

MODERN SLAVERY ACT 2015 TRANSPARENCY STATEMENT

1. INTRODUCTION

This statement is made pursuant to the Modern Slavery Act 2015 ("MSA") for the financial year ending 31 December 2021 by Greiner AG on behalf of the companies within its group of companies which are required to publish an annual statement.

Greiner AG is committed to ensuring that the business and supply chains of the Greiner companies are free from slavery and human trafficking.

To date, Greiner has established the Greiner-wide Greiner Compliance Management system, as certified by Austrian Standards for all entities worldwide, which assists in ensuring that our colleagues, business partners and customers comply with the Greiner Code of Conduct. Greiner Packaging International GmbH, one of the Greiner subsidiaries and a manufacturer of plastic packaging, works together with Ecovadis, a third-party sustainability ratings platform, to screen suppliers on sustainability criteria, which cover Discrimination and Harassment, Fundamental Human rights, Child & Forced Labor, and Working Conditions, to ensure sustainable and responsible procurement in our the supply chain.

Section 54 of the MSA places a legal requirement on large businesses such as some entities within Greiner to publish an annual statement of the steps that the organisation has taken during the previous financial year to ensure that modern slavery (including human trafficking) is not taking place in the business or supply chain of Greiner.

Greiner AG and its three divisional holding companies, namely, Greiner Packaging International GmbH (Greiner Packaging), Greiner Bio-One International GmbH (Greiner Bio-One), and NEVEON Holding GmbH (NEVEON) and some subsidiaries of these holding companies are required to produce an annual statement.

2. ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

2.1. Our organisation

Greiner is a manufacturer and supplier of a range of plastic and foam products in the biomedical, life sciences, sports, aviation, and consumer goods sectors.

Greiner AG is the parent company. In 2020, the group of companies had over 11,500 employees worldwide, operates across 34 countries and had an annual worldwide turnover of over €1.93 billion.

Our business is organised into three divisional holding companies:

- Greiner Packaging, a manufacturer of plastic packaging for both the food and non-foods sectors;
- Greiner Bio-One, a global player in the field of medical technology and life science, a leading producer of laboratory products; and
- NEVEON, one of the world's leading manufacturers of specialist foams.

2.2. Our supply chains

Greiner operates about 140 sites (including manufacturing sites) across 34 countries, some of which are considered to present a high risk in terms of the likelihood of engaging workers in modern slavery. We procure goods, components, raw materials, and services from a large number of suppliers based in a variety of countries, some of which operate in high-risk countries (according to amfori BSCI), as follows: Egypt, Bosnia and Herzegovina, Brazil, Bulgaria, China, Greece, India, Malaysia, Macedonia, Mexico, Romania, Russia, Serbia, South Africa, Syria, Thailand and Turkey. We also have agents, distributors, and joint ventures, some of which operate in these high-risk countries.

Many of the relationships we have with suppliers are direct and the nature of the goods and/or services they supply are critical to our commercial operations. To mitigate the potential effects of a business-critical supplier being found to engage in modern slavery, we use multiple suppliers for key raw materials, so that we can terminate our arrangements with any suppliers who are found to be carrying out such activities and are not willing to improve.

We outsource some of our IT, logistics, engineering, facility management, and staff leasing services and subcontract some of our support and maintenance services in respect of certain products to a number of providers in various countries. These countries are considered to be relatively low-risk in terms of the likelihood of engaging workers in modern slavery.

3. OUR POLICIES

As part of Greiner's commitment to ensuring that our business and supply chain are slavery-free, we have implemented the Greiner Code of Conduct and Greiner Code of Conduct for Suppliers and Business Partners.

Everyone who works for Greiner is obliged to sign a declaration that they will comply with the Greiner Code of Conduct.

The senior manager with overall responsibility for the Code of Conduct is the Group Compliance Officer of Greiner.

Implementation and management and day-to-day operation of the policies related to the Code of Conduct are carried out by the Local Compliance Officer of each Greiner company, the Division Compliance Officers, and the Group Compliance Officer of Greiner.

Our first-tier suppliers are required to:

- accept contractual obligations to comply with the Greiner Code of Conduct for Suppliers and Business Partners or to adhere to their own code of conduct, which must hold them to the same principles as covered by the Greiner Code of Conduct for Suppliers and Business Partners; and
- oblige suppliers who supply them with goods and/or services to also be bound by the same code of conduct or an equivalent set of principles.

The responsibility for assurance that our suppliers comply with the Greiner Code of Conduct for Suppliers and Business Partners lies with the Head of Purchasing of each Greiner company.

Greiner strives to embed respect for human rights, taking a zero-tolerance approach to slavery, by requiring all employees to sign the Greiner Code of Conduct. Compliance relevant colleagues are also required to undertake training and successfully complete a test on the principles of the Code of Conduct (see paragraph 4 for further details).

