



**Mondi Group**

Human trafficking and modern slavery statement 2023

# Mondi's human trafficking and modern slavery statement 2023

This document is our 'human trafficking and modern slavery statement' for the 2023 financial year (1 January 2023 to 31 December 2023) required in accordance with Section 54 of the UK Modern Slavery Act 2015 (the "Act").

It outlines the steps we have taken during the financial year and the measures that we plan to put in place in future to address potential risks of slavery, servitude and forced and compulsory labour, human trafficking, sexual exploitation and child labour within our operations and supply chain.

We have a clear commitment in our MAP2030 Mondi Action Plan 2030 (MAP2030) to further strengthen governance systems to prevent human rights violations and remedy any adverse impacts. Our management activities related to modern slavery are an integral part of our approach to human rights.

In 2023, we continued the implementation of the Human Rights Due Diligence (HRDD) approach in all our operations through a detailed risk identification and assessment, which forms the baseline for our action plan and roadmap going forward.

To improve transparency and risk management in our supply chain, we introduced a robust third-party sustainability rating tool. This further supports us to strengthen our Responsible Procurement process as we continue the scale up across our supplier base. At year end, 1.1% of the 460 supplier production sites screened in the 2023 pilot remained potential high-risk with clear actions for risk mitigation defined.

In 2023, we had messages related to 90 incidents from our grievance and whistleblowing platform SpeakOut, and through other channels.

No incidents were related to modern slavery or human trafficking. We have improved the SpeakOut guidance online and rolled out a specific supplier communication campaign.

Our training sessions included in-depth workshops and awareness raising for modern slavery with dedicated networks in Safety and Human Resources.

To date, we have not found any instances of violation of human rights or modern slavery in our operations or supply chain. Nevertheless, we remain committed to continuously improving our approach and working towards our MAP2030 targets.

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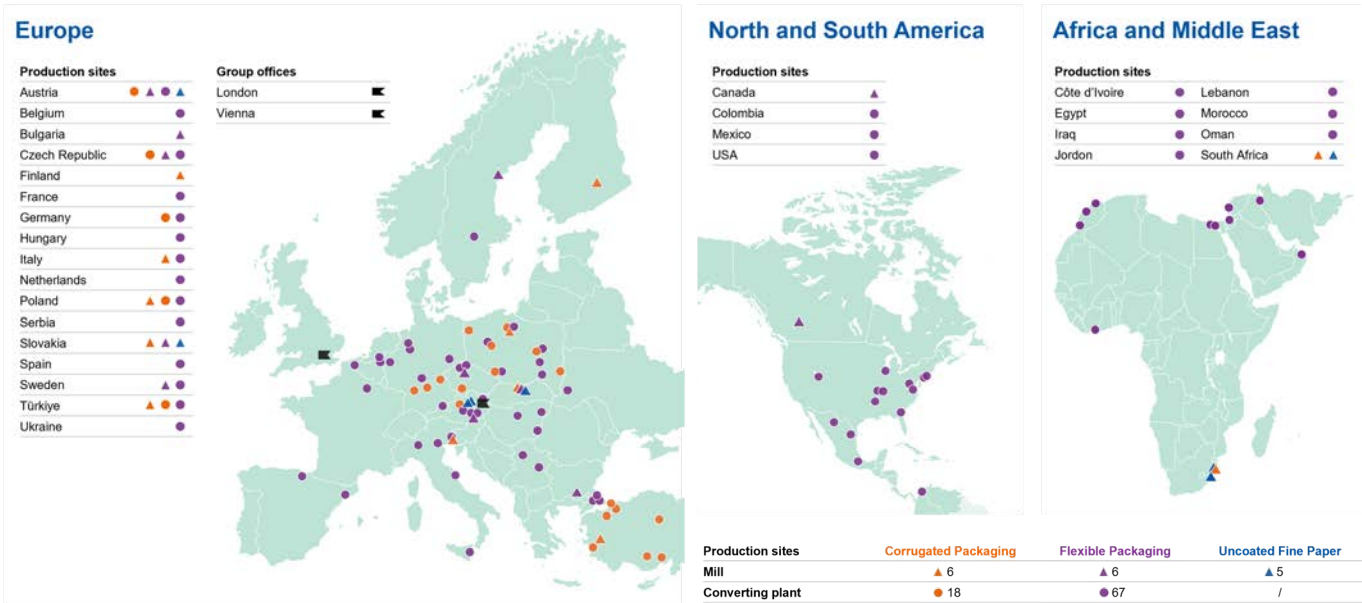
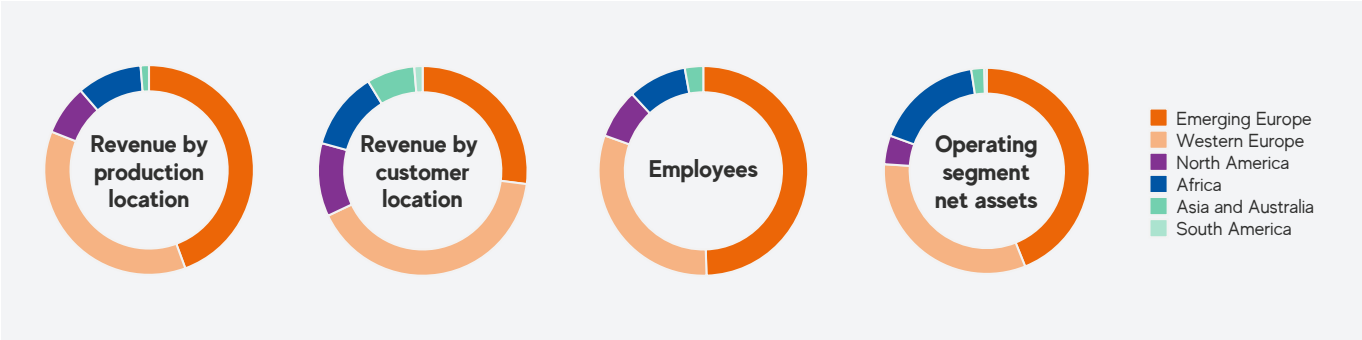
# Our organisational structure, businesses and supply chain

