



Human and Labor Rights Transparency Statement 2024

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1. Introduction

Elopak is committed to conducting business in a responsible manner and account for social and environmental aspects in our operations and value chain. Elopak has a zero-tolerance policy for any form of forced labor, slavery or human trafficking. Elopak respects and supports internationally recognized human rights and labor standards, including those outlined in the International Bill of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work (Core Labor Standards).

Elopak entities are subject to human and labor rights-related reporting obligations in jurisdictions where they operate. This includes:

- Elopak ASA and its consolidated subsidiaries (**Elopak**) pursuant to the Norwegian Transparency Act;
- Elopak Canada Inc. (**Elopak Canada**) and Elopak Inc. (**Elopak USA**) pursuant to the Federal Government of Canada’s Fighting Against Forced Labor and Child Labor in Supply Chains Act; and
- Elopak UK Limited (**Elopak UK**) pursuant to the UK Modern Slavery Act.

This Human and Labor Rights Transparency Statement (Statement) provides a combined reporting fulfilling all regulatory requirements. The Statement is provided on a joint basis, covering all the activities of Elopak entities during the previous fiscal year, from January 1, 2024, to December 31, 2024.

2. Elopak’s business and supply chains

2.1 Our business

Elopak is a leading global supplier of carton packaging and filling equipment, and technical services. Founded in Norway in 1957, we employ approx. 2 850 people in over 30 countries and operate 12 manufacturing units globally. Each year, we sell approx. 16 billion cartons across more

than 70 markets. Elopak ASA is listed on the Oslo Stock Exchange. We develop and supply fiber-based packaging under the following product brands:

- Pure-Pak® cartons for fresh and aseptic liquid food
- Roll Fed packaging material for aseptic liquid food
- D-PAK™ cartons for non-food liquids such as home and personal care products

All our product brands are made using renewable, recyclable, and sustainably sourced materials, providing natural and convenient alternatives to plastic bottles.

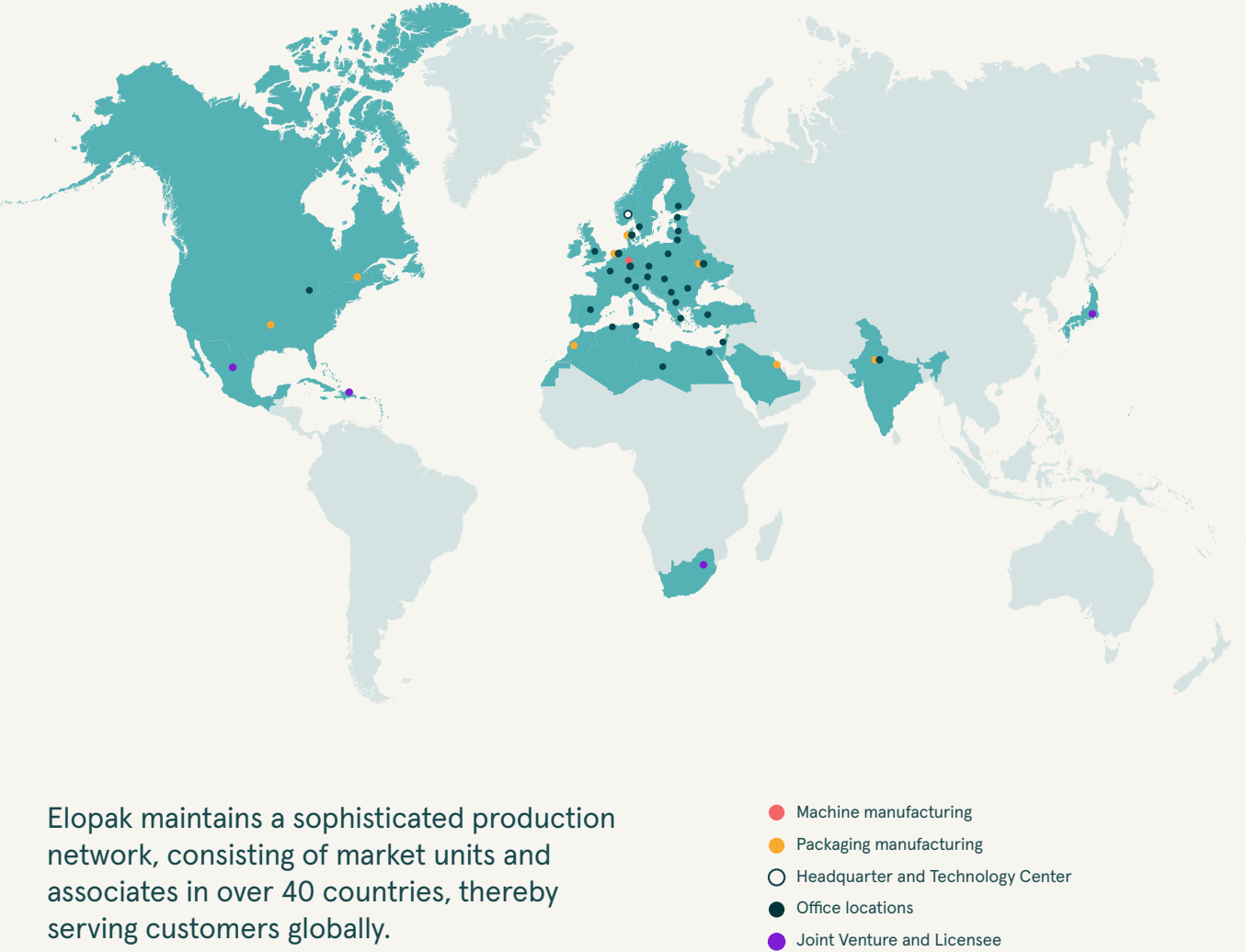
Elopak UK

Elopak UK’s principal activities are the selling of beverage cartons, and installation and maintenance of equipment required to fill such cartons. The installation and maintenance of equipment at our customers’ sites is undertaken by Elopak engineers from the UK, European companies in the Elopak Group or third-party engineering companies in the UK or Ireland. Elopak UK also sells closures in the UK and Ireland.

