



# Report on child labor due diligence in the supply chain

This report of SIG Group AG ("SIG" or the "Company") relates to the due diligence and reporting obligations covering child labor required by Art. 964j-k of the Swiss Code of Obligations and the Swiss Ordinance on Due Diligence and Transparency in Relation to Minerals and Metals from Conflict-Affected Areas and Child Labour. It covers the period January 1, 2023, to December 31, 2023. During the reported period, SIG Group AG, Neuhausen, Switzerland, complied with the due diligence obligations regarding child labor, as further detailed below.

## About SIG

SIG is a leading provider of sustainable, innovative, and versatile packaging solutions. We work in partnership with our customers to bring food products to consumers around the world in a safe, sustainable, and affordable way. We are the only system supplier covering carton, pouch, and bag-in-box. Our versatile technology and product innovation capacity enable us to provide our customers with solutions across categories and channels, addressing consumer and market needs with flexibility and speed. Founded 1853, SIG is headquartered in Neuhausen, Switzerland. The skills and experience of our approximately 9,000 employees worldwide enable us to respond quickly and effectively to the needs of our customers in over 100 countries.

## Our commitment to respecting human rights

We are committed to respecting human rights in our operations, supply chain, and with respect to our major business relationships. In doing so, we can contribute to global respect for human rights and support our ambition to have a scalable, systemic net positive impact on society, as well as meeting growing regulatory demand for human rights due diligence. Our approach is guided by the United Nations Guiding Principles on Business and Human Rights, and the relevant Organization for Economic Co-operation and Development (OECD) frameworks. Also, SIG is a signatory to the United Nations Global Compact. We are committed to adhering to the standards encompassed by the International Bill of Human Rights, the International Labor Organization's (ILO) core labor standards, and the Ethical Trading Initiative (ETI) Base Code.

## Governance

In 2023 we established a steering committee to oversee implementation of our human rights due diligence roadmap. Members include our Chief People and Culture Officer (a member of our Group Executive Board in 2023 with designated responsibility for human rights) and senior leaders from relevant business functions. Our human rights taskforce, including functions such as Legal & Compliance, Procurement, People & Culture and Corporate Responsibility, undertook extensive activities this year to strengthen our human rights due diligence. For more information, see our [Annual Report](#).

## Our policies on child labor

Ethics and Compliance are key factors to achieving our business goals and securing SIG's long-term business success.

[SIG's Code of Conduct](#) (CoC), publicly available on our website, commits us to act in accordance with nationally and internationally recognized human rights. As stated in the CoC, SIG does not tolerate, engage in or support child and forced labor, including prison labor, slavery and any other form of labor that poses a threat to both adults and children. SIG is committed to prevent, mitigate and address the risks of child and forced labor in its global value chains.<sup>1</sup> All of our employees are regularly trained on the Code of Conduct. Our commitment to promoting fair labor practices and upholding labor rights for our employees, is embedded in our [Human Rights, Labor and Community Engagement Policy](#), including the prevention of child labor. This

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<sup>1</sup> SIG Code of Conduct, Human Rights Compliance (section 4), available at <https://www.sig.biz/en/investors/governance/code-of-conduct>



policy was last updated in 2023 and is publicly available on our website. Our approach to human rights due diligence is described in section 5.1.4.

We expect our suppliers to respect all human rights including child labor. Our [Supplier Code of Conduct](#), updated in 2022 and publicly available on our website, forms an integral part of any agreements between SIG and its suppliers and sets out our expectations. Our suppliers are provided with up-to-date information in relation to any changes to our Supplier Code of Conduct. In regard to child labor it explicitly states: Suppliers shall neither use nor tolerate child labor. They shall observe the relevant ILO standards, United Nations Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises. Young persons under 18 shall not be employed at night, in hazardous conditions or work overtime.<sup>2</sup> In addition, SIG expects suppliers to communicate and apply the principles set out in the Supplier Code of Conduct throughout their supply chain. Significant suppliers must formally acknowledge the Supplier Code of Conduct.

Should indications of child labor be alleged or found, we strive to address and resolve them within our own operations and aim to prevent or mitigate them in our supply chain. We engage with our suppliers to help them improve through corrective action plans. If a supplier fails to respond to our requests or shows no willingness to improve, we reserve the right to terminate our business relationship with them in accordance with our contracts. Any remedial actions should be consistent with ILO standards and the latest best practice guidance.

## Our own operations risk management system

Understanding and managing risks starts at our own operation. We are an active member of SEDEX, one of the world's leading ethical trade membership organizations that provides independent verification against human rights, labor, health & safety, environmental, and business ethics standards. We conduct SEDEX SMETA audits at our production sites every two years, which include an assessment of potential child labor and human rights risks and impacts.