Mondi is a global leader in packaging and paper, contributing to a better world by producing products that are sustainable by design. We employ 22,000 people in more than 30 countries and operate an integrated business with expertise spanning the entire value chain, enabling us to offer our customers a broad range of innovative solutions for consumer and industrial end-use applications. Sustainability is at the centre of our strategy, with our ambitious commitments to 2030 focused on circular driven solutions, created by empowered people, taking action on climate.

The Group is structured around three business units:

- Corrugated Packaging producing containerboard and corrugated solutions
- Flexible Packaging producing kraft paper, paper bags, consumer flexibles and functional paper and films
- Uncoated Fine Paper producing office paper and professional printing paper

In 2023, Mondi had revenues of €7.3 billion and underlying EBITDA of €1.2 billion. Mondi has a premium listing on the London Stock Exchange (MNDI), where the Group is a FTSE100 constituent, and also has a secondary listing on the JSE Limited (MNP).



In addition to those countries represented graphically on this page, Flexible Packaging operates four production sites in South East Asia.

# Our organisational structure, businesses and supply chain

## Our employees and contractors

Mondi employs 22,000 people in over 30 countries. More details on employee structure can be found in our [Sustainable Development Report – Consolidated performance table](#).

Compliance with the law, respecting human rights beyond compliance, and being a fair employer are foundations of our employment practices. Internationally recognised standards, partnerships and control mechanisms support our approach, as reflected in our Labour and Human Rights Policy (see ‘Policies and governance’).

We do not allow or condone the imposition of financial burdens on employees and contractors, including recruitment fees or withholding wages. The information on our performance against this principle is available locally at our operations through the Human Resources function. Through our central human resource information system, we are increasing transparency on recruitment and retention, remuneration and performance appraisal.

We had an average of 12,411 contractors working for Mondi across our operations in 2023. Our contractor numbers fluctuate slightly due to timing of the maintenance shuts at our pulp and paper mills throughout the year. Harvesting activities at our forestry operations are kept fairly constant.

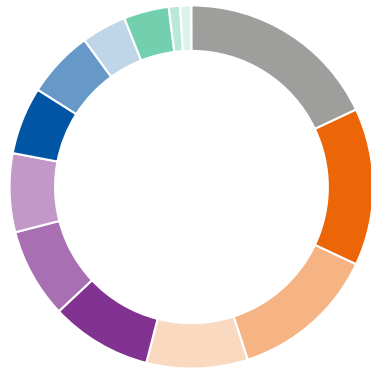
We monitor the recruitment mechanisms for our contractors at a local site level. We directly commission the companies that provide repair and maintenance services for the annual maintenance shuts at our pulp and paper mills. Similarly, for harvesting activities in our forestry operations in South Africa, we hire contractor companies that specialise in harvesting operations instead of hiring the workers directly. Most of our contractors are considered skilled workers with technical knowledge and hired by their respective companies on a legal and predominantly permanent basis. We are reviewing our processes related to contractor risk management, including recruitment practices, to further identify and mitigate potential risks.

