

# Modern slavery act 2015 transparency statement

FY 2023

# 1. Introduction

This statement is made pursuant to the Modern Slavery Act 2015 („MSA“) for the financial year ending 31 December 2023 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 ensure that the business and supply chains of the Greiner companies are free from any forms of modern slavery and human trafficking.

To date, Greiner has established a group-wide Greiner Compliance Management System (CMS), as certified by Austrian Standards (ISO 37301 and ISO 37001) for all entities worldwide, which assists in ensuring that our colleagues and business partners comply with the Greiner Code of Conduct.

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 (FY 2023) to ensure that modern slavery (including human trafficking) is not taking place in the business or supply chain of Greiner.

## 2. Organisational structure and supply chains

### 2.1. Our organisation

Greiner is a family-owned, unlisted stock corporation and one of the world's leading suppliers of plastic and foam solutions. The company is based in Kremsmünster (Austria). Our three operating divisions (Greiner Packaging, NEVEON and Greiner Bio-One) produce and supply innovative solutions for a wide range of industries and sectors under the umbrella of Greiner AG. Most of our customers are in the packaging, furniture and sports, as well as the medical technology and life science sectors. Currently, Greiner offers secure jobs to more than 10,500 people in over 30 countries. In fiscal year 2023, Greiner generated an annual turnover of over EUR 2 billion.

**Greiner AG** is the parent company to 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). The consolidated annual and sustainability report is publicly available on our website [www.greiner.com](http://www.greiner.com).

**Greiner Packaging**, manufactures innovative and sustainable plastic packaging for customers around the world. The division's solutions protect a wide range of products in the food and non-food sectors – from yogurt to detergent. Greiner Packaging has two business units – Packaging and Assistec. The Packaging business unit produces cup packaging and

packaging solutions, while Assistec manufactures custom-made technical plastic parts and complete plastic assemblies. The division has a presence in 30 locations across 20 countries.

**Greiner Bio-One**, develops and manufactures high-quality products for medical and laboratory applications, with a focus on single use plastic products for in-vitro diagnostics, biotechnology and diagnostic and pharmaceutical industries. The company serves as a technology partner for hospitals, laboratories, universities, research institutions and customers in the diagnostic, pharmaceutical and biotech fields. Greiner Bio-One consists of three business units – Preanalytics, BioScience and Mediscan – and has 29 locations in 22 countries.

**NEVEON**, is a leading expert in foam solutions for polyurethane soft and composite foams for a wide range of applications. The division has operations in 55 locations spread over 14 countries and brings together all of the company's foam competencies in its three business units: Living & Care (mattresses, padded furniture and medical applications), Mobility (automotive, aviation, railway and maritime) and Specialties (boiler insulation, acoustic solutions, filter foams, sport applications, specialized packaging and special applications).

### 2.2. Our supply chains

For us, responsibility starts outside the company gates. We have built up a network of high-performance suppliers over decades – in Europe and around the world. We have defined rigorous guidelines, so that our partners are aware of the high expectations we have when it comes to our products and our collaboration. We regularly discuss the standards we expect from our suppliers in our everyday business and ensure that the supply chain meets sustainable manufacturing criteria from the beginning.

Greiner operates more than 110 sites (including manufacturing sites) in over 30 countries, some of which are considered to present a high-risk in terms of the likelihood of engaging workers in modern slavery and human trafficking. As a globally acting company, we procure goods, components, raw materials, and services and have agents, distributors, and joint ventures around the globe. Therefore it is inevitable that some of these business activities also take place in high-risk countries.

In the FY 2023 the high-risk countries Greiner was active in were: Bahrain, Bosnia and Herzegovina, Brazil, Bulgaria, China, India, Kosovo, Mexico, Moldova, North Macedonia, Romania, Russia, Serbia, Sierra Leone, South Africa, Syria, Thailand, Turkey and Ukraine. We are aware of the problems associated with this and do have several activities in place (such as external supplier assessment via EcoVadis).

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 and human trafficking, 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 not willing to improve.

### 3. Governance

The guidelines and expectations for our employees and business partners are clearly defined in Greiner's Code of Conduct as well as the Code of Conduct for Suppliers and Business Partners, which outline our expectations for them to act in a lawful, integrity-based and sustainable manner. We believe that our commitment to good corporate governance is reflected in our corporate culture, which incorporates a focus on integrity to strengthen the trust that the stakeholders have in our company. We want to be recognised as a responsible partner and industry role model. In order to achieve this, we relentlessly implement and apply our standards and values in our daily business, both internally and externally.

Our sustainability management and forward-looking approach to risk management are also essential to achieving and maintaining a long-term and sustainable increase in our value as a company.