If the audit findings identify any issues, corrective action plans help us to remediate these and establish mechanisms to prevent similar issues in the future. Following on from a human rights risk assessment of our operations as a whole in 2022, 27 of our production sites<sup>3</sup> completed SEDEX SMETA audits in our 2023 two-yearly cycle. Our office sites in Australia and Mexico, and several SIG legal entities in Germany and Switzerland, also completed SMETA audits.

## Our supply chain risk management

SIG expects suppliers to meet our responsibility requirements to help mitigate social and environmental risks in our supply chain. Our Supplier Code of Conduct sets out our expectations on topics such as labor (including no tolerance for child labor), health and safety, and environmental protection. A risk assessment is performed to identify which product categories are defined as high-risk product categories in our supply chain. This risk assessment covers human rights (including child labor), labor practices, health and safety, resource efficiency, energy use and greenhouse gas emissions, and pollution. The assessment also covers the supplier's potential to affect our ability to meet our customer demands and the volumes we purchase from them, and eventually results in a list of 'significant suppliers'.

For the (production) sites of those significant suppliers, we carried out a human rights risk analysis. This involved mapping suppliers against country and product risk data. We use a number of indices including multiple indices for child labor to assess the risk of child labor and other human rights.

For the suppliers identified as having an increased risk of using child labor, we conducted a more in-depth assessment using available information from sources such as EcoVadis assessments and SEDEX SMETA audits, which both include aspects on child labor. In addition, we conducted a media screening using a web-crawling tool for a sub-set of these suppliers based on their significance to SIG. The tool searches the internet for insights on key ESG risks in the supply chain and controversies in the media including any evidence of child labor.

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<sup>2</sup> SIG Supplier Code of Conduct, section "No child labor", p. 2, available at <https://cms.sig.biz/media/zonhu2qr/sig-supplier-code-of-conduct.pdf>

<sup>3</sup> Includes one audit within the 2023 cycle that was completed in early January 2024. Excludes our production plant in Voronezh, Russia, due to limitations in respect of data access and our production plant in Baie-d'Urfé, Canada, as it was closed in 2023.



To date, we have not identified any case of suspected child labor in our supply chain. Based on our human rights risk analysis, we conclude that the risk of child labor in our tier 1 supply chain is low. For information for risk management measures undertaken on other supply chain sustainability risks, see our [Annual Report](#).

SIG conducts in-depth assessments through requiring self-assessments, external assessments or SEDEX and EcoVadis assessments. Our assessments SEDEX and EcoVadis both include aspects on child labor.

Should gaps or any indications of child labor be identified, our procurement teams follow-up with the suppliers directly to resolve and monitor any issues. Responsible sourcing for us entails that we must educate our procurement teams. To do so we use our Responsible Sourcing Directives, and accompanying training, providing buyers with detailed guidance to support implementation of our responsible sourcing approach, which also supports human rights due diligence in our supply chain.

## Supply chain traceability system

Names and addresses of all our Tier 1 suppliers, as well as the product category of the goods or services they provide, are recorded systematically on our procurement systems. We keep records of our monitoring activities, assessments, and completed EcoVadis assessments and SEDEX audits.

## Reporting mechanism

Issues or concerns, including those related to human rights and child labor, may be reported through any available channel, including supervisors and managers, representatives of People & Culture, Legal & Compliance, Internal Audit or the [SIG Integrity & Compliance Hotline](#). Our grievance mechanism is communicated also to employees through the Code of Conduct, our Code of Conduct trainings and with posters on site advertising our Integrity & Compliance Hotline.

In addition, there is a separate subsection in our Compliance site within SIGs employee application about our Integrity & Compliance Hotline. Employees can access basic information in local language and be informed about local phone numbers and the link to the web-based grievance.

Reported issues received through these channels are subsequently investigated. Each case is proceeded with a systematic approach to address and resolve the reported concerns and is concluded by a subsequent analysis and evaluation of potential root causes. We seek to find solutions in an individual process tailored to the grievance reported and, as deemed appropriate, together with the affected person.

The Compliance team responsible for the Integrity and Compliance Hotline provides quarterly updates on cases to the Audit & Risk Committee.

In 2023, we updated our grievance procedure and launched a new case management tool. The new tool makes it easier for both employees and external parties to raise concerns. It will also make case management and reporting more efficient and increase oversight of grievances.

During 2023, we did not receive a concern about child labor in our own operations or our supply chain.

## Continuous improvement and additional information

Putting our policies into practice means working continuously to identify human rights impacts, including child labor related ones, mitigating and addressing them, continuously monitoring the effectiveness of our measures and periodically reporting on our performance. We seek continuous improvement and regularly review the way we respond in a constantly changing operating environment. One way to do so is our continuous engagement in the [Aim Progress Initiative](#), a forum of leading fast-moving consumer goods manufacturers and common suppliers to promote responsible sourcing practices and sustainable supply chains. We use its established methodology to assess, and identify opportunities to strengthen, human rights due diligence related to our supply chain.

For more information, we encourage you to also consult our latest [Annual Report](#) and our [website](#).