## Our supply chain

In 2023, our global supply chain included around 12,000 suppliers in 69 countries worldwide. We procured €6.2 billion worth of goods and services from our suppliers with products and services purchased locally, representing 57% of our overall spend. Our Group Procurement function manages the sourcing of our main raw materials, indirect spend and services and leads the supplier relationship processes. Additionally, we have a dedicated fibre sourcing team to manage the wood and paper for recycling categories. Our key areas of spend and major procurement categories are illustrated in the breakdown of supply spend chart.

More details on our key inputs (energy and material procured from tier 1 suppliers) and outputs (products and energy produced for sale to our customers, as well as waste, energy, water- and air emissions generated) can be found in our [Sustainable Development report](#) on page 87.

Breakdown of supply spend (%)



Due Diligence Management System

Wood and pulp	18
Responsible Procurement process	
Capital expenditure	14
Paper and paper for recycling	13
Plastics and films	9
Transport	9
Energy	8
Indirect spend	7
Chemical, starch and filters	6
Technical procurement	6
Other	4
Printing/adhesives and packaging materials	4
Aluminium	1
Silicone	1



## Policies and governance

### Leadership and accountability for human rights

The Board approves our approach and reviews performance, including addressing risks related to modern slavery and human trafficking. An independent non-executive director chairs the Sustainable Development (SD) Committee, which oversees the Group's sustainability approach, policies, performance and commitments. The committee confirms updates to the SD policies, reviews Mondi's Human Rights Due Diligence process and recommends Mondi's Modern Slavery Act statement to the board for approval. In addition, the committee is responsible for the governance of matters related to the environment, climate change, labour, human rights, biodiversity, and product stewardship. More information about our sustainability governance can be found in our [Sustainable Development report](#) on pages 93-95.

While the Board has ultimate accountability for sustainability issues, including human rights, modern slavery and human trafficking, Mondi's Business Units establish appropriate responsibilities and procedures at a local level, guided by values and principles set out at the Group level. Details of this process can be found in our [previous statements](#).

### Policies

Our Sustainable Development (SD) policies form part of our Sustainable Development Management System (SDMS) and outline our overall approach and key issue-specific sustainability areas of focus. They provide the essential framework and requirements that set out where we stand on sustainable development. The SDMS includes policies, operating standards, and practice notes, which support us in applying a consistent and standard approach to sustainability throughout our operations. Activities undertaken by contractors, either on Mondi sites or while under our management, are covered and are required to comply with our policies, standards and requirements.

Our Group policies are published on our website and additional guidance for implementing Group-wide policies is provided to Mondi employees through our global intranet, planetmondi.

In developing and reviewing our Labour and Human Rights Policy, which includes modern slavery and human trafficking, we have consulted with stakeholders, including internal experts in our Sustainability, Human Resources, Legal and Procurement teams, and external stakeholders with expertise in the relevant areas of risks we are working to mitigate. The Board, supported by the SD Committee, reviews and approves the Group's policies annually. Our annual updates address any changes in the sustainability landscape, regulatory requirements and stakeholder expectations.

In 2023, we made sure the wording around our commitment to a safe working environment is consistent across our Labour and Human Rights Policy and the Code of Conduct for Suppliers. Both documents now clearly state that workplaces are to be kept free of harassment, harsh treatment, violence, intimidation, corporal punishment, mental or physical coercion, intimidation, and verbal or sexual abuse. We also explicitly prohibit the use of threats of violence, such as retaining employees' identification, passports, work permits, deposits, or recruitment fees as a condition of employment.

An overview of the development of the Labour and Human Rights Policy can be found in our [previous statements](#).



## Policies and governance

### Code of Conduct for Suppliers

Our Code of Conduct for Suppliers addresses the following areas: legal compliance; product safety, environment and climate; safety and occupational health; labour and human rights; and business ethics.

