



**Flint Group Packaging Solutions
Modern Slavery and Human Trafficking Statement
for the financial year ending 31 December 2025**

Our commitment

Flint Group Packaging Solutions is committed to ethical business practices, guided by the Integrity & Compliance Director, the Flint Group Packaging Solutions Packaging Solutions 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 Packaging Solutions is committed to meeting the needs of the global Flexible Packaging, Paper & Board, Narrow Web and Sheetfed Offset industries, whether conventional or digitally printed. The company innovates and markets a wide range of ink and coating chemistries for Flexographic, Gravure, and Sheetfed Offset applications, including solvent-based, water-based, energy-curable, and vegetable oil-based technologies. Flint Group Digital Xeikon designs and markets an extensive portfolio of digital print consumables and printing engines for labels, corrugated packaging, flexible packaging, documents, and commercial applications. The company's DAY® transfer media and Varn® chemicals businesses support Sheetfed Offset printers. Flint Group Packaging Solutions has designed tailored services and colour management solutions to enhance print process efficiency, reduce waste, and improve colour consistency. The company aims to support its customers through continuous innovation and the development of sustainable and regulatory-compliant products, while maintaining exceptional service levels and supply security. Flint Group Packaging Solutions employs some 5,000 people. Revenues for 2025 were €1.4 billion.

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 Packaging Solutions 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*** aligns with ISO 37002:2021 and 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 Packaging Solutions sites
- **Global Learning and Development Policy** supports structured employee development and reinforces awareness of ethical practices, human rights, and compliance expectations
- Integration of the **human rights considerations** into stakeholder assessment (Third-Party Intermediaries, suppliers)

All policies are accessible via the Flint Group Packaging Solutions 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 Packaging Solutions 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 Packaging Solutions, 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. All job advertisements are designed and reviewed to be free from bias and discrimination, ensuring equal opportunities for all applicants. Flint Group Packaging Solutions does not charge any worker placement, service, or residency fees, and workers are not required to pay any recruitment fees at any stage of the hiring process, 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 2025, over 1,600 employees participated, raising 99 issues that were reviewed and addressed.

Internal audits further strengthen our due diligence efforts. In 2025, our independent audit team conducted 26 site and functional audits, resulting in over 310 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. In 2025, 73 cases were reported to our Integrity Assurance Hotline. Investigations are conducted independently by trained internal audit function such as Human Resources and Internal Audit and reported to the Hotline Compliance Committee and to senior leadership (if applicable), ensuring transparency and accountability.

Due diligence within our supply chain

Flint Group Packaging Solutions 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 Packaging Solutions 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 Packaging Solutions 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 Packaging Solutions 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 Packaging Solutions 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 Packaging Solutions 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 Packaging Solutions' 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 Packaging Solutions **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 Packaging Solutions 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 Packaging Solutions 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 2025 all employees working for Flint Group Packaging Solutions were **above the minimum hiring age** in every country where we operate. In 2025 all Flint Group Packaging Solutions workers were above 18 years old.

Cases reported to Flint Group Packaging Solutions Assurance Hotline [addressing Child labour, forced labour, discrimination, environmental protection, health and safety]

In 2025, Flint Group Packaging Solutions received 73 complaints via the Flint Assurance Hotline, of which **18 complaints related to discrimination or harassment, and 3 complaints related to environmental protection, health and safety.**

All 21 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 2025, we continued this positive trend, lowering the number of reportable incidents at Flint Group Packaging Solutions sites to 13, resulting in a TIR of 0.26. This represents a reduction of 13.3% compared to 2025 TIR of 0.30.

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 2025, 18.5% 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 Packaging Solutions' 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 2025, 84% of our top suppliers were adhering to Flint Group Packaging Solutions Supplier Code of Conduct.

In 2025, 85% of our Third-Party Intermediaries were adhering to Flint Group Packaging Solutions Code of Conduct.

Understanding and Preventing Modern Slavery and Human Trafficking

Internal employee training

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

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

Training programmes are available in up to 17 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

In 2025, we further strengthened our approach by implementing a Global Learning and Development Policy, providing a structured framework for employee development and reinforcing training on key topics including human rights and compliance across our global workforce.

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 2025 we assigned several Integrity & Compliance (I&C) courses to our employees. These courses covered key topics including Speak Up Culture; Sustainability; Health, Safety and Environment (HSE); Anti-bribery and Corruption; the Code of Conduct; Data Privacy; Fraud; Human Rights; Prevention of Harassment and Discrimination; Trade Compliance; Workplace Harassment and Violence in Canada; and Supporting Better Mental Health.

- 87% of the I&C courses allocated to Flint Group Packaging Solutions employees were completed
- 84% of the human rights training courses allocated to Flint Group Packaging Solutions employees were completed

External employee training

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

Increase business partner awareness

Flint Group Packaging Solutions 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 Packaging Solutions 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 Packaging Solutions 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 Packaging Solutions 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 Packaging Solutions Board of Directors on May 26th 2026.

A handwritten signature in blue ink, appearing to read 'Darren Miller', is written over a horizontal blue line.

Darren Miller
Chief HR Officer