and upheld through management commitment and employee engagement globally.

Recognizing the level of control we exercise over our operations, including our risk management and compliance systems, we consider that relevant risk exposures reside principally in our supply chain, rather than in our operations. We view potential areas of risk in the supply chain as follows:

- *Facilities management suppliers*: use of child labour and/or illegal migrant workers to potentially manage costs as well as business demand variation.
- *Personal protective equipment and uniform suppliers*: use of child labour, servitude and/or forced labour in the textile industry that produces both upstream material as well as finished goods. Such items include uniforms, gloves, protective glasses, protective hats, protective footwear and ear plugs.
- *Ocean freight suppliers*: use of low-cost country labour at shipping ports of despatch, as well as labour onboard cargo ships, may present a risk of forced labour and debt bondage, where the economic circumstances and unskilled labour from low-cost countries may be exploited. Appointed shippers can also reassign cargo to other freighters to assist in efficient container routing and this results in loss of direct control of practices, potentially adding to this risk.
- *Local transportation suppliers*: use by transport and/or warehouse operators of child labour and/or illegal migrant workers to reduce costs and in response to variations in business demand.
- *Waste management/processing*: use of child labour and/or forced labour particularly as it pertains to mechanically and/or chemically recycled post-consumer and post-industrial waste for the production of recycled materials.

### **Actions Taken to Assess and Address Forced Labour and Child Labour Risks**

The Bericap Group has a framework in place to assess and address forced labour and child labour risks in its operations and supply chains (and which applies in respect of the Reporting Entity). Forming part of that framework are our due diligence and remediation processes and policies that underpin those processes.

### ***Policies and Due Diligence Processes***

The following are key elements in our effort to prevent forced labour and child labour in our operations and supply chains. These processes help keep us informed about developing trends, tools and requirements for forced labour and child labour risk management, which we consider when evolving our practices and processes on identifying, assessing and managing forced labour and child labour risks in our supply chain. Bericap Inc. is subject to both Bericap Group and Amcor Group global policies and procedures.

- Bericap Code of Conduct and Amcor Code of Business Conduct and Ethics: Both the Bericap Code of Conduct and The Amcor Code of Business Conduct and Ethics provide a framework for making ethical business decisions, with regard to the Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises. It



establishes the importance of exercising sound, ethical judgment and to recognize the shared values we have with our customers, shareholders, employees, suppliers and other third parties with whom we do business.

Both Codes are applicable to all directors, officers, employees, agents, contractors and secondees of the Bericap Group and Amcor Group and includes a set of detailed standards and guidance related to areas such as business integrity, conflicts of interest, labour practices, health and safety, legal compliance, risk management, and escalation of issues. Topics covered include non-discrimination, freedom from harassment, prohibition of child labour and freedom of association.

The Codes are communicated to all employees in their local language and are available locally through the online HRIS system.

- **Supplier questionnaire:** As part of the supplier onboarding process, all new suppliers, managed centrally through both Bericap North America's Supply Chain and Quality and Compliance teams, are required to complete a self-assessment questionnaire. This questionnaire contains a set of sustainability-related questions which helps our Supply Chain and Quality and Compliance teams assess and address potential environmental and social risks before we initiate a relationship with the supplier. Covered topics include environmental incidents, labor or health and safety violations, environmental certifications, business ethics and environmental management policies, and coverage of environmental, health, safety, human rights, and social requirements in the supplier's code of conduct.
- **EcoVadis:** EcoVadis is a platform for corporate social responsibility (CSR) assessment, monitoring, and performance improvement. Bericap Inc. completes regular EcoVadis assessments of its operations at a global level with local business units reporting.

**Sedex:** Bericap is also a member of Sedex, the Supplier Ethical Data Exchange, a not-for-profit organization dedicated to driving improvements in ethical and responsible business practices in global supply chains. Bericap participates in Sedex in two key ways. Our manufacturing site completes regular self-assessment questionnaires focused on topics like company policies, safety standards, working conditions and environmental impact. We also complete Sedex Members Ethical Trade Audits (SMETA) upon customer request.

- **Customer Social Compliance Audit:** Bericap Inc. is required to complete a customer Social Compliance audit, performed by external auditors, every three years. These audits ensure that Bericap complies with customer Supplier Guiding Principles, including laws and regulations, child labour, forced labour, abuse of labour, freedom of association and collective bargaining, discrimination, wages and benefits, work hours and overtime, health and safety, environment, land rights, business integrity and demonstration of compliance.



## **Remediation Processes**

Bericap Inc. has a process in place, through the Amcor Group, which allow employees and third parties to report concerns about suspected or actual improper conduct, including in relation to forced labour and child labour.

- **Whistleblower Service:** The Amcor Group has a Whistleblower Policy and an independent, third-party Whistleblower Service which enables employees and external stakeholders (including suppliers, customers and contractors) to report suspected wrongdoing online or through a dedicated, multilingual hotline that operates 24 hours a day via an independent third-party service provider. A report may be submitted anonymously where permitted by law. Wrongdoing can include but is not limited to potential forced labour and child labour related concerns, and other breaches of our Codes of Conduct and other policies. The Whistleblower Service and all supporting information is available in all the local languages where the Bericap Group in North America and the Amcor Group operates.

All complaints received are referred to Amcor's Whistleblower Committee for investigation in collaboration with the relevant business group or internal audit function. Outcomes from each investigation are reported to the Board of Directors of Bericap in North America. No forced labour or child labour related concerns have been raised through the Service in the financial year ending 30 June 2023.

## **Income Support for Vulnerable Families Affected by Ending Forced or Child Labour**

We have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

## **Assessing the Effectiveness of Bericap's Actions**

Bericap Group has put in place key performance indicators to monitor the effectiveness of the actions that it has (and the Reporting Entity has) taken to mitigate forced labour and child labour risks in its operations and supply chains.

- **EcoVadis:** The Bericap Group completes a regular EcoVadis assessment of its operations at a global level, including in respect of the reporting entity. EcoVadis evaluates how well we have integrated the principles of corporate social responsibility into our business and management systems and suggests areas for continued improvement.
- **Audits:** Bericap Inc. completed the last customer Social Compliance Audit in 2022 with an assessment score of GREEN – In Compliance. Bericap Inc. has also successfully completed a number of customer supplier audits in the financial year ending 30 June 2023.



## **Priorities across the Bericap Group**

Priorities moving forward are to better leverage tools to evaluate, assess and help improve suppliers that are identified as higher risk.

To ensure our Supply Chain and Materials teams remain up-to-date on the latest goals and issues related to responsible procurement, our HR and Sustainability teams will conduct in-depth training on forced labour and child labour within Bericap as a part of the larger set of training related to Bericap Group's Code of Conduct and Amcor Group's Code of Business Conduct and Ethics.

We will continue to assess, review and further develop our anti-slavery measures in order to ensure a workplace and supply chain free of forced labour and child labour.

## **Consultation, Approval and Attestation**

In preparing this Report, we consulted with a cross-functional working group of employees with responsibility for the oversight of plant management, procurement, human resources, sustainability, legal and risk processes across the business.

This statement is made in accordance with resolutions of the board of directors of Bericap Inc.

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 listed below my signature below. 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.

For and on behalf of Bericap Inc.

Full Name: Anthony Scire

Title: General Manager