

**Flint Group Packaging Solutions
Modern Slavery and Human Trafficking Statement
for the financial year ending 31 December 2024**

Our commitment

Flint Group is committed to ethical business practices, guided by the Senior Manager for Integrity & Compliance, the Flint Group Risk, Integrity & Compliance Committee, and the General Counsel. Modern slavery and human trafficking are key priorities across our business and in so far as is practical our supply chains.

We are a participant of UN Global Compact and support the Ten Principles of the UN Global Compact, including those related to human rights, labour, environment and anti-corruption. We operate a zero-tolerance approach to modern slavery and human trafficking in any form, including forced and child labour.

Our organisation

Flint Group is dedicated to serving the needs of the global Flexible Packaging, Paper & Board, Narrow Web, and Publication industries, both conventional and digitally printed.

The company develops, manufactures, and markets an extensive portfolio of printing consumables and equipment, including: a vast range of conventional and energy curable inks, coatings and additives for Flexographic, Gravure & Offset applications; pressroom chemicals; and printing blankets. Furthermore, Flint Group designs and manufactures digital printing presses for labels, corrugated packaging, document, and commercial applications.

The company is a leader in colour management solutions which are supported by a Global Colour Centre to ensure colour consistency and standardisation.

Flint Group strives to support its customers via a global team and through a relentless focus on developing innovative products, delivering exceptional levels of service, and ensuring security of supply.

Flint Group has a global reach, operating sites in North and Latin America, Europe, the Middle East, Africa, and Asia-Pacific, and sells its products to customers in more than 120 countries.

The company's main customers are printers, converters, food and beverage packaging companies, and retailers.

On a worldwide basis, the company is the number one or number two supplier in every major market segment it serves.

Headquartered in Jersey, Flint Group employs some 5,000 people worldwide in 76 manufacturing facilities across 32 countries. Revenues for 2024 were €1.5 billion.

The holding company, Flint Group Midco Ltd, is a private limited liability company located in Jersey.

Our policies

The protection of human rights is a core element of our corporate responsibility. We strictly prohibit child labour, forced labour, and human trafficking in all forms, and strengthen the freedom of association – within our own operations and across our value chains.

We are committed to respecting internationally recognised human rights in our business operations and value chains. We are guided by internationally recognised frameworks, including:

- The United Nations Universal Declaration of Human Rights
- The United Nations Global Compact (UNGC)
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- The United Nations Guiding Principles on Business and Human Rights

We take steps to minimise the possibility of Flint Group becoming involved in compliance violations, including but not restricted to modern slavery & human trafficking, by ensuring we have effective policies, processes and procedures in place. We therefore integrate human rights principles through a robust policy and governance framework across our operations and supply chain:

- **Code of Conduct*** outlines the behaviour expected from our employees and our contractors
- **Supplier Code of Conduct*** defines the conduct we expect from our suppliers
- **Human Rights Policy*** promotes respect for internationally recognised human rights throughout our operations and value chains
- **Human Rights Statement*** reaffirms our commitment to human rights and our opposition to child labour, forced labour, and exploitative practices
- **Modern Slavery & Human Trafficking Statement*** underscores our dedication to ethical business practices
- **Speak-Up Policy*** encourages an open and transparent work environment where concerns can be raised safely without fear of retaliation

- **Global Retaliation Policy*** provides protection for individuals who report unethical behaviour
- **HSE Policies** ensures safe, healthy, and fair working conditions across all Flint Group sites
- Integration of the **human rights considerations** into stakeholder assessment (TPI, suppliers)

All policies are accessible via the Flint Group intranet and are reviewed regularly. Updates are communicated to employees via email. An anonymised version of the policies marked with an asterisk (*) is also available to Flint Group stakeholders on our website.

Communication campaigns and training programmes in multiple languages ensure employees are aware of updates and understand their importance.

Qualitative and quantitative objectives, as well as control activities, have been defined for each Integrity & Compliance policy. They are reviewed annually to assess their effectiveness. Corrective measures are taken when potential gaps have been identified.

Due diligence

The **global regulatory landscape** around human rights and corporate accountability is rapidly evolving. Governments are introducing stricter legislation that compels companies to assess and address human rights risks within their operations and supply chains. These developments reinforce the growing expectation for companies to conduct meaningful due diligence and integrate human rights into governance frameworks.

Due diligence within our operations

At Flint Group, we take a proactive approach to due diligence across our own operations.

We take particular care to ensure that our **recruitment and retention practices** are free and fair. Flint Group does not charge any worker placement, service, or residency fees, nor do we permit employee loans. We verify the identity and legal right to work of all employees and clearly communicate their employment rights and obligations. All workers are free to resign in accordance with their notice period, and where agency workers are used, we engage only reputable agencies.