#### 3.1. Clear values & principles

At Greiner, we live by clearly defined values. These values must meet the highest moral and ethical standards because they affect how we work on the inside and on the outside. Our values shape us as a company and provide every individual with a firm foundation and framework to work together. Our values have a significant impact on our culture and set us apart as a company.

#### Freedom of association, dialogue and employee participation

Dialogue and employee participation are important tools that strengthen employee loyalty in the long run. They are also effective in helping us to meet the needs of stakeholders. In our company, we make sure that information is exchanged about a variety of topics and at various levels. The formats that we regularly communicate include employee appraisals, employee surveys, regional committees, and cooperating in voluntary initiatives and interest groups. In addition, we comply with all regulatory requirements that serve to represent employees' interests and give them their say, such as the possibility to elect work councils or the right to freedom of assembly and association. In many companies of the Greiner Group, the interests of the employees are represented by a works council or a company union, which operate in accordance with national laws and regulations.

#### Fair pay and collective bargaining agreements

As a family-owned company steeped in tradition, Greiner supports remuneration for all employees that is in line with the market. The wages paid are based on the standard market remuneration for a comparable position in the relevant field. This includes the application of collective bargaining agreements: In 2023, 55 percent of our employees worldwide were covered by a general and/or collective bargaining agreement (2022: 54 percent). In addition, there are variable compensation components that relate to individually agreed targets.

**Greiner has four binding values for all employees that guide everything we do: openness, appreciation, reliability and striving for excellence**

#### Greiner's values and principles

 **Openness**

 **Striving for excellence**

 **Reliability**

 **Appreciation**

The principles of bonus compensation are regulated at divisional or site level and apply to employees above a certain grade. For employees who are not covered by this regulation, local bonus regulations and incentive systems apply, which vary according to country, field of work, and position.

### 3.2. Our commitment

#### Member of the UN Global Compact Network and UNGC

As a company, we have been contributing to sustainable development for more than 150 years through our commitment to transparent and ethical behaviour. To pin down this commitment and make it transparent, we joined the UN Global Compact (UNGC) in 2020, the world's largest and most significant initiative for responsible corporate governance. As a signatory to the UN Global Compact, we are committed to its ten principles related to human rights, labour standards, environmental protection and anti-corruption. All the principles are based on key United Nations (UN) conventions and all signatory companies are expected to implement the ten principles within their sphere of influence. Our Annual and Sustainability Report 2023, which is publicly available at [greiner.com](https://www.greiner.com), serves as a Communication on Progress for 2023 (CoP) on our implementation of the Global Compact's principles and provides an overview of where we currently stand.

#### Contributing to the Sustainable Development Goals (SDGs)

The 17 Sustainable Development Goals (SDGs) and their 169 sub-goals guide the efforts and shape the responsibilities of governments, businesses, cities and civil societies worldwide. They were adopted by the 193 member states of the United Nations (UN) in September 2015 and define the economic, social and environmental dimensions of sustainable development. At Greiner, we support the implementation of the SDGs and want our business activities to make a significant contribution to achieving the goals. Our material analysis assessed our contribution to the SDGs across the entire value chain. The analysis revealed that we make a particularly relevant contribution to four goals: SDGs 3, 5, 8, 12 and 13.

### 3.3. Corporate due diligence

Compliance with social standards and human rights is a top priority for us and is anchored through a range of measures. In cooperation with our suppliers and business partners, we commit to make sure that our actions set are in accordance with the UN Guiding Principles on Business and Human Rights and the Core Labour Standards as set out by the International Labour Organization (ILO), and in strict compliance with local laws.

Our company is opposed to child and forced labour without exceptions. Greiner supports fair pay, as well as freedom of assembly and expression. Discrimination, harassment, and breaches of our company policies are not tolerated. In order to comply with these principles, we rely on education, regular training, and offer a whistleblowing platform. Our measures also include applying corporate due diligence according to the OECD Due Diligence Guidance for Responsible Business Conduct.

### 3.4. Whistleblowing platform

Greiner integrated a whistleblowing platform, [tell-greiner.com](https://tell-greiner.com), accessible via the internet, which enables our employees, business partners, customers and other stakeholders to report incidents such as discrimination, human rights violations but also other forms of non-compliance and misconduct. The whistleblowing platform is open to all employees but also external stakeholders and reports can be submitted identified or anonymously.

In the Whistleblowing Policy, stakeholders can find all they need to know about the reporting system, such as what can be reported and how the information is dealt with. Further it states how anonymity, confidentiality and protection of whistleblowers is ensured. Click [here](#) to access the whistleblowing platform.



## The OECD Due Diligence Guidance consists of the following six steps:

### Communication and reporting

Creation of transparency with regard to the measures taken and their impact through various forms and channels of communication (annual Modern Slavery Act Statement, publication of a sustainability report, progress report with regard to the UNGC, internal and external communication measures on various topics, specialist events and internal exchange, etc.).