To address the risk of modern slavery and human trafficking in the supply chain, the Code covers aspects such as work permits and employment contracts, fair wages, trade unions, child labour, harassment, inhumane treatment, modern slavery and human trafficking.

In our 2023 review and update of the Code, we included additional clarity on reporting non-compliances and grievances. We have outlined that our confidential SpeakOut reporting platform is available for all employees, customers, suppliers, partners and other stakeholders. We have also updated the wording in the appendix related to human rights to better align with relevant international standards, including clear reference to recruitment fees, misbehaviour of private or public security forces and identification, assessment and management of human rights risks and impacts.

All Mondi Group companies and business units worldwide, including joint ventures where we have a controlling interest, are required to apply this Code to their suppliers of all goods and services, irrespective of the jurisdiction in which they operate and the laws applicable to such jurisdiction (where this Code represents a higher standard). Where we have a non-controlling interest, we encourage the application of this policy with our business partners. The Code is available in multiple languages on our [website](#) and is reviewed and updated annually.

We continue to roll out our Code of Conduct for Suppliers to all our suppliers, and require them to:

- Identify human rights risks and impacts, assess them, and implement appropriate management controls and corrective action, when relevant.
- Have in place adequate remedial mechanisms in case of any violations
- Notify Mondi immediately in writing if they become aware of or have reason to believe that they or any of their officers, agents or companies operating within their own supply chain have breached any of the requirements of the Code.

Suppliers shall be aware of all sites and companies involved in their production and supply network, and should, upon request, provide Mondi with adequate details of the supply chain for the goods and/or services supplied to Mondi. Suppliers are responsible for ensuring that their employees, representatives, contractors and subcontractors understand and comply with the requirements of our Code. We expect our suppliers to apply similar requirements for their own supply chain. Should any instances of non-compliances be identified, we may require appropriate action on a case-by-case basis. For instance, any violation of human rights-related or environmental obligations may require appropriate remedial action to prevent, end or minimise the extent of the violation. Failure to take effective corrective or remedial action may result in suspension or termination of the supplier contract/business relationship. Our Group Procurement function is responsible for the Code and its roll-out and (supported where relevant by other functions) also implements the Responsible Procurement process. We believe this approach increases the effectiveness of our due diligence by virtue of a shared governance and policy structure.

### Mondi Group policies

Labour and Human Rights Policy	Defines our commitment to respecting internationally accepted human rights and standards. It outlines our responsibility concerning our employees, covering fair working and recruitment practices, rights of collective bargaining and freedom of association and clear statements of no tolerance for modern slavery, human trafficking and child labour.
Safety and Occupational Health Policy	Outlines Mondi's core value of protecting our employees' and contractors' safety, health, mental wellbeing and security through the development and implementation of local safety and health management systems.
Supply Chain and Responsible Procurement Policy	Defines supply chain transparency and sustainability as integral principles of supplier management in Mondi by outlining the Code of Conduct for Suppliers as minimum requirements and assessments, in-depth performance reviews, training and long-term partnerships as means to implement our risk-based approach and work for continuous improvement.

### Specific requirements for suppliers

Code of Conduct for Suppliers	Defines the minimum standards for our suppliers for environmental, social and governance topics, and other legal and ethical issues.
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### Sustainable Development Management System (SDMS):

#### Detailed guidance for Mondi operations and employees (internal documents)

Human Rights Operating Standard	Guides local management to implement the Labour and Human Rights Policy and defines minimum requirements for operations to identify, prevent, mitigate and account for how they address human rights risk and impacts
Human Rights Due Diligence Practice Note	Supports the implementation of the Human Rights Operating Standard through detailed explanation and instructions on the individual steps to implement the Human Rights Due Diligence in an operation
Code of Business Ethics	Sets out the five fundamental ethical principles that govern the way in which Mondi and its employees conduct business. Mondi's respect of the Universal Declaration of Human Rights is one of these principles. The application of the aforementioned is documented in the Sustainable Development policies outlined above.



## Due Diligence

Our Human Rights Due Diligence (HRDD) is a continuous management process that includes the integration of human rights considerations into our relevant business processes to identify and assess risks, define action plans and ensure appropriate management controls are in place.

In our MAP2030 framework, we have defined the commitment to strengthen governance systems to prevent human rights violations and remedy any adverse impacts. Modern slavery and human trafficking are an integral part of our approach to human rights.

