

MODERN SLAVERY ACT REPORT



70
ANS – YEARS

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Modern Slavery Act Statement

We regard the eradication of forced labor and child labor as an essential and fundamental aspect of our business governance. Our commitment to these principles is unwavering, ensuring that all our suppliers and team members strictly adhere to these standards. Protecting and respecting the rights of every individual against these unethical practices is at the core of our values.

1. Introduction

Ampak Inc., our groups and divisions are committed to upholding and respecting one's basic human rights and principles. We take pride in leading by example with integrity at the heart of everything we do. We believe it is our corporate responsibility to place the highest importance on protecting the dignity of all persons and seek to empower our team, their values, skills and experiences. As a Canadian business, we align our practices with national and international standards to promote human rights and ethical labor practices. This report outlines the steps we have taken during the fiscal year 2023.

2. Company Structure & Supply chains

Ampak is a leading manufacturer and distributor of bottles, containers and packaging components made from HDPE, PET, PP, metal and glass. Established 70 years ago, Ampak is dedicated to pushing boundaries and redefining what is possible in the packaging industry. Ampak leverages its unparalleled vertically integrated solutions by having full visibility and control over R&D, supply chain, production, warehousing and its distribution process. Our wide-ranging expertise is met with consistency and precision in every packaging component we manufacture and distribute. The company is dedicated to sourcing from regions and factories that respect human and workers' rights. This commitment is integrated into our comprehensive sourcing guidelines, ensuring that we source from countries and business partners adhering to workplace standards and business practices aligned with our values.

3. Policies

Ampak strives to uphold the rights of all employees through formal policies, code of conducts and comprehensive compliance standards. Our view is to continuously improve our commitment to engage in ethical business practices. Ampak expects all parties who do business with any division of the Ampak group to conduct business in the ways that support the principles of our policies and commitments.

Our code conduct emphasizes respect for human rights, fair treatment and labor rights. It is the basis of our ethical framework. Our supplier code of conduct establishes stringent labor standards explicitly prohibiting forced labor and child labor. Suppliers are expected to uphold these standards in their operations and throughout their supply chain.

4. Commitment

Ampak shares its responsibility with everyone. Our commitment extends to every level within our organization as well as our suppliers and business partners.

5. Risk Assessment

Ampak regularly conducts risk assessments to identify possible risks to modern slavery within our operations and supply chains. This involves evaluating our supply chain for vulnerabilities, particularly in high-risk regions and industries.

6. Due Diligence

- Comprehensive supplier assessments and audits
- Thorough background checks required for all new suppliers
- Ongoing monitoring and re-evaluation of existing suppliers
- Collaboration with third-party experts and organizations to enhance our due diligence efforts

7. Training & Awareness

Ampak provides a comprehensive orientation training on all internal company policies when onboarding new employees. Additional training and tools continue to be provided to identify signs of possible forced labor and the steps to follow if such practices are suspected.

8. Monitoring & Auditing

Our team conducts regular reviews of all operations to ensure compliance with forced labor and child labor. Any non-compliance is reported to senior management and addressed promptly.

We conduct both scheduled and surprise audits of our high-risk suppliers. These audits involve on-site inspections and thorough reviews of labor practices and conditions.

9. Reporting & Whistleblowing

We have established multiple channels for reporting concerns related to forced labor and child labor issues. These channels are accessible to all employees.

Our Whistleblowing Policy ensures that individuals who report suspected issues are protected from retaliation. We take all reports seriously and conduct thorough investigations to address any issues.

10. Progress & Impact

Ampak has conducted audits of suppliers achieving our approved standard of compliance and trained all employees and continue to train suppliers. We continue to address child labor and forced labor risks in lower-tier suppliers, ensuring consistent enforcement of policies across different regions.

11. Remediation of Loss of Income

We did not identify any instances of forced labor or child labor within our operation or supply chain in 2023. Therefore, no remedial measures were required.

12. Future Steps

Our improvement plans include expanding the scope of our supplier audits, develop advanced training programs tailored to different roles within the company. We continue strengthen partnerships with our suppliers and business partners.

Ampak's targets for 2024 is to achieve compliance with our Supplier Code of Conduct among high-risk suppliers. Continue to train all employees and suppliers on child labor and forced labor and conduct follow-up audits to ensure continuous improvement is maintained.

13. Approval and Attestation

Ampak Inc. recognizes that this is an ongoing effort that requires continuous vigilance, improvement, and collaboration. By upholding the highest ethical standards and fostering a culture of transparency and accountability, we aim to ensure that our business practices respect and promote human rights across all aspects of our operations.

I attest that I have reviewed the information contained in the report for the entity listed above. 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 above.

Rosanna Vernucci

Title: VP of Sales and Operations

Date: 2024-05-30

Signature: _____