Elopak Canada and Elopak USA

Elopak Canada’s principal activities are the manufacturing and selling of carton packaging, as well as selling and installing filling machines in Canada. Elopak Canada operates a state-of-the-art production facility in Boisbriand (Québec), which produces more than 2 billion carton packaging per year for various liquid food, such as liquid dairy products, liquid eggs, juices, plant-based beverages, and water. Elopak Canada also sells closures in Canada.

Elopak USA’s principal activities are the distribution of carton packaging, closures, and filling machines in the USA. They also provide customer service, meaning the installation and maintenance of equipment, including spare parts, at customer sites in Canada and the USA.



Elopak maintains a sophisticated production network, consisting of market units and associates in over 40 countries, thereby serving customers globally.

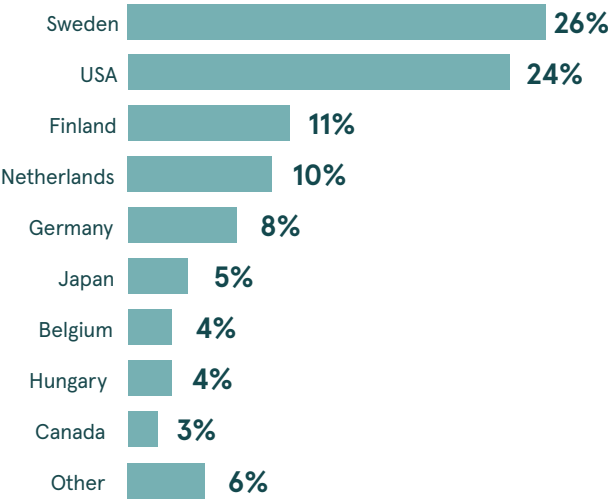
Figure 1. Elopak global presence, including joint ventures

2.2 Our supply chains

Elopak’s supply chains are global. Key raw materials (board, polymers, aluminium, and inks and solvents) needed to produce our cartons are mainly sourced from Europe (Sweden, Finland, Germany, the Netherlands, Belgium) and the USA. Closures are sourced from third-party suppliers in Europe (Hungary, Germany, Spain, Luxembourg, France), Canada and the USA. Filling machines and customer equipment, including related parts, are primarily sourced from Europe and Japan, with additional supply from countries like China.

The Group Procurement function at Elopak consists of central Group Category Managers, procurement excellence resources, including local purchasing teams. Key raw materials are sourced centrally, while equipment, components, parts, and services to our customers, as well as goods and services delivered to our production sites, are sourced both centrally and locally.

Elopak top sourcing countries



Elopak UK

Sourcing is managed by the Group Procurement function as per description of our supply chains above. Cartons are produced at Elopak production plants in Denmark and the Netherlands. Closures are sourced from third party suppliers in Germany, Luxembourg, Hungary and Spain.

Elopak Canada and Elopak USA

For both Elopak Canada and Elopak USA, key suppliers are managed by the central Group Procurement function. This includes all raw material and direct suppliers accounting for the majority of group spend. Local, less critical suppliers delivering goods and services directly to our sites, are managed by local procurement teams. For the USA and Canada specifically, board suppliers are located in the United States. Closure suppliers span across the USA, Canada, and Spain. Ink and solvents are sourced from suppliers in Canada, Sweden, and the USA. Packaging is sourced from Canada and the USA. Transport suppliers operate in Canada and the USA.

3. Governance

Elopak’s Board of Directors (Board) have the ultimate oversight responsibility. The Elopak Management, chaired by the Chief Executive Officer, is ultimately responsible for day-to-day operations and Elopak’s strategy, goals, actions, and investments. Global ownership of human rights sits with the Chief Financial Officer.

The ESG Council is responsible for managing, coordinating and reporting on ESG topics, including human rights. The Council is chaired by the EVP for Product and Development and includes Elopak Management members from different business areas: human resources, packaging and procurement, finance and IT, marketing and communications, and sales. Additional