## 2

### Identification and assessment of potentially negative impacts

Surveying and assessing possible risks and potential adverse impacts along the value chain (risk management, whistleblowing platform, risk analysis of suppliers, etc.).

## 6

### Take responsibility

If adverse impacts cannot be prevented, it is important to participate in targeted remedial measures in a timely manner (cooperation with appropriate organizations to address the target group as well as the issue, etc.).

## 5

## 1

### Embedding and public obligation

Definition and embedding of the relevant principles and guidelines in company policy (for example, Code of Conduct, Code of Conduct for Suppliers and Business Partners, various policies, annual Modern Slavery Act Statement, confirmation of compliance with the UNGC Principles, signing of the Diversity Charter, participation in the UN WFP, etc.) and the implementation and certification of relevant management systems.

## 4

### Monitoring

Regular review of the effectiveness of measures and procedures in order to minimize potential adverse impacts (assessment by EcoVadis, conducting of audits (SEDEX, ISO), development of clear targets and corresponding KPIs, etc.).

## 3

### Prevention and mitigation

Counteracting and mitigating potential risks and impacts by implementing appropriate measures that address the respective topic area as well as the groups affected (education and awareness, training, employee discussions, etc.).

## 4. Our policies

### 4.1. Code of Conduct & Code of Conduct for Suppliers and Business partners

As part of Greiner's commitment to ensure that our business and supply chain are free of modern slavery and human trafficking, we have implemented the Greiner Code of Conduct and Greiner Code of Conduct for Suppliers and Business Partners. Everyone who works for and in cooperation with Greiner is obliged to sign a declaration, confirming that they will comply with the Greiner Code of Conduct.

The overall responsibility for the Code of Conduct lies in the function of the Greiner Group Compliance Officer of Greiner AG.

Implementation and management of day-to-day operations of the policies related to the Code of Conduct are carried out by the Greiner Group Compliance Officer of Greiner AG, the Division Compliance Officers of Greiner Packaging, NEVEON and Greiner Bio-One as well as the Local Compliance Officers of each Greiner location.

Our first-tier suppliers are required to:

- accept contractual obligations to comply with 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 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 equivalent set of principles.

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

Greiner strives to embed respect for human rights and taking a zero-tolerance approach to modern slavery, by requiring all employees to sign Greiner Code of Conduct. Compliance relevant colleagues are also required to complete three specific e-learning regarding compliance (Compliance Basics, Antitrust and Anti-Corruption).

## 4.2. Compliance policies

Based on the principles of the Code of Conduct, we have also introduced various Greiner Compliance Policies. Not only do we want to demonstrate our commitment to operating within the boundaries of the law, but also to promote ethical behaviour and to contribute to building and maintaining trust among our stakeholders.

The Greiner Compliance Policies help navigate the complexities of different legal systems, cultural norms, and business practices across various jurisdictions.

These Compliance Policies are in force and apply to all Greiner employees:

- Anti-Corruption Policy
- Antitrust Law Policy
- Business Partner Policy
- Data Privacy Policy
- Diversity, Equity & Inclusion (DEI) Policy
- Key Positions Policy
- Legal Policy
- Military & Dual Usage Policy
- M & A Competition Law Policy
- M & A Practice Guide
- Policy on Measures to Take in the Event of Violations
- Sustainable Sourcing Policy (SSP)
- Whistleblowing Policy

## 4.3. Sustainable Sourcing Policy

Along with Greiner Code of Conducts, the group-wide Sustainable Sourcing Policy was revised in 2022 and rolled out in 2023. Among numerous, the main objectives of the Sourcing Policy are to ensure that all suppliers employ sustainable business practices and that all our employees apply sustainability principles when purchasing goods and services. The policy brings together social, ethical, environmental, and economic aspects; it lists minimum requirements towards suppliers; and presents escalation process in case of non-compliance.

## 5. Training

Especially in a company operating around the globe, uniform training with uniform content is an essential tool to maintain compliance within the organization. These trainings are arranged centrally, across all organizational locations.

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 complying with the Greiner Code of Conduct, all of the Greiner Policies and other applicable laws and regulations. They are obligated to undertake mandatory training on these principles. These training courses are repeated regularly. For specific e-Learning trainings (3 modules, Compliance Basics, Antitrust and Anti-Corruption), the colleagues are also required to undertake a test after the training, achieving a score of 80% or higher. In total, the quota of trained employees of the group, each division and each company has to be above 90% at all times. Our training quota is constantly reviewed by the Compliance Officers and discussed at least biannually by our Compliance Board.