In 2021, we achieved our first target for MAP2030 on human rights with the development of our Human Rights Due Diligence (HRDD) methodology. The methodology is based on the UN Guiding Principles for Business and Human Rights and follows six steps that help us to identify, mitigate and remediate the human rights risks within our own operations and business relationships.

We collaborated with external human rights experts to review our due diligence processes in light of new legislation, such as the German Supply Chain Act and the upcoming EU Corporate Sustainability Due Diligence Directive. The review confirmed that we already have the required processes in place, with certain elements that could be further improved. The recommendations from the experts will be integrated into our human rights action plans and roadmap going forward.

The Mondi Sustainable Development Committee of the board has considered Mondi's approach to human rights and received an update on the MAP2030 human rights commitment, confirming that no human rights adverse impacts or severe risks were reported by the operations. The board reviewed the areas for focus and action plans presented.

### Whistleblowing and grievance mechanisms

We provide internal processes and tools to facilitate the reporting, investigation, and resolution of reported incidents, including those related to potential human rights violations, such as modern slavery and human trafficking. Our operations make channels to raise concerns, such as SpeakOut, available to the public and employees alike.

SpeakOut is our anonymous whistleblowing and grievance platform operated by an independent third party, where anyone can raise concerns or alerts on potential violations to our Code of Business Ethics. Access to SpeakOut incident information is restricted to named responsible people. The Internal Audit function is responsible for monitoring the SpeakOut process, with the Audit Committee and Board providing oversight.

Every Audit Committee and Board meeting includes a summary of reported concerns, the status of unresolved items and actions taken in response to the allegations. More information about the process of our SpeakOut platform can be found in our [previous statements](#).

In 2023, we updated our website to provide clear guidance on using SpeakOut and how the process works. We've also launched a communication campaign to inform suppliers in Germany about the platform, which reflects the local requirements of the Supply Chain Act.

In 2023, we had messages related to 90 incidents (2022: 47) from SpeakOut and through other channels. Topics encompassed allegations concerning work-related harassment and unfair treatment, labour rights and health & safety matters. We took measures and corrective action for all issues.

Details on specific cases are not disclosed due to confidentiality, but incidents with potential human rights impacts, such as harassment and unfair treatment at the workplace were immediately addressed, and measures were taken to address the incidents, ranging from disciplinary measures, professional training for behaviour and organisational change, as well as counselling and support for rightsholders.

We address and treat all SpeakOut messages with utmost discretion and involve the appropriate Mondi management teams when necessary, following standard procedures.

While we welcome the absence of reports pointing to modern slavery or human trafficking, we recognise that such risks may exist. We work to ensure our mechanisms for identifying, mitigating and remediating them are appropriate. We will continue to work on aligning SpeakOut with the specific requirements related to human rights standards, particularly, the effectiveness criteria for grievance mechanisms as set out in Principle 31 of the UN Guiding Principles.

### Human Rights Due Diligence Process



## Risk assessment and management

Our Group-wide risk management framework is designed to address strategic, financial, operational and compliance risks that could undermine our ability to achieve our business objectives. We update our risk register annually, including our sustainable development risks, to ensure mitigation plans are in place to address those risks.

The Group's principal and emerging risks are reviewed by either the Board, the Audit Committee or the Sustainable Development Committee through the course of the year, considering the detailed risk description, the controls and mitigating actions in place, the extent of assurance obtained, and the residual risk exposure. Potential impact and mitigation of human rights and modern slavery risks are included in the Group's compliance risks. More information about our risk management framework and principal risks can be found in our [Integrated Report](#) on pages 69-80.

Our priority human rights risk areas are determined by and take into consideration any inherent risks in countries where we operate, as well as our business processes, industry risks and legislative requirements. While we consider all human rights as important, we focus on the most salient topics for our operations: fair working conditions, freedom of association and collective bargaining, indigenous and land rights, modern slavery, child labour and safeguarding our environment. We regularly review our operational impacts through stakeholder engagement, including collaboration with external human rights experts and engaging with our partners across the value chain, as well as in the communities where we operate.

### In our own operations

Many of our existing assessments and procedures include consideration of human rights issues, typically involving health and safety, labour law compliance, community impact assessment and environmental due diligence.

We have confirmed our human rights focus areas through our risk-based approach and risk identification process, which consider local context, prior incidents, and established practices. In 2023, for the first time all our operations completed a Human Rights Risk Identification questionnaire.