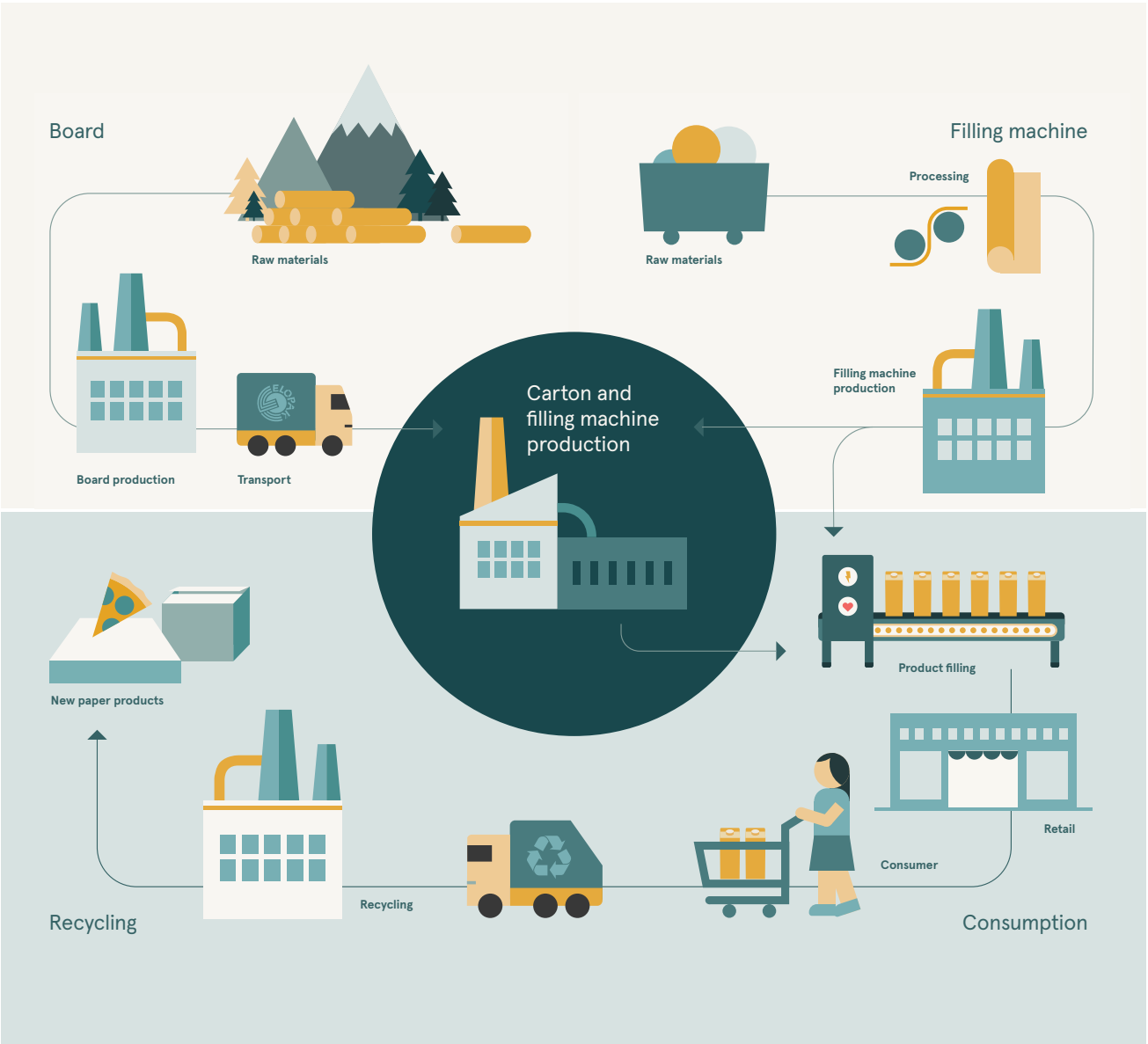


Figure 2: Elopak value chains

representatives participate in the Council meetings when deemed necessary. Human rights matters are discussed frequently with Elopak Management and are reported on regularly to the Board Audit and Sustainability Committee (BASC) as well as to the Board.

According to Elopak’s governance model, it is a line responsibility to assess and address human rights risks in daily operations. In practice, this means that the business incorporates a risk-based approach to human rights and their activities follow our policy and internal requirements on human rights due diligence. At the same time, the business is responsible for reacting to potential human rights risks and escalating issues when needed. Group Legal and Compliance supports the business and corporate functions in their human rights due diligence efforts. Our Group Procurement function holds the overall responsibility of ensuring a robust sourcing process.

4. Policies, guidelines and due diligence processes

4.1 General

Performing due diligence is a key part of Elopak’s efforts to respect fundamental human rights and ensuring decent labor and working conditions. Due diligence is a process implemented to identify, prevent, reduce, and document our handling of any negative impact on human rights and decent working conditions. Our approach to human rights due diligence in own operations and our supply chains is based on the UN Guiding Principles on business and human rights (UNGPs) and the OECD Due Diligence Guidelines for Responsible Business Conduct. This includes measures to prevent and reduce the risk of slavery, forced labor, child labor and human trafficking in any part of our operations, supply chains and business relationships.

The sections below further describe the main steps in our human rights due diligence approach. This includes our policies and due diligence processes in relation to forced labor and child labor, and steps taken to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

4.2 Embed responsible business conduct in the organization

Human rights concerns are comprehensive in scope and require a holistic approach across multiple business areas. Hence, we strive to integrate human rights considerations into our global business processes, in our own operations, our supply chains and our business relationships.

Elopak conducted a double materiality assessment in 2023 to identify our impacts on society and the environment, as well as the impact various external factors may have on Elopak (risks and opportunities). Refer to [Elopak’s annual report 2024](#) for further information.

Management system

Elopak has embedded human rights due diligence and respect for decent labor and working conditions in our management system through principles and requirements outlined in our governing documents. This includes the following key documents:

- **Code of conduct:** The code of conduct reflects key focus areas, outlining Elopak’s commitments for applying ethical business practices. It provides guidance on expected behavior in Elopak and in interactions with our stakeholders, including a zero-tolerance approach towards harassment, corruption and other illegal or unethical business conduct. The code of conduct covers areas such as anti-corruption and bribery,