Greiner has also integrated a whistleblowing system, tell-greiner.com, accessible via the internet, which enables our employees, business partners, customers, and other stakeholders to report incidents of discrimination and/or human rights violations. Click [here](#) to access the whistleblowing portal.

Along with the Greiner Code of Conduct, the Greiner Internal Sustainable Sourcing Policy has been launched. Among numerous objectives, the main goals of the Sourcing Policy are to ensure that all suppliers employ sustainable business practices and that our personnel apply sustainability principles when purchasing goods and services. The policy covers principles that are grouped into three topics: social, environmental, and ethical, lists minimum requirements towards suppliers, and presents an escalation process in case of non-compliance. It is our goal that supplies which account to 80% of Greiner total purchasing volume are covered by the Greiner or an equivalent Code of Conduct.

4. TRAINING

Our colleagues working in responsible management positions and/or dealing with customers, suppliers, competitors, or authorities, in particular, CEOs and colleagues in sales and procurement, are deemed responsible for compliance with the Greiner Code of Conduct and must undertake mandatory training on its principles. Such colleagues are also required to undertake a test after the training, achieving a score of 80% or higher. Where this score is not attained, the relevant colleagues are required to re-sit the test until the requisite score is achieved.

Our training is reviewed at least biannually by our Compliance Board.

5. RISK MONITORING AND COMPLIANCE

As part of our initiative to identify and address risks of slavery in our supply chain some or all Greiner entities:

- Operate the Greiner Compliance Management system, as certified by Austrian Standards according to ISO 37301 (Fair Business Compliance Certificate), which assists us in ensuring that our colleagues, business partners, and customers comply with the Code;
- Have membership with a collaborative platform (currently Ecovadis) providing sustainability ratings for global supply chains until 2023. The objective of the Corporate Social Responsibility (CSR) rating methodology is to assess the quality of the CSR management systems. The assessment of the CSR practices is performed by sustainable development experts of this platform provider. The goal of the analysis is to assess the elements of the CSR management system. Scorecards are used to rate and monitor the environmental, ethical, and social practices of the members;
- Carry out audits on first-tier and second-tier suppliers, as appropriate. Audit trails allow for the relevant Greiner entity to identify which suppliers have been audited and whether the audit was pre-arranged or unannounced;
- Periodically review our supplier relationships, usually every 3 to 5 years, depending on the nature of the arrangement and/or supplier;
- Engage independent experts to carry out investigations on our suppliers, where appropriate. Suppliers in China are regularly inspected by a public labour authority;
- Undertake documented risk identification, management and reporting processes;
- Monitor and evaluate risks on an ongoing basis, assessing their probability of occurrence and likely level of impact, which will determine the nature of action taken;
- Carry out risk impact assessments, which are documented in reports and reviewed periodically, usually annually, by the relevant Greiner entity, to then update relevant risk management processes;
- Our business partners, including agents, consultants and sponsored persons, are bound by additional contractual obligations which require them to maintain full written records of their business activities, which must be provided to the relevant holding company or subsidiary of Greiner on demand, in addition to supporting the relevant Greiner entity with any questions and/or demands it may have;
- Reserve the right to terminate all agreements with a supplier with immediate effect where that supplier is found to be in breach of its duties to comply with all applicable laws, including those which prohibit slavery and forced labour;
- Only engage workers from reputable employment agencies and always obtain relevant certification before accepting a worker;
- Require suppliers and business partners to work to minimum labour standards by expecting them to pursue fair remuneration policies and in the absence of legal and/or collective bargaining regulations, pay wages based on industry-specific remuneration and benefits which are typical for the relevant industries and locations in which the relevant parties operate;
- Require suppliers and business partners to ensure that appropriate standards of living are provided for their employees and families;
- Encourage openness and support anyone who raises genuine concern in good faith under our tell-greiner.com whistleblowing system. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains; and
- Provide a code of conduct for suppliers and business partners which can be found here: [Greiner Sustainability - Suppliers](#);

6. NEXT STEPS

Following a review of the effectiveness of the steps we have taken to date to ensure that there is no slavery or human trafficking in our business or supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- Introduce the publication of reports, detailing supply chain evaluation from a sustainability and social responsibility perspective (collection and analysis of key statistics has already been undertaken for a sustainability report that will be published within the next financial year);
- Engage a third party corporate social responsibility analyst and software platform provider to develop rules, documents and procedures relating to the sustainable procurement summary to ensure sustainable and responsible procurement;
- Implement supplier assessment in all Greiner divisions to ensure proper risk mapping and evaluation. Set supplier performance improvement KPIs to track progress. Work together with suppliers on their corrective actions plan;
- Introduce and roll out an internal sustainable sourcing training for all sourcing relevant employees by mid-2022. Introduce KPI for tracking improvement.

SIGNED:

A handwritten signature in blue ink, appearing to be "M. [unclear]".A handwritten signature in blue ink, appearing to be "H. [unclear]".