The questionnaire identified no adverse impacts identified in Mondi operations. Specifically, it did not surface any cases related to forced labour and modern slavery and confirmed that the management practices to address the risk of modern slavery in Mondi operations are well established in most operations.

We combined the findings of the Human Rights Risk Identification questionnaire with external resources, such as public human rights indices including the Global Slavery Index (GSI) and the Trafficking in Persons Report (TIP) and risk screening platforms such as EcoVadis IQ to get a holistic view about the human rights risks of our operations.

We assessed and prioritised the results of the risk identification process using HRDD methodology, considering the severity (scale and scope) and likelihood for rightsholders. We also consulted with external human rights experts to validate our understanding of the risks identified, which confirmed our finding that there were no adverse human rights issues reported in Mondi operations.

The findings help us to develop a holistic understanding of the risk mitigation practices in place and serve as a baseline for an action plan and roadmap going forward. We have determined specific areas where we can improve our processes and procedures to further reduce the risk of human rights violations in our operations.

Related to modern slavery, we identified some processes that, if not properly managed, have a potential to increase the risk of exploitation of vulnerable groups. Establishing good practices in these areas helps us to continue to improve our risk mitigation practices for modern slavery. Some of the processes identified include provision of workplace essentials, wage deductions as disciplinary measure and missing guidance for human resource professionals in working with agencies.





## Risk assessment and management

### In our supply chain

We coordinate our global procurement of wood through a dedicated fibre sourcing team and other materials and services through a central procurement function. To address the specific requirements related to the procurement of wood and pulp, we have a Due Diligence Management System (DDMS), which verifies that we purchase all our wood fibre from responsible sources in line with our commitment to zero deforestation. For all other materials and services, we identify sustainability risks and assess supplier performance through our Responsible Procurement process, which improves transparency and supports supplier engagement.

#### Responsible Procurement process

We apply a risk-based approach to assess suppliers against our Code of Conduct for Suppliers. In 2023, we began collaborating with the global sustainability rating company EcoVadis to support us to identify and mitigate risks in our supply chain. Having this third-party tool supports our supplier assessment, providing a scalable platform with enhanced transparency to mitigate risk in our supply chain.

The process includes an initial screening which indicates risks in four areas: environment, labour and human rights, ethics, and sustainable procurement.

In 2023, we ran the Responsible Procurement process with a selected pilot group of 460 Mondi suppliers that represented a range of products and geographies. Based on the results of the risk screening conducted with these suppliers, we invited 36 suppliers identified as potentially high sustainability risk to participate in an individual assessment by EcoVadis.

These EcoVadis scorecards, which provide analysis into the strengths and areas of improvement for each supplier, allowed us to de-escalate 23 suppliers. We classified the five supplier sites, that were unresponsive or declined the assessment, as remaining potential high-risk, representing 1.1% (2022: 0.3%) of suppliers evaluated in 2023. Our standard process for resolving these remaining cases includes new assessments, audits, revisiting contractual agreements or switching to alternative suppliers.

Going forward, we will move from our annual Responsible Procurement process to continuous campaigns that run simultaneously, so our approach better responds to business and regulatory needs. We continue our dialogue with the 8 suppliers with ongoing assessments or corrective action plans. We monitor the share of suppliers in scope that are undertaking assessments or corrective actions at year-end reporting.

Since the launch of the Responsible Procurement process, we have assessed over 7,000 supplier sites up to year-end 2023 (approximately 71% of our total spend). Our focus is on identifying inherent risks in our supply chain, assessing supplier performance and working on corrective actions.

More detail on our Responsible Procurement process is outlined in our [previous statements](#). The Board's Sustainable Development Committee reviews and discusses the process annually, including the follow-up with those suppliers that were classified as high-risk.

### Responsible wood sourcing and certification

Our dedicated Due Diligence Management System stipulates that all our wood fibre (round wood, wood chips and market pulp) is purchased from responsible sources in line with our policies. We do not accept wood fibre from sources where critical biodiversity and important ecosystem values are threatened, or where the fundamental rights of workers and communities are violated. To manage the risks, we use independent voluntary certification schemes, such as FSC<sup>TM</sup> (Forest Stewardship Council<sup>TM</sup>)\* and PEFC (Programme for the Endorsement of Forest Certification). Their standards require fulfillment of human rights based on the ILO Declaration on Fundamental Principles and Rights at Work, including modern slavery topics, such as the use of forced labour and child labour.