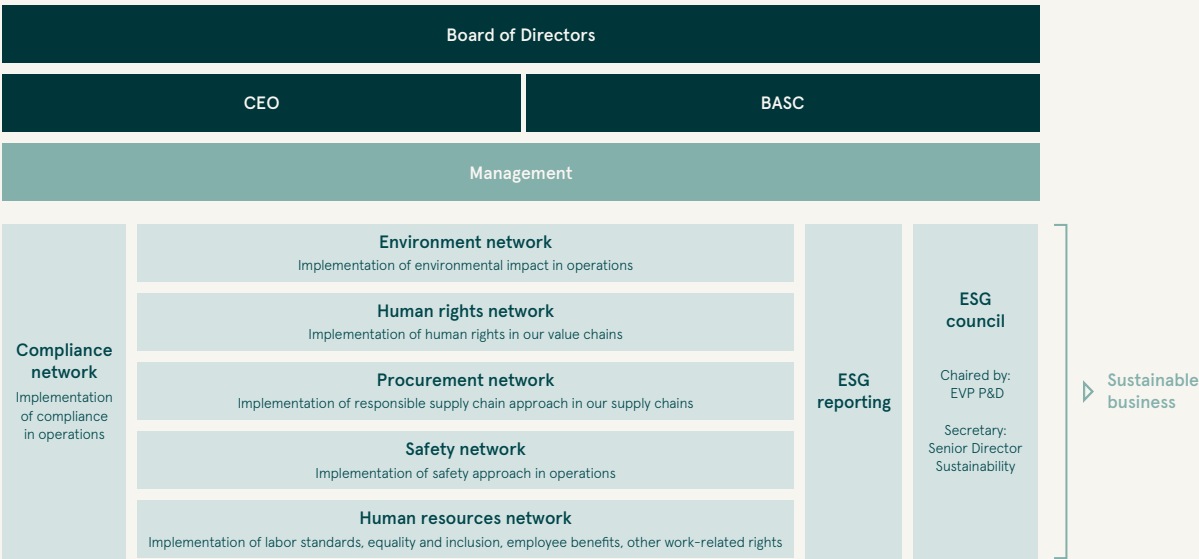


Figure 4: Elopak's ESG governance model

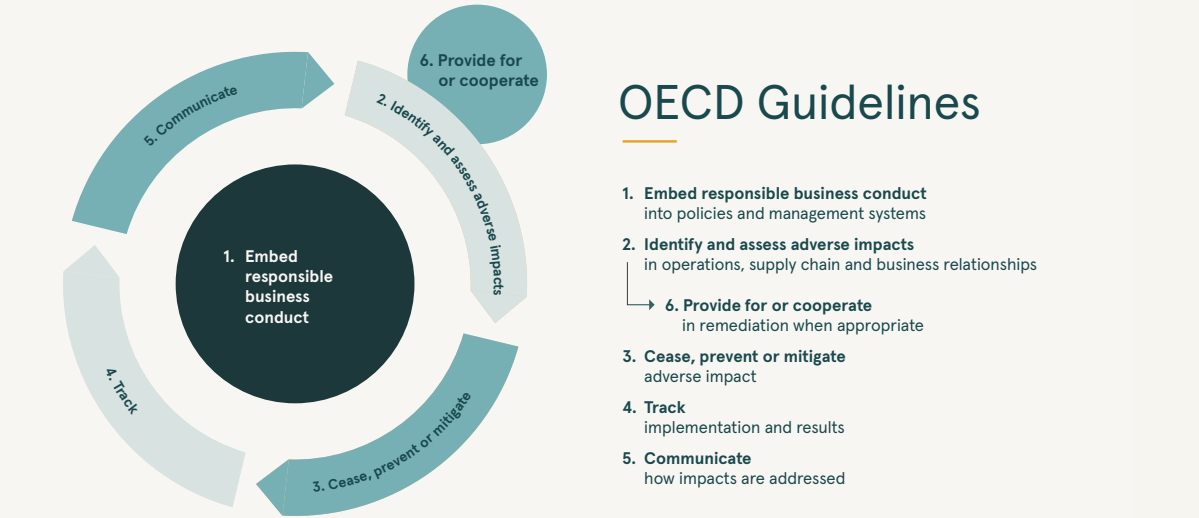


Figure 5: OECD Due Diligence Guidelines for Responsible Business Conduct within human rights in Elopak

business partner integrity, human rights, conflict of interest, gifts and hospitality, anti-money laundering, fair competition, insider trading, and sanctions and trade compliance.

- **Supplier code of conduct:** It outlines our expectations and requirements for suppliers concerning anti-corruption, business ethics, human and labor rights, health and safety, and environment. It is based on the ten principles of the UN Global Compact, the UN Declaration of Human Rights and core ILO conventions.
- **Human rights policy:** The policy outlines our commitment to respecting and supporting internationally recognized human and labor rights and the principles for how we approach human rights risks in our operations, supply chains and business relationships.
- **Business partner integrity procedure:** The procedure describes our Integrity Due Diligence (IDD) process ensuring the integrity of prospective, new, and existing business partners, and the monitoring of these. The IDD is divided into three risk levels, where each level specifies the appropriate due diligence process. The document is supported by Elopak’s Country Watch List.
- **Reporting concerns and internal investigation procedure:** The procedure describes a standardized process for how our employees can report concerns and how we investigate and handle those concerns in Elopak. As stated in the procedure, all concerns are adequately investigated within a reasonable time in a fair, confidential, and objective manner in line with the EU Whistleblower Directive.
- **Responsible supply chain standard:** It outlines the processes and tools for ensuring supplier integrity, executing due diligence, and promoting responsible supply chain practices in alignment with the UNGPs and OECD guidelines. It includes steps for identifying and addressing non-compliance, such as inherent risk assessment, IDD process for new and existing suppliers and further

engagement with suppliers to develop and implement corrective action plans and mitigating actions.

Our commitments and principles concerning due diligence and promoting respect for human rights and decent working conditions are also outlined and embedded in other parts of our management system, in the following policies and procedures:

- Anti-Corruption policy,
- Safety policy,
- Diversity, equity and inclusion policy,
- Standard for processing of personal data,
- Procurement policy,
- Supplier qualification procedure (including minimum requirements for supplier integrity due diligence),
- General terms and conditions of purchase, and
- Sustainability policy.

Risk management

Human rights and decent working conditions are embedded in Elopak’s risk management processes and an integrated part of our global compliance program. This means that the human rights risk assessment is part of the overall risk assessment for ethics and compliance in Elopak. Based on a self-assessment questionnaire (focusing on relevant provisions of UN Human Rights Treaties, ILO fundamental conventions and the UNGPs), we intend to identify, prevent, mitigate, report, and follow-up the risk of negative impacts on human rights and decent working conditions.

4.3 Identify and assess adverse impacts
Prioritize

A high level risk assessment is conducted for the entire supply chain to identify key risk areas and categories to prioritize efforts. Key risk factors considered are the product/service category, country of operation and commercial exposure. This method helps Elopak focus

on important countries and categories (specifically raw materials, transport, filling machines and equipment, maintenance, catering and cleaning services).

In addition, risk assessments are performed as part of the qualification and IDD process for new and existing suppliers. The level of qualification and IDD checks performed is dependent on the inherent risk assessment and risk profile of the supplier. The risk parameters mainly consider;

- product/service category (industry/activity),
- country of operation (country risk),
- expected commercial exposure and Elopak influence, an known red flags.