Our annual **Employee Representation Certificate (ERC) programme**, in place since 2009, allows employees to confirm awareness of compliance topics and raise concerns confidentially. In 2024, over 1,600 employees participated, raising 88 issues that were reviewed and addressed.

Internal audits further strengthen our due diligence efforts. In 2024, our independent audit team conducted 35 site and functional audits, resulting in over 300 corrective actions. Investigations and follow-up actions are tracked and reported to senior leadership, including the General Counsel and Executive Committee, to ensure transparency and timely resolution.

Our **Integrity Assurance Hotline** [\[link\]](#), available 24/7 and in multiple languages, is another key channel for employees and third parties to report concerns anonymously and without fear of retaliation. Investigations are conducted independently by our Internal Audit function and reported to senior leadership, ensuring transparency and accountability.

Due diligence within our supply chain

Flint Group condemns all forms of forced or compulsory labour. We strictly prohibit and do not engage in forced labour, child labour, or human trafficking. We expect our business partners, particularly our suppliers, to uphold the same standards and to implement appropriate human rights policies.

Within our supply chain, we take a proactive role in promoting business ethics, including awareness of modern slavery and human trafficking. All top **suppliers** are required to sign the Flint Group Supplier Code of Conduct. Our procurement contracts and general terms and conditions of purchase emphasise the importance of high ethical standards, including the explicit rejection of forced and child labour. We reserve the right to cease trading with suppliers who do not share these values. New suppliers undergo environmental and social impact assessments, and key suppliers are audited to ensure compliance.

Third-party intermediaries (TPIs) must complete a due diligence check before being approved as Flint Group partners. They are required to follow our Code of Conduct, complete a compliance due diligence and risk assessment during onboarding, and agree to contractual compliance clauses. This process ensures a clear commitment to respecting human rights, and regular reassessments help maintain ongoing compliance.

Business partners who fail to meet our compliance standards may face contract termination.

Any business partner employee can report human rights concerns through the Flint Group Integrity Assurance Hotline, which is available 24/7 and allows for anonymous reporting without fear of retaliation or reprisal.

Risk Assessment and Management

Flint Group is committed to advancing human rights practices by prioritising people-related risks through robust due diligence and collaboration across our value chain, in alignment with UN guidelines and applicable legal standards.

Participation in the UN Business & Human Rights Accelerator programme enabled us to identify areas for improving our approach to managing human rights issues.

As part of this initiative, we conducted a comprehensive risk assessment, supported by a dedicated working group and workshop, to identify and prioritise key human rights risks.

We have identified the following salient human rights risks within our operations and supply chain:

- Child labour and forced labour
- Health and safety
- Discrimination
- Pollution

To mitigate these risks and track our progress, Flint Group has already implemented several **key measures within our workforce**:

- **Child and forced labour:** We confirm the age of all employees to ensure legal working age, and we maintain zero incidents of child or forced labour within our workforce.
- **Health and safety:** We uphold Flint Group's health and safety policies globally and monitor effectiveness through year-on-year reductions in our Total Incident Rate (TIR).
- **Discrimination:** We address workplace discrimination by tracking reported cases, publishing data on pay equity, and monitoring the percentage of leadership roles held by women.
- **Human rights awareness:** We continue to improve the completion rate of our human rights training to raise awareness of human rights and modern slavery risks across our workforce.

Flint Group **addresses salient human rights risks in our supply chain** by requiring suppliers to adopt our Supplier Code of Conduct and complete regular sustainability questionnaires. We assess their practices through documentation reviews, feedback, and by discussing **labour, health and safety, and environmental matters** during meetings and audits.

Effectiveness of Measures

Flint Group has implemented several key indicators to measure the progress and effectiveness of actions taken to address salient human rights issues within our operations.

Key indicators addressing human rights salient issues within our organisation

Minimum hiring age [addressing Child labour]

Flint Group abides by the UN Convention on the Rights of the Child and recognises the rights of every child to be protected from economic exploitation. We comply with the minimum hiring age in every country where we operate. In 2024 all employees working for Flint Group were **above the minimum hiring age** in every country where we operate.

Cases reported to Flint Group Assurance Hotline [addressing Child labour, forced labour, and discrimination]

In 2024, Flint Group received 43 complaints via the Flint Assurance Hotline, of which **8 complaints related to discrimination or harassment**.

All 8 cases were reviewed and investigated during the reporting period. Where necessary, remediation plans were implemented in line with applicable legal and internal standards. In substantiated cases, appropriate corrective measures were taken on a case-by-case basis, ensuring compliance with company policies and regulatory requirements.

None of the reported cases referred violations of the rights of Indigenous peoples, child labour, forced labour or compulsory labour.