100% of wood fibre sourced originates from responsible sources, which are declared as PEFC or FSC-certified, or FSC Controlled Wood as a minimum. Additionally, to confirm supply chain integrity, we ensure that 100% of our pulp and paper mills, have valid FSC and/or PEFC chain of custody certification. Both certification systems require annual third-party audits conducted by independent accredited certification bodies.

More information about our responsible wood sourcing and forest certification can be found in our Sustainable Development report on pages 87 – 91.

\*The license number of Mondi Paper Sales GmbH is FSC-C012179 and Mondi Paper Sales – Uncoated Fine Paper is FSC-C015522.

## Training

Training is an important component of our approach to addressing potential modern slavery and human trafficking risks. It helps raise awareness of potential risks, inform our people of our policies and approach, improve knowledge and learning across the Group, and provides the tools and know-how to relevant teams on how to monitor, report and manage risks and incidents.

We have undertaken training of different employee groups since the introduction of the UK Modern Slavery Act. As part of sharing our MAP2030 framework, specific sessions to introduce the commitments and targets related to responsible procurement, business ethics & governance, and human rights were held with the global Procurement team, Sales and Marketing functions.

We continued our training on human rights and modern slavery, including live webinars and on-demand e-learning courses accessible to all employees.

With the Human Rights Risk Identification questionnaire roll-out, we engaged with business and local management teams as well as colleagues from Human Resources to raise awareness and provide guidance for the risk identification and mitigation measures.

In 2023, we continued to focus on improving our understanding of modern slavery and review our risk prevention practices. With guidance from external human rights experts, we conducted deep-dive workshops to raise awareness and reflect on mitigation practices with our global Safety and Human Resources networks. These workshops led to concrete action plans, which include the review and development of guidance material for relevant functions to improve risk mitigation processes, identify signs of modern slavery and understand actions needed to address human rights risks.

We provided over 200 hours of training related to human rights and modern slavery to expert networks, such as Safety and Human Resources specialists. These teams apply and share the knowledge where relevant across Mondi's operations. We keep working on our roadmap for building the required competencies across our businesses to integrate human rights into all relevant management processes. This includes training to cover the broad spectrum of expertise needed in local businesses, central functions, management skills and general awareness for modern slavery and human rights.

Our existing approach to training, covering modern slavery and human trafficking risks, focuses on permanent employees of Mondi. We recognise that it is important for our suppliers to understand our approach and how to address risks, including modern slavery and human trafficking, this will be important to secure the integrity of our supply chain in future.



## Evaluating the effectiveness of our approach

During 2023, the Executive Committee and the SD committee discussed the progress Mondi is making in addressing its modern slavery risks, including an overview of Mondi's processes and procedures to minimise the risk of human trafficking and modern slavery. The Board's SD committee approved Mondi's UK Modern Slavery Act statement 2023.

Our sustainability framework, Mondi Action Plan 2030 (MAP2030), sets out the targets and milestones we need to achieve to meet our ambitious sustainability

commitments. See our [Sustainable Development report](#) for more details. Several MAP2030 commitments and targets set under Responsible Business Practices – particularly under 'responsible procurement' and 'human rights' – support our human rights efforts, that imply our approach to address modern slavery.

Further KPIs from other focus areas and existing practices support our human rights approach, from health and safety to environmental emissions and incidents, community impact assessments, and

SpeakOut results, among others. We monitor the performance against the set targets and report transparently on our progress in our Sustainable Development Report.

We will continue to review and evaluate the scope and effectiveness of the current mechanisms to improve risk assessment, identification and reporting of human trafficking and modern slavery risks in order to strengthen our approach going forward.

