

This second statement is a joint statement by St. Johns Packaging Ltd. made pursuant to ***Fighting Against Forced Labour and Child Labour in Supply Chains Act*** (S.C. 2023, c. 9)¹ and St. Johns Packaging (UK) Ltd. made pursuant to *section 54(1) of the Modern Slavery Act 2015*² and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending on the 31st of December, 2024.

Introduction

St. Johns Packaging is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that its supply chains are also free from such practices. In 2023, the Government of Canada approved a new Act similar to the Act already in place in the United Kingdom. For this second report, we have maintained all activities implemented by St. Johns Packaging in accordance with the previous Act and have included further specific actions carried out in 2024.

Organisational structure and operations

St. Johns Packaging is a vertically integrated manufacturer of flexible packaging products that are sold to leading food and consumer product companies.

We are currently operating wholly-owned subsidiaries in Canada, the United States, Mexico, the United Kingdom, China and Vietnam, employing more than 950 dedicated employees in 10 different locations around the world. Our head office is located in Saint-Jean-sur-Richelieu, Quebec, Canada.

Further information is available on our website: <https://www.sjpack.com/>

Nature of our supply chains

Goods and services are purchased by St. Johns Packaging from a broad range of local and international suppliers in many jurisdictions in the world: Canada, United-States, Mexico, United Kingdom, Vietnam and China. St. Johns Packaging procures goods and services used in manufacturing of packaging, including resin, film, inks, adhesives, solvents. We also purchase pre-press materials, machinery, protective equipment and uniforms, IT and professional services as well as goods and services for our different facilities.

Policies relating to slavery and human trafficking

Our ***Modern slavery policy*** (CORP-POL-02-012), ***Code of Conduct for suppliers*** (CORP-POL-02-009) and ***Code of ethics and professional conduct*** (CORP-POL-02-001) for our employees reflect our commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains, and to acting ethically and with integrity in all our business activities and relationships.

The Code of ethics and professional conduct is communicated to all new employees and they are required to confirm their understanding and acceptance of the Code.

We ensure that our suppliers are aware of our policies and take appropriate measures to ensure that our suppliers adhere to the same high standards. Our Code of Conduct for suppliers requires them to comply with all local laws and to not engage in discriminatory, forced labour or child labour practices.

¹ Canada

² United Kingdom

Risk assessment

Due to the level of control we have over our operations as well as policies and processes we have in place, we consider that our supply chains represent the highest risks in respect of slavery and human trafficking. Based on the public information available^{3 4}, we have identified the following areas of potential concerns:

- **Ocean freight suppliers^{5 6}**: use of labour coming from low-cost countries at shipping ports of dispatch, 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.
- **Uniform and personal protective equipment suppliers⁷**: use of child labour, servitude and/or forced labour in the textile industry.
- **Waste management and processing^{8 9}**: use of forced or child labour especially with post-consumer and post-industrial waste sites.

Due diligence processes in relation to slavery and human trafficking

The following actions have been implemented at St. Johns Packaging to prevent modern slavery and human trafficking occurring in our operations and supply chains:

- **Code of ethics and professional conduct**: In the conduct of the Company's business, we expect every employee, officer and director to meet strict standards of honesty, integrity and fairness, and to avoid committing any act that may expose St. Johns Packaging to potential embarrassment or liability. This Code applies to all employees, officers and directors of our business and prescribes various rules and guidelines for St. Johns Packaging. The Code of ethics and professional conduct is communicated to all new employees and they are required to confirm their understanding and acceptance of the Code.
- **Supplier Code of Conduct**: our Code of Conduct sets out our expectations of our suppliers regarding several important issues relating to forces and child labour. Under no circumstances, a supplier may use or benefit from forced labour or require production from children or unpaid labourers. Suppliers are required to sign the Supplier Code of Conduct.
- **Supplier Ethical Data Exchange**: our subsidiaries in United Kingdom, China and Vietnam are members of SEDEX (<https://www.sedex.com>), a non-profit organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains. Membership requires regular self-assessment of labour conditions, Health & Safety, Environment and Business Ethics which is shared with customers on the platform encouraging transparency and continuous improvement throughout the supply chain. In 2024, our plants in the United Kingdom and Vietnam were audited by the SMETA (Sedex Members Ethical Trade Audit) program demonstrating that our practices are ethical and compliant with their requirements.
- **Report form**: we take specific measures to protect people who report an issue of modern slavery. We have set up a reporting form which is available on our Intranet, where employees can easily report any suspected incident or situation related to modern slavery within the company and/or any supplier.

³ [Global-Slavery-Index-2023.pdf \(walkfree.org\)](#)

⁴ [GBCAT – Toolkit for Corporate Suppliers – Prevention of Modern Slavery – June 2021 \(bsr.org\)](#)

⁵ [Shipping Roundtable Meeting Report May 2019.pdf \(ihrb.org\)](#)

⁶ [The Dark Underbelly of the Seas: Human Rights Abuses, Forced Labour, and Seafood Certifications | Human Rights at Sea](#)

⁷ [Ethical procurement and forced labour: Committee of the Whole—May 19, 2022 - Canada.ca](#)

⁸ [Children and digital dumpsites: Smaller hands, cheaper labour - the crisis of e-waste and children's health \(who.int\)](#)

⁹ [Eradicating Child Labor in Informal Waste Collection and Improving Adult Working Conditions | International Organization for Migration \(iom.int\)](#)

- **Customers audits and questionnaires:** St. Johns Packaging regularly respond to customer specific self-assessment questionnaires covering modern slavery and ethical trade. In 2023 in the UK as part of the Supplier Monitoring Program, the supplier self-assessment questionnaire was extended to include questions on ethical trade.

Hiring Temporary Foreign Workers in Canada

Since 2022, we have hired approximately sixty temporary foreign workers to fill our workforce in our Canadian plants through the TFWP¹⁰. As part of an audit conducted in 2024 by Employment and Social Development Canada (ESDC) to verify our company's compliance with the conditions and commitments of the Immigration and Refugee Protection Regulations (IRPR), we received a letter of compliance confirming our actions meet all the conditions and commitments related to this program.

Staff training

We provide training to all key employees to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively operate our policies and procedures aimed at mitigating this risk.

In the United Kingdom the Code of ethics and professional conduct is communicated to all new employees and they are required to confirm their understanding and acceptance of the Code. In addition, key personnel have undertaken Human Rights Awareness Training covering a range of human rights issues the organisation and managers could face including, forced labour, child labour, freedom of association & discrimination.

Future action

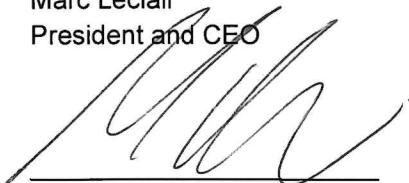
St. Johns Packaging aims to take further steps in the near future to raise awareness and mitigate the risk of modern slavery within our operations and supply chain such as:

- In Canada all employees will conduct awareness training to help them identify the signs of modern slavery and how to report it.
- We will continue the process of risk assessment and extend the use of Supplier Questionnaires to support this process.

This statement is made in accordance with a resolution of the Board of Directors of St. Johns Packaging Ltd.

Signed in Saint-Jean-sur-Richelieu, Québec, Canada, this 25th of April, 2025.

Marc Leclair
President and CEO



¹⁰ Temporary Foreign Workers Program