To raise internal awareness and to build up competence on sustainable sourcing practices, a Sustainable Sourcing Training was launched in 2023. We focused on training relevant employees to deepen their skills in purchasing departments and to increase awareness and knowledge of sustainable sourcing at all levels. For this purpose, we developed six modules as an online training course and rolled them out across the Group.

## 6. Risk monitoring & compliance

As a global provider of plastics and foam solutions for various industries, we are exposed to a variety of financial, operational, and strategic risks that need to be managed. Our governance objectives are to minimize negative social, environmental and economic impacts and manage the according risks and opportunities.

To evidence our commitment, we had all Greiner companies ISO 19600 and ONR 192050 certified in 2020. ISO 19600 is an international standard that establishes requirements for the implementation of compliance management systems. In 2021, the underlying standard was changed to ISO 37301. This change resulted in additional improvements to our compliance management system, which allows us to detect, understand and proactively minimize the risks of non-compliant behaviour and respond appropriately to any violations. In 2023 we also got certified under ISO 37001.

Responsibilities, internal processes and regular risk analyses are described in a comprehensive compliance manual. The compliance risk analysis, first performed in 2016, is reviewed on a regular basis and revised as necessary. Any potential changes to how risks are prioritized are taken into account when making adjustments to the compliance management system.

Each Greiner company has a Local Compliance Officer, each division has a Division Compliance Officer, and the company as a whole has a Group Compliance Officer. Regular trainings are provided to employees in compliance-related roles. An introduction to compliance is an integral part of the onboarding process for new compliance-relevant hires. The Supervisory Board is informed about the Compliance Management System by the Group Compliance Officer in regular reports, including biannual CMS reports, annual certification reports, and ongoing updates from internal audit and risk management teams.

We use trainings, other tools and processes to ensure that we comply with all statutory and internal regulations. To achieve this, we implemented a risk management system in line with the precautionary principle in 2016. This system records, analyses and evaluates relevant risks at regular intervals. In 2023, risk management was broadened in scope to incorporate material ESG risks. We consider all relevant activities and developments across our entire value chain, from the supply chain through to production, waste disposal and recycling. To achieve this, Greiner uses an internationally recognized four-step risk management process.

### Four-step risk management process:

#### 1 Risk identification

Risks from the Greiner Risk Universe are identified periodically on the basis of dialogue between management and various experts. This consists of nine overarching risk categories and 38 detailed risk areas, encompassing strategy, market development, operating activities, employee relations and sustainability (ESG). This holistic approach ensures that our assessments incorporate the potential damage from environmental risks, natural disasters and reputation risks.

#### 2 Risk assessment

In the second step, identified risks are assessed in terms of their potential impact and probability of occurrence and included in the Greiner risk matrix. This assessment is performed using uniform group-wide criteria that incorporates both financial indicators and possible non-monetary damages.

#### 3 Risk management

The Greiner risk matrix defines the situations in which measures are required to minimize risk. In collaboration with the risk manager and experts, we define and document these measures, as well as implementation schedules and responsibilities in risk management software.

#### 4 Risk monitoring

Greiner prepares reports on the basis of risks that have been identified and assessed and the measures that have been defined. Top risks are defined together with management on an annual basis. Possible risks are evaluated on a regular basis along with risk minimization measures.

## Risk management

As part of our initiative to identify and address risks of modern slavery and human trafficking in our own operations and our supply chains, most Greiner entities:

- Operate on the Greiner Compliance Management System, as certified by Austrian Standards according to ISO 37301 (Fair Business Compliance Certificate) and ISO 37001 (Anti-bribery management systems) which assists in ensuring that our colleagues, business partners and customers comply with the Greiner Code of Conduct, internal policies and other laws and regulations;
- Have a membership with a collaborative platform (currently EcoVadis) providing sustainability ratings for suppliers. The objective of the Corporate Social Responsibility (CSR) rating methodology is to assess the quality, but also the maturity of the CSR management systems.
- Carry out audits on first-tier suppliers, as appropriate and as decided by the purchasing organization;
- Cooperate with independent experts to carry out investigations on our suppliers, where appropriate.
- 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 comply with 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;
- Encourage openness and support. Anyone can raise genuine concern in good faith under our [tell-greiner.com](https://www.greiner.com/tell-greiner) whistleblowing platform. 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 operations or in our supply chains;

## 7. Next steps

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

- Focus on supplier assessments in all Greiner divisions to ensure proper risk mapping and evaluation. Set supplier performance improvement KPIs if needed to track progress. Collaborate with suppliers on their corrective action plan
- Draft and roll-out of a group-wide Human Rights and People Policy Conception and implementation of a group-wide training on Human Rights and Modern Slavery
- Develop and roll-out of a group-wide training program on diversity, equity & inclusion (DEI)
- Revise and roll-out the group-wide Code of Conduct
- Increase the number of trained employees on Sustainable Sourcing



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