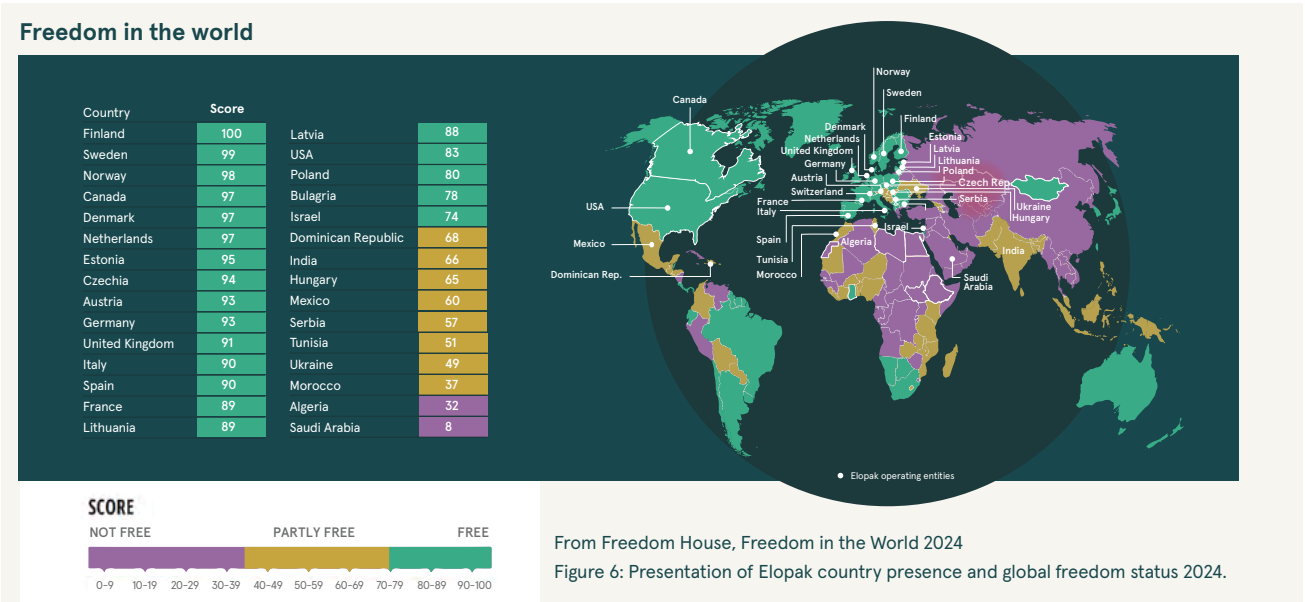
Elopak is present in certain countries with high inherent human rights risk as illustrated in the table below. The score is based on Freedom House’s report “[Freedom in the World 2024](#)” where 210 countries and territories

around the globe are assessed and scored on a series of indicators in categories of political rights and civil liberties.

For Elopak’s own operations, the prioritized areas currently include health and safety and decent working conditions. For our business partnerships and supply chain, additional prioritized areas include forced labor in supply chains.

Identify and assess

As referred to in the previous section, the Elopak Group collects human rights risk data and considerations from our legal entities through a self-assessment questionnaire. Based on the input, we also seek to identify the rights holders and vulnerable populations impacted. We assess severity (scale, scope, and irremediability) and likelihood of occurrence. The assessment focuses on the probability of Elopak causing, contributing, and



being linked to adverse impacts in our own operations, supply chains and business relationships. The risk score, and a set threshold, constitutes the foundation for further due diligence and the identification of mitigating measures in combination with global human rights indexes. Human rights risk workshops are facilitated, allowing stakeholders representing the organization to assess and align on the risks.

4.4 Cease, prevent or mitigate adverse impacts

In Elopak, we seek to prevent or mitigate negative human rights impacts that are directly linked to our operations and our business relationships. We do this by working proactively with our suppliers and business partnerships.

Integrity due diligence process

Our Business partner integrity procedure, supplemented by Elopak’s Country Watch List, describes our IDD process, ensuring the integrity of prospective, new, and existing business partners, and the monitoring of these. The purpose of the IDD process is to prevent, detect, and address any integrity risks with our business partners, including violations of human rights, and to mitigate these.

All suppliers are subject to a qualification process and are expected to commit to our business conduct principles as outlined in our global supplier code of conduct. As part of the supplier qualification and onboarding process, all new suppliers undergo a pre-qualification assessment including the signing of the supplier code of conduct. In addition, Elopak conducts a risk-based IDD process of our suppliers to ensure that their background, reputation, and abilities meet our standards as outlined in our supplier code of conduct. This process includes screening for potential risks related to human and labor rights.

The extent of qualification and IDD checks performed depends on the criticality and risk profile of the supplier. Suppliers identified as having medium/high or high inherent risk (based on defined supplier criticality thresholds) must undergo screening through EcoVadis, and/or via a supplier self-assessment questionnaire and desktop screening via background screening tool. For certain high-risk suppliers and regions, we engage an external partner to perform in-depth third-party IDDs. Based on the screening and assessment results, the supplier may be subject to further assessments, engagement, follow-up actions, and potentially on-site audits.

Additional mitigating measures with suppliers include adequate contractual clauses on responsible business conduct in supplier contracts. Contractual clauses can allow Elopak to require the contractual party to address and rectify violations of human rights or, if deemed necessary, terminate a contract. As part of contractual clauses with suppliers, we include audit rights which give us the possibility to verify their compliance with the commitments outlined in our supplier code of conduct. In 2024, prioritized supplier categories underwent IDDs for potential and new supplier qualification. In-depth IDDs were conducted for critical suppliers from high-risk countries such as China, with the support of third-party experts. In-depth IDDs were also conducted for key suppliers and traders supplying to our site in India. No instances of forced labor, child labor, or significant human rights violations were identified during these assessments. The global supplier code of conduct was further implemented for local suppliers at sites in India, Morocco, and Saudi Arabia.