Approach	Progress 2022	Progress 2023	Next steps
<b>Policy &amp; Governance</b> Commitment to strengthen governance systems to prevent human rights violations and remedy any adverse impacts	Roll out of Operating Standard and Practice Note supporting operations to implement the Group Labour and Human Rights policy	Harmonised our Code of Conduct for Suppliers and Human Rights Policy with clear wording and description of requirements for safe workplaces	Continue to integrate human rights-related findings into our relevant management processes, so that they are considered in all our actions and decisions.
<b>Due Diligence</b> Targets to have Human Rights Due Diligence (HRDD) in all operations by 2025 and all impacts addressed by 2030	Completed pilots for the HRDD approach in two operations and identified human rights focus topics for Mondi Group. This formed the basis for our risk-based approach which we continue to develop	Implementation of the HRDD approach initiated in all our operations through detailed risk identification to form a baseline for our action plan and roadmap going forward	No adverse impacts identified in our operations. We will work on the focus areas identified to continue to mitigate our human rights risks
<b>Supplier Risk Assessment</b> Commitment to mitigate risks and create greater transparency in our supply chains through our responsible procurement process	Risk assessment focused mainly on newly onboarded and reactivated suppliers. One supplier production site (0.3% of 369 screened) remained residual high-risk (not related to modern slavery), with escalation steps defined.	We introduced a third-party sustainability rating tool, improving transparency and risk management in our supply chain and strengthening our Responsible Procurement process for scale up across our supplier base. At year end, 1.1% of the 460 supplier production sites screened in the pilot remain potential high-risk with clear actions for risk mitigation defined.	Continue dialogue with our suppliers and adapt our process to a continuous one that better responds to business and regulatory needs. Maintain the focus on suppliers that are undertaking measures and corrective actions.
<b>Grievance Reporting</b> SpeakOut is Mondi's anonymous channel, operated by an independent third party through which anyone can raise concerns on potential violations to our Code of Business Ethics.	In 2022, we had a total 47 incidents, 45 from SpeakOut and 2 reported cases through other channels. No incidents related to modern slavery or human trafficking were reported.	In 2023, we had messages related to 90 incidents from SpeakOut and through other channels. No incidents were related to modern slavery or human trafficking. We improved SpeakOut guidance online and ran a targeted supplier communication campaign.	Roll-out of communication campaign and improve information material to raise awareness about SpeakOut and collaboration with our psychological safety at work project.
<b>Training</b> Working with external experts and internal training sessions to raise awareness of human rights risks	In 2022, we recorded 270 hours of training on human rights policies and procedures and awareness raising for human rights and modern slavery	In 2023, we recorded over 200 hours of training on human rights and focused on workshops and awareness raising for modern slavery with dedicated networks.	Develop our training roadmap for building the required competencies across our businesses to integrate human rights into all continuous management processes.



## Closing message

This statement is made on behalf of those legal entities within the Mondi Group that had a turnover exceeding £36 million during 2023 and had directly or indirectly provided goods or services to the UK in 2023. These legal entities are included in the Appendix to this statement. All obligated legal entities within the Mondi Group have also confirmed the statement.



**Andrew King**  
**Chief Executive Officer**  
**2 May 2024**



## Appendix 1

### Obligated companies by the UK Modern Slavery Act for the 2023 financial cycle

#### Corporate

Mondi AG  
Mondi Paper Sales GmbH

#### Uncoated Fine Paper

Mondi Neusiedler GmbH & Co KG  
Mondi SCP, a.s.  
Mondi South Africa (Pty) Limited

#### Corrugated Packaging

Mondi Corrugated Swiecie Sp z o.o.  
Mondi Powerflute Oy  
Mondi Simet Sp. z o.o.  
Mondi Swiecie S.A.  
Mondi Szczecin Sp. z o.o.  
Mondi Turkey Oluklu Mukavva Kağıt Ve  
Ambalaj Sanayi Anonim Sirketi  
Mondi Wellpappe Ansbach GmbH

#### Flexible Packaging

Mondi Bags Mielec Sp. z o.o.  
Mondi Bags Swiecie Sp. z o.o.  
Mondi Békéscsaba Kft  
Mondi Coating Steti a.s.  
Mondi Coating Zeltweg GmbH  
Mondi Dynäs AB  
Mondi Frantschach GmbH  
Mondi Halle GmbH  
Mondi Heerlen B.V.  
Mondi Inncoat GmbH  
Mondi Italia S.r.l.  
Mondi Jülich GmbH  
Mondi Kale Nobel Ambalaj Sanayi Ve  
Ticaret Anonim Sirketi  
Mondi Korneuburg GmbH  
Mondi Maastricht N.V.  
Mondi Örebro AB  
Mondi Padova S.r.l.  
Mondi Poperinge N.V.  
Mondi Poznan Sp. z o.o.  
Mondi Release Liner Austria GmbH  
Mondi Solec Sp. z o.o.  
Mondi Steti a.s.  
Mondi Steti White Paper s.r.o.  
Mondi Styria GmbH  
Mondi Szada Kft.  
Mondi Trebsen GmbH