Total Incident Rate [addressing Health and safety]

Our objective is to reduce our Total Incident Rate (TIR) by 10% each year. In 2024, we continued this positive trend, lowering the number of reportable incidents at Flint Group sites to 15, resulting in a TIR of 0.30. This represents a reduction of 26.8% compared to 2023 TIR of 0.41.

Women in management positions [addressing Discrimination]

We think diversity is an opportunity and a key contributor to our success. People with different backgrounds and experiences enrich our company culture and enlarge our business vision. This is the reason why we are committed to ensure broader cultural representation in our management teams. In 2024, 22% of senior management employees were women.

Key indicators addressing human rights salient issues within our supply chain

Alignment with our Code of Conduct / Supplier Code of Conduct [addressing Child labour, forced labour, health and safety, discrimination and pollution]

Flint Group's key business partners, especially our distributors and suppliers, must adhere to the values and principles disclosed in our Code of Conduct and/or our Supplier Code of Conduct.

In 2024, 93% of our top suppliers were adhering to Flint Group Supplier Code of Conduct.

In 2024, 86% of our Third Party Intermediaries were adhering to Flint Group Code of Conduct.

Understanding and Preventing Modern Slavery and Human Trafficking

Internal employee training

All Flint Group employees must complete mandatory **Code of Conduct training** and adhere to our **Core Values** (ACTS: Accountable, Collaborative, Trustworthy, Sustainable).

Flint Group's Code of Conduct and supporting policies ensure high standards of ethical and compliant business operations.

Training programmes are available in up to 15 languages via the web-based platform Litmos. They are supplemented by internal communication initiatives, such as:

- Annual Code of Conduct refresher courses
- Internal communication on topics such as a speak-up culture, anti-corruption and bribery, human rights, sustainability, and travel and expenses
- Specific training on anti-corruption, conflict of interest, data privacy and security, harassment & discrimination, human trafficking, antitrust, trade controls, and business ethics

Our employees receive **yearly training on human rights**. This training underscores the importance of complying with local employment laws, respecting human rights, and maintaining zero tolerance for any form of forced or child labour.

In 2024 we allocated several Integrity & Compliance (I&C) courses to our employees:

- 82% of the I&C courses allocated to Flint Group employees were completed
- 76% of the human rights training courses allocated to Flint Group employees were completed

External employee training

In 2024, Flint Group participated in the **UN Global Compact Business & Human Rights Accelerator programme**. The Business & Human Rights (BHR) Accelerator is a six-month programme designed to support our overarching objective of moving the global business community from policy to action in respecting and supporting human rights. This is achieved by enacting an ongoing human rights due diligence process and setting concrete targets to address salient human rights risks.

The main objective of the programme is to help companies transition from commitment to action on human and labour rights by implementing a robust human rights due diligence process.

As part of this programme, we conducted a human rights gap assessment and identified areas for improvement in managing human rights issues. Additionally, we carried out a thorough risk assessment to identify our salient human rights issues.

As an outcome of this programme, we have identified specific actions that we will implement within our organisation and across our supply chain throughout 2025.

The same year, Flint Group also participated in the **UN Gender Equality Accelerator programme**.

In September 2024, Flint Group Thailand participated in the **AIM-Progress Capability Programme on Human Rights Due Diligence (HRDD)**. The programme will conclude in March 2025, and follow-up actions will be implemented as part of its outcomes.

Increase business partner awareness

Flint Group condemns forced or compulsory labour. We strictly prohibit and do not engage in any forced or child labour or human trafficking. We also expect our business partners, particularly suppliers, to have human rights policies.

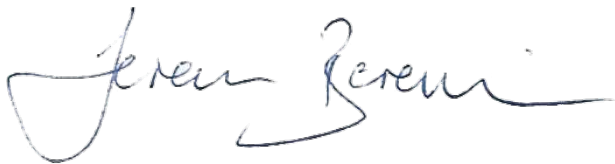
Our suppliers are asked to sign up to the Flint Group Supplier Code of Conduct. Within our procurement contracts and general terms and conditions of purchase, we emphasise the importance of high ethical standards, including the condemnation of forced and child labour. We will cease trading with suppliers that do not share our values.

Third-Party intermediaries (TPI) must complete a due diligence check to be recognised as a Flint Group partner. By adhering to our Code of Conduct, they commit not to breach human rights.

Board Approval

This Modern Slavery and Human Trafficking Statement pursuant to Section 54 of the UK Modern Slavery Act 2015 covers all Flint Group subsidiaries and demonstrates our ongoing commitment to prevent modern slavery and human trafficking in our business and supply chains. It is reviewed annually and published on our homepage www.flintgrp.com

This statement was approved by the Flint Group Board of Directors on May 28th2025.

A handwritten signature in black ink, appearing to read 'Jeremy Berenzweig', is written in a cursive style.

Jeremy Berenzweig

General Counsel