Training, communication and awareness building

At Elopak, training, communication, and awareness-raising are part of a continuous process and preventive

measures to mitigate the risk of negative impacts on human rights and decent working conditions. This includes preventing any violations such as slavery, human trafficking, forced, and child labor.

Elopak key documents are published on our website and in our management system, ensuring they are accessible to all employees and other important stakeholders. Human and labor rights, including diversity, equity, and inclusion, are dedicated sections of the code of conduct and incorporated in the annual mandatory training for all employees. We also hold human rights capacity building meetings with key suppliers to raise awareness, evaluate their practices, and gain a better understanding of their significant human rights risks. This helps us to mitigate and manage these risks more effectively.

In 2024, approx. 2 000 of our own employees, and all members of the Elopak Management and the Board, successfully completed the CoC e-learning training. Additional targeted risk-based training was facilitated on business partner integrity and corruption and bribery. Moreover, training was conducted on responsible supply chain principles and practices, the supplier qualification and due diligence process, and the requirements of the Norwegian Transparency Act for targeted procurement teams, including local teams at our sites in Canada, USA and India, as well as for the group Category Managers.

Elopak Canada and Elopak USA leaders and managers received training on the Fighting Against Forced Labor and Child Labor in Supply Chains Act. The training covered key topics related to the legislation and what Elopak Canada and Elopak USA can do to avoid forced and child labor. In 2024, two training sessions were held for managers, supervisors, and employees in finance, procurement, human resources, and manufacturing. In total, 23 employees were trained by a qualified partner.

Engaging with unions and stakeholder engagement
Elopak values its ongoing dialogue with key stakeholders on environment, social and governance topics throughout the year. Our main stakeholders include customers, investors, banks, employees, unions, non-governmental organizations (NGOs), governments and national authorities. In Europe, we collaborate with unions and union members via the European Works Council (EWC). EWC represents the majority of our sites (regulated by law) and representatives from the Elopak Management hold bi-monthly meetings with the elected EWC Working Party. Additionally, an annual meeting is held where all members of the EWC are represented. Outside of Europe, we have separate dialogues and follow-up with unions at each local site. In Elopak, 61% of our workforce is covered by local work councils and/or national collective bargaining agreements, where it represents approx. 67% for Elopak Canada. No employees are covered by collective bargaining agreements in our market unit in Elopak UK.

**4.5 Track implementation and results
Inspections, reviews, and audits**

Dependent on the outcomes of the initial screening and assessment, business partners identified as high-risk may undergo more detailed evaluations. In cases where the risk is deemed exceptionally high, on-site audits may be conducted.

Supply chains

Where suppliers do not meet our standards, we work with them on corrective actions to better understand, mitigate and remediate potential gaps. Re-assessments are conducted approximately bi-annual depending on results of the initial assessments and screening. If the non-compliance is material or if the supplier, after several requests, does not show willingness or ability to

improve or remediate the non-compliance, we reserve the right to terminate the business relation.

Own operations

From time to time, Elopak Canada is audited by approved third party auditors conducting Sedex Members Ethical Trade Audit (SMETA) audits. SMETA audits help us review and maintain high standards related to health and safety and human rights, including forced and child labor, discrimination, harassment, and abuse in its operations This independent audit is a way of validating that forced and child labor is not part of our operations.

Business relationships

Elopak performs annual compliance reviews of its joint ventures. The reviews include human rights topics and are conducted as a desktop and/or on-site review, allowing Elopak to obtain insights on key risks and ensure applicable follow-up and monitoring. In 2024, Elopak conducted an on-site external compliance review of our joint venture in the Dominican Republic, and a desktop compliance review was conducted for our joint venture in Mexico and our jointly owned entity in India, controlled by Elopak.

4.6 Provide for or cooperate in remediation when appropriate

Reporting of concerns and grievance mechanisms

The procedure for reporting concerns and internal investigation describes a standardized process for how our employees can report concerns and how we investigate and handle those concerns in Elopak, irrespective of the channel used for notification. As outlined in our code of conduct, employees are encouraged to speak up about ethical issues and report any suspected violations of our code of conduct, laws and regulations, and material breaches of our policies

and procedures. Concerns of misconduct or grievances are reported through defined internal channels or through our [whistleblower helpline](#) on the Elopak website, which is also available to external stakeholders. The helpline is hosted by an independent service provider and is confidential, anonymous, and available in multiple languages. Elopak strictly prohibits retaliation against anyone who raises a concern in good faith or participates in an investigation.

Remediation

We are committed to providing remediation for identified negative impacts or harm to people caused by our operations, through our supply chains, or business relationships.

In the case a negative impact is identified where remediation is required, Elopak will assess the circumstances on a case-by-case basis. Our approach includes addressing the negative human rights impact on the individual, worker, and community that we have caused or contributed to. The remediation measures incorporated will be reviewed throughout the year to assess the effectiveness of the actions and the need to adjust.



5. Salient risks and remediation

5.1 General

In this section, we attempt to describe main risks and work conducted in 2024 to address adverse impacts on human rights and decent working conditions. We provide information on selected salient risks to inform how we apply our human rights requirements. Here, we highlight our salient risks and their impact, actions taken and expected outcome from the actions. We have structured the information according to risks into (5.2) our own operations and (5.3) our suppliers and business partnerships.

In section 5.4 we have included information on our particular assessments concerning forced or child labor, slavery and human trafficking, including information regarding remedial steps and assessment of the effectiveness of the measures implemented.

5.2 Identified salient risks in own operations

For our own workforce, we consider the main risks to be related to health and safety and decent working conditions.

