



Modern Slavery Statement – November 2022

Introduction

This is the Modern Slavery and Human Trafficking statement of Sonoco Holdings UK Limited made on behalf of Sonoco Holdings UK Limited and all its UK subsidiaries (**the Sonoco UK Group**). This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and has been adopted by all subsidiaries as their respective slavery and human trafficking statement of the financial year ending 2023.

Although this is our first Modern Slavery Statement, during 2023, we have continued to work towards eradicating the risk of modern slavery in our supply chains and operations. This statement sets out the steps that the companies within the Sonoco UK Group have taken and continue to take to ensure that modern slavery or human trafficking is not taking place within their business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Sonoco UK Group takes a zero-tolerance approach to any form of modern slavery. We recognise that Modern Slavery is a growing global issue. The Sonoco UK Group is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our businesses and/or supply chains.

Organisation Structure

Sonoco Holdings UK Limited is part of the Sonoco group of companies (**the Sonoco Group**), an integrated packaging solutions organisation, creating unique customer experiences and enhancing the quality of products around the world.

The Sonoco Group employs approximately 23,000 employees across 300 operations in 36 countries.

Sonoco Holdings UK Limited (and its subsidiary companies) employ approximately 900 people in the UK.

Sonoco Holdings UK Limited is a private limited company registered in England and Wales (Company 03739940) and is the parent company of all of the Sonoco Group's subsidiaries in the UK, namely:

Sonoco Limited	00081296
Sonoco Cores and Paper Limited	05133800
Laminar Medica Limited	01233986
Sonoco TEQ Limited	01407996

Sonoco Holdings UK Limited is a wholly owned subsidiary of the Sonoco Products Company, which is incorporated in the United States of America.

Sonoco Limited is the primary trading entity, operating in the UK and Ireland.

This statement is to meet the requirement for Sonoco Limited and Sonoco Cores and Paper Limited to comply with Section 54, Part 6 of the Modern Slavery Act 2015.

Sonoco Limited has an annual turnover of **£60.6m** Sonoco Cores and Paper Limited has an annual turnover of **£49.7m** The Sonoco Group has a global annual turnover of **£121.8m**

Our supply chains

The Sonoco UK Group is committed to preventing modern slavery and human trafficking in its supply chains. We recognise that our suppliers are fundamental to our success and maintaining the positive reputation of all Sonoco UK brands. Pursuant to this, we require our suppliers to adhere to our business practices and ethical standards.



We have 1,300 direct suppliers worldwide, based in more than 25 countries. The vast majority of suppliers are based in Europe with the second most significant location being the USA. The key material categories are:

- Paper
- Laminates (made of a combination of paper, adhesives, aluminium, and resins)
- Labels (Printed mainly on the above)
- Materials (tinplate for container ends)
- Resins (for the self-manufacture of plastic components)
- Plastic components from third parties

Assessment of Modern Slavery risk within our supply chain

We intend to perform during 2023 a thorough risk assessment of our operations and supply chains in order to ensure that our efforts towards combatting modern slavery are targeted towards the highest risk areas. We intend to base this risk assessment not only on our own understanding of our supply chains, but also on publically available research and information which identifies particular industries and countries which pose the biggest risk of human trafficking and modern slavery. We intend to review our risk assessment (and update it if necessary) at least once every three years.

Due diligence processes and contractual controls

We have in place systems and procedures designed to:

- Perform due diligence on our existing and potential suppliers.
- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains; and
- Protect whistle blowers.

By way of examples:

Supplier Onboarding: Every supplier has to agree that they comply with our Sonoco Supplier Standards before they can become a supplier of Sonoco: <https://www.sonoco.com/about/supplier-resources/supplier-standards> . These standards cover a number of important areas including fair compensation; working hours; and both child & forced labour.

Memberships and affiliations: A number of Sonoco UK Group sites operate in accordance with the Ethical Trading Initiative Base Code. We additionally hold membership with SEDEX (the Supplier Ethical Data Exchange) and are independently audited to ensure our systems and standards are legally compliant, fit for our business and are sufficiently maintained.

Human Rights Policy Statement: Our global Human Rights Policy Statement reflects the Company's broader commitment to ethical business practices, which is embodied in Sonoco's "*Setting the Standard – Policy on Business Conduct*" These guidelines serve as the cornerstone of Sonoco's business ethics and compliance program and require Sonoco's Board of Directors, officers and employees to conduct business fairly, honestly and in compliance with all applicable laws, rules and regulations, including those protecting Human Rights. The Sonoco UK Group has appropriate mechanisms in place to internally monitor compliance with these guidelines and facilitate reporting of possible violations.

Training and review: The Human Rights Policy Statement is implemented through Sonoco's business ethics and compliance program, on which all employees are trained, and will remain posted on Sonoco's website at www.sonoco.com/. Sonoco's Global Human Rights statement was implemented and is regularly



reviewed by the Employee and Public Responsibility Committee of the Board of Directors, while managed by the Vice President – Human Resources.

Confidential reporting processes: We encourage our workforce to report any related concerns in confidence and provide our employees with access to an independent whistleblowing call line, manned by an external provider. We are committed to dealing with any suspected breaches of the Act seriously and with urgency. We are committed to reviewing this statement annually and shall continuously work to improve our systems and policies.

Due diligence: All potential suppliers go through a thorough due diligence process before any contracts are signed. Further, existing suppliers go through an audit every two years via a structured Vendor Questionnaire and related follow up audits.

Contractual controls and audit: We are in the process of requesting all of our suppliers to sign up to a voluntary code of conduct which is designed to protect their workforces from exploitation and guarantees their workers have minimum rights in terms of working hours and conditions. Our supplier contracts allow us to perform random unannounced visits to our suppliers' factories. During the last year we have sent over 150 questionnaires to our suppliers requesting information on the code of conduct they operate within their business.

Right to work checks: As part of internal due diligence practices, we have measures in place to ensure there is no slavery within our own workforce. Before onboarding a new employee, we require evidence of right to work in the UK.

Training

All of Sonoco's staff receive training in relation to the Human Rights Policy Statement, included in our business conduct training.

The effectiveness of our approach to combatting modern slavery

We measure the effectiveness of our approach to combatting modern slavery using Key Performance indicators to measure the percentage of suppliers conforming to the following targets:

- Percentage of suppliers certified according to an ethical audit
- Percentage of suppliers conforming to FSC (Including labour and slavery requirements).
- Percentage of suppliers which have signed a self-declaration about human rights / slavery

Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to repeat this process and continue to train our employees to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for 2022.

A handwritten signature in blue ink, appearing to read 'F. Giannolo', positioned above the printed name and title.

Francesco Giannolo
Vice President / General Manager - RPC Europe

Date: 01/11/2022