Issue	Description and impact	Rights holders	Actions taken	Outcomes
<div>- Right to health and safety</div> <div>- Decent working conditions</div>	Elevated temperatures in our manufacturing units, especially during the summer months, and performing manual labor with machinery that can result in workplace accidents. Further, high temperatures can result in fatigue and other physical reactions for a limited number of manufacturing operators.	<div>- Elopak employees,</div> <div>- Contracted workers at Elopak sites</div>	At every production plant we have dedicated Health and Safety Officers with the role of supporting local organizations towards safe and healthy working conditions. These are members of a Group safety network where topics such as risks are discussed, to conclude best practices.	No recordable injuries are registered as the result of elevated temperatures. The situation is monitored where and when relevant.
			Examples of measures to mitigate risks originating from elevated temperatures: <div>- Work rotation to decrease exposure to heat.</div> <div>- Regular breaks</div> <div>- Clothing with cooling effect</div> <div>- Easily available drinking water</div> <div>- Modifications to buildings</div>	
<div>- Right to health and safety</div> <div>- Decent working conditions</div>	Risk that business units do not meet satisfactory safety requirements according to Elopak standards, meaning that there is an increased risk of incidents.	<div>- Elopak employees,</div> <div>- Contracted workers at Elopak sites</div>	Dedicated health and safety program to support our vision of zero incidents. Our program is governed by Group Safety and integrated to each site to fit with local needs. This includes, to a certain extent, external contracted workers.	We are conscious of operations and areas that need special attention, and we can measure that our initiatives are resulting in positive changes.
			Currently, the program’s focus is on behavior and skills, technical safety, and areas identified through analysis of internal incident data. This way, we also identify sites or areas that need additional attention and specifically tailored programs.	

Table 1: Identified salient risks in own operations.

5.2 Identified salient risks in own operations cont.

Issue	Description and impact	Rights holders	Actions taken	Outcomes
- Decent working conditions/ terms of employment	In entities where Elopak has a higher rate of contracted workers, there is a risk related to working conditions and conditions of employment. These risks are mainly linked to our sites in Morocco and Saudi Arabia, where the percentage of contracted workers represent 66% and 29% of total workforce, respectively.	- Contracted workers at Elopak sites	Morocco The contracted workers receive salaries in line with the current remuneration level in the country.	Morocco An integration plan for employing contracted workers from the contracting agency is in place. In 2024, 6 employees were permanently employed by Elopak Morocco.
			Local HR monitors that social security benefits are granted and followed up with the local contracting company. In 2023, Elopak Morocco adopted an open-door policy specifically for contracted workers, allowing the workers to easily raise issues, such as any unwanted behavior, unfair treatment, and unjustified wage deductions.	Any issues with the local contracting company are effectively identified and remediated through the open-door policy introduced.
			Elopak Morocco organizes annual mandatory in-person code of conduct training in local language for all employees, including contracted workers.	
			Saudi Arabia In Saudi Arabia, we have foreign guest workers, which have employment contracts with a contracting agency. Guest workers, or migrant workers, is customary practice in Saudi Arabia. We continuously monitor any negative impact. We work to limit the numbers of contracted workers (guest workers) and seek opportunities to hire local nationals, where possible. Nevertheless, contracted workers are currently needed to ensure appropriate plant capacity.	Saudi Arabia In Saudi Arabia, the close follow-up with the contracting company has reduced the risk of breaches to decent working conditions, including any unjustified wage deductions.

Table 1: Identified salient risks in own operations.

Elopak is present in Ukraine and Israel. Hence, in addition to salient risks outlined above, we give further information on our activities in these respective countries below:

Issue	Country	Our activities
PrJSC Elopak Fastiv	Ukraine	<p>Elopak has a sales office in Kiev and a production facility in Fastiv, approx. 75 km southwest of Kyiv, with a total of 150+ employees in Ukraine.</p> <p>The plant is operational with flexible production to supply customers in Ukraine in support of efforts to maintain supplies of essential goods in the country but also exports to Eastern Europe. Due to the full-scale Russian war, a state of martial law is in effect. This implies restrictions of men leaving the country, and the probability of men being commanded to military service is significant. The law allows Elopak to temporarily reserve part (50%) of the workforce from military service, although with requirements for cause. Elopak is continuously assessing the impact on our people, business, and assets through regular business planning and follow-up of the local team.</p>
Elopak Israel AS Branch Office	Israel	<p>Elopak Israel provides sales and distribution services within the Group. Elopak Israel has a sales office in Kibbutz Yakum, approx. 21 km north of Tel Aviv with 11 employees working on activities related to sales and technical service. The entity performs customer interface of Elopak’s products and services offered in the local market and coordinates all supplies to its customers. In addition, Elopak Israel performs local marketing, advertising functions, invoice customers and collect payments. Elopak Israel negotiates and concludes contracts with customers within the policies and guidelines set for the region, and purchases finished Elopak products from related parties to sell and distribute in the local market.</p> <p>In March 2024, the Norwegian government reiterated its position on Israel’s settlement policy on occupied land by advising Norwegian companies companies not to engage in business activity serving to maintain illegal Israeli settlements. Elopak engaged external counsel to assess Elopak’s business activity and concluded that operations are compliant with the recommendation.</p>

Table 2: Status in countries in which Elopak is present and there was ongoing violent conflict during 2024.

5.3 Identified salient risks for suppliers and business partnerships

Our focus areas in terms of supply chain risk management are outlined below:

Issue	Description and impact	Rights holders	Actions taken	Outcomes
- Migrant workers / forced labor	Risk of involuntary, forced labor, modern slavery in transport, cleaning and other “basic services” of migrant workers, which leads to direct or indirect human rights violations or human trafficking, including other unethical conduct.	- Workers in supply and value chain	<p>Our supplier code of conduct, which addresses key human rights issues including forced labor, was implemented for local suppliers at our sites in Morocco, Saudi Arabia, and India.</p> <p>In 2024, prioritized supplier categories and suppliers with medium/high and high risk (including transport and cleaning services) underwent IDD for potential and new supplier qualification according to our procedures, including:</p> <ul style="list-style-type: none">- Sign/accept Elopak supplier code of conduct- Assessed via Self-Assessment Questionnaire (SAQ)- Background screening via external tools- Contractual clauses on responsible business conduct in agreements- Onboarding in EcoVadis- Supplier dialogue and follow-up <p>In-depth IDDs were conducted for critical suppliers from high-risk countries such as China, with the support of third-party experts. In-depth IDDs were also conducted for key suppliers and traders supplying to our site in India. No instances of forced labor, child labor, or significant human rights violations were identified during these assessments.</p>	No instances of forced labor, child labor, or significant human rights violations were identified.
- Youth or child labor - Migrant workers / forced labor	There is a risk that workers in the supply chain experience conditions of forced labor and are subject to unfavorable employment terms, wages and working hours for certain raw materials with complex supply chain originating from high-risk countries.	- Workers in the value chain	<p>Our supplier code of conduct, which addresses key human rights issues including forced labor has been implemented for all raw material suppliers.</p> <p>Most of our raw material suppliers are monitored on the EcoVadis platform and/or undergo additional IDD, including self-assessment (SAQ), background screening, and contractual clauses on responsible business conduct and human rights in agreements. In addition, we conduct supplier engagement meetings and follow ups.</p> <p>During 2024, in-depth IDDs by an external third party were conducted for key suppliers (including raw materials) and traders supplying to our site in India.</p>	No instances of forced labor, child labor, or significant human rights violations were identified during these assessments.
- Youth or child labor - Migrant workers / forced labor	Risk of forced labor due to sourcing of spare parts, machines for coating and converting lines, including filling machines from China.	- Workers in the value chain	<p>In-depth IDDs were conducted for critical suppliers from high-risk countries such as China, with the support of third-party experts. In-depth IDDs were also conducted for key suppliers and traders supplying to our site in India.</p> <p>Conducted human rights supplier capacity building and maturity assessments with selected key suppliers (raw materials) to gain a better understanding of their significant human rights risks.</p>	No instances of forced labor, child labor, or significant human rights violations were identified during these assessments.

Table 3: Identified salient risks in our supply chains.

5.4 Particular assessments and remedial measures concerning forced or child labor, slavery and human trafficking

To date, no incidents of forced or child labor, slavery or human trafficking have been identified nor reported in relation to our own operations, supply chains or business relationships. This includes Elopak Canada, Elopak UK, and Elopak USA. Given that no incidents of forced or child labor have been identified, we have not taken measures for remediation.

We consistently assess our suppliers’ performance regarding human and labor rights through EcoVadis or our own SAQ. This allows us to map and identify high risk areas and suppliers regarding human and labor rights and mitigate these more effectively as well as to monitor and follow up performance over time. Re-assessment is done bi-annual or annual depending on assessment results.

By 2024, approximately 95% of our key suppliers¹, 100% of our raw material suppliers as well as 84% of all suppliers (by spend) signed, accepted or demonstrated conformance to our supplier code of conduct. In 2024, 84% of key suppliers (by spend) were assessed and screened via EcoVadis, our internal Supplier Integrity Due Diligence process (self-as-sessment questionnaire and background screening tool) or an in-depth IDD assessment conducted with support from external partners. Suppliers assessed mainly included direct suppliers that provide raw material to our cartons, packag-ing and filling machines, as well as indirect suppliers mainly related to logistics and transport, plant investments, facility services, IT and other critical indirect suppliers.

Elopak continues to conduct assessments, audits and to review risk factors as well as provide training to relevant stakeholders.

6. Going forward

In 2025, we plan to undertake the following actions to further our work to prevent and mitigate risk of adverse impacts on human rights and decent working conditions in our operations, supply chains and business relationships:

Areas	Actions
Policies and due diligence processes	A priority in 2025 is to further improve our risk assessment framework and stakeholder engagement to better account for human and labor rights risks in the supply chain. This includes both internal stakeholder engagement as well as continuing to run human rights capacity building meetings with selected key suppliers. This allows us to raise awareness and to better map, understand and address potential human rights risks.
Remediation	Continue the work on the remediation process where we detect any breaches of human rights, including forced and child labor.
Training and awareness	We will continue our focus on human rights training and awareness. In 2025, Elopak will continue to integrate and train our supply chain teams to follow our responsible supply chain framework. Our sites located in Canada, the USA, Morocco, and India will be targeted specifically.

¹ “Key suppliers” are defined based on their business criticality and spend levels as well as their sustainability risk levels. These are currently direct suppliers providing raw materials to our cartons, closures and secondary packaging, as well as indirect suppliers mainly related to logistics and transport, plant investments including services associated with higher human rights risk such as facility services. Key suppliers exclude equipment suppliers (including spare parts and components). Suppliers related to this business area and categories are treated with similar processes but are not included in targets for key suppliers.

7. Approval

This statement was approved by:

6 May 2025

Board of Directors in Elopak ASA

This document is signed electronically

Dag Mejdell
Chairperson

Manuel Arbiol Pascual
Board Member

Anna Belfrage
Board Member

Sid Mehran Johari
Board Member

Marianne Ødegaard Ribe
Board Member

Håvard Grande Urhamar
Board member
(Employee-elected)

Anette Bauer Ellingsen
Board member
(Employee-elected)

Thomas Körmendi
CEO

26 March 2025

Board of Directors in Elopak UK

This document is signed electronically

Bjarke Ravn-Christensen
Chairperson, Director

Martin Shaw
Board member, Director

Attestation/certificate

In accordance with the requirements of the Fighting Against Forced Labor and Child Labor in Supply Chains Act (Act), and in particular section 11 thereof, I, in the capacity of Executive Vice President Region Americas, attest that I have reviewed the information contained in the report on behalf of the governing bodies of Elopak, Elopak Canada and Elopak USA. 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 within this report. The report was approved in accordance with Section 11 (4)(b)(ii) of the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act².

28 March 2025

“I have the authority to bind Elopak Canada and Elopak USA”

This document is signed electronically

Lionel Ettedgui
Executive Vice President,
Elopak Region Americas

² Cf. Section 11(5) of the Canadian Act