



Mondi's human trafficking and modern slavery statement 2022

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This document is our 'human trafficking and modern slavery statement' for the 2022 financial year (1 January 2022 to 31 December 2022) 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 measures that we plan to put in place in the 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 to strengthen governance systems to prevent human rights violations and remedy any adverse impacts in our MAP2030 (Mondi Action Plan 2030). Our activities related to modern slavery are integral to our approach to human rights.

In 2022, we started the implementation of our Human Rights Operating Standard and Human Rights Due Diligence Practice Note in our operations.

In two operations, we completed pilots for the Human Rights Due Diligence (HRDD) approach and identified human rights focus topics for Mondi Group as a baseline for our risk-based approach.

Our supplier risk assessment focused mainly on newly onboarded and reactivated suppliers. One supplier production site (0.3% of 369 screened) remained high-risk after the evaluation (unrelated to modern slavery), and we defined clear escalation steps.

In 2022, 47 incidents were reported in our grievance platforms, 45 from SpeakOut and two reported cases through other channels. No incidents were related to modern slavery or human trafficking.

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 making innovative solutions that are sustainable by design. Our business is integrated across the value chain – from managing forests and producing pulp, paper and films, to developing and manufacturing sustainable consumer and industrial packaging solutions using paper where possible, plastic when useful. 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 2022, Mondi had revenues of €8.9 billion and underlying EBITDA of €1.8 billion from continuing operations and employed 22,000 people worldwide. Mondi has a premium listing on the London Stock Exchange (MNDI), where the Group is a FTSE100 constituent, and has a secondary listing on the JSE Limited (MNP).

Our products serve a variety of industries, such as:

- Consumer and retail,
- Building and construction,
- Chemicals, industrial, agriculture and other, and
- Paper for home, office and professional printing.

The remaining Group revenue is derived from market pulp, wood, newsprint and energy sales.

The Group's Russian operations have been classified as held for sale and, since June 2022 results, reported as discontinued operations.

The countries where we have operations are indicated in Figure 1. The Group's subsidiaries as at 31 December 2022, including their registered offices, principal activities and percentage of shares held by the Group, are set out in note 11 of the Mondi plc parent company financial statements (page 234 -238 of [Integrated report and financial statements 2022](#)). The Group has no material joint ventures or associates.

Mondi employs 22,000 people across 100 production sites in more than 30 countries, with key operations located in Europe, North America and Africa.

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



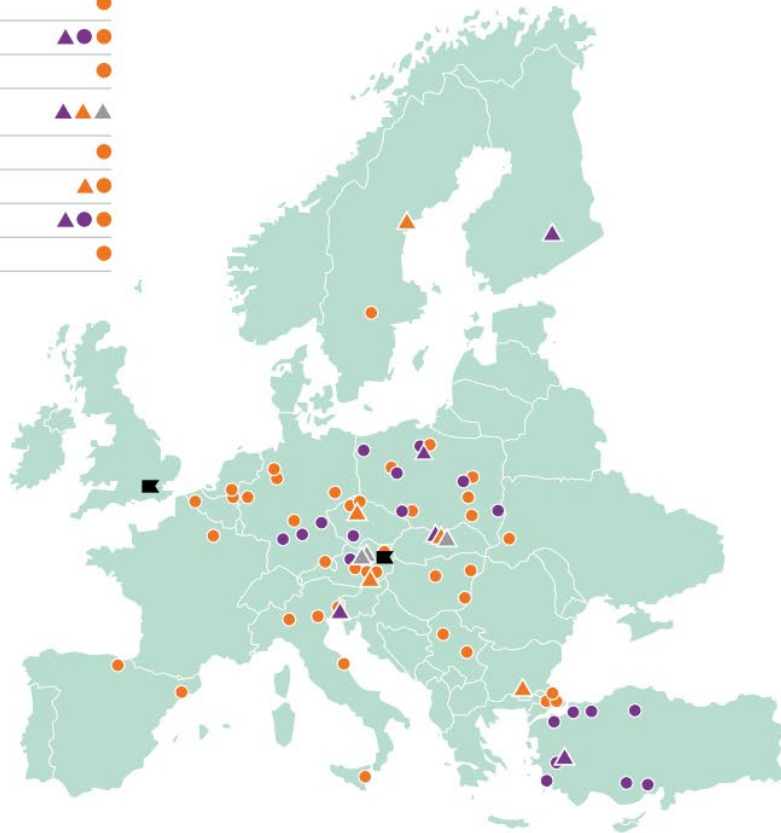
Europe

Production sites

Austria	●▲▲	Netherlands	●
Belgium	●	Poland	▲●●
Bulgaria	▲	Serbia	●
Czech Republic	●▲●	Slovakia	▲▲▲
Finland	▲	Spain	●
France	●	Sweden	▲●
Germany	●●	Türkiye	▲●●
Hungary	●	Ukraine	●
Italy	▲●		

Production sites per business unit

Corrugated Packaging	▲ Mill (6)
	● Converting plant (19)
Flexible Packaging	▲ Mill (5)
	● Converting plant (66)
Uncoated Fine Paper	▲ Mill (5)
Group offices	■ London, Vienna



North and South America

Production sites

Colombia	●
Mexico	●
USA	●



Africa and Middle East

Production sites

Côte d'Ivoire	●
Egypt	●
Iraq	●
Jordan	●
Lebanon	●
Morocco	●
Oman	●
South Africa	▲▲



Figure 1 Our countries of operation

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 withholding wages or recruitment fees. 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.

The harvesting activities at our forestry operations and maintenance shutdowns at our pulp and paper mills mean our contractor numbers varied throughout the year. We had an average of 11,629¹ contractors working for Mondi across our operations in 2022.

We monitor or report the recruitment mechanisms for our contractors at local 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, and don't hire contractors directly. Our contractors are predominantly permanent employees of these companies. 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 recruitment practices, to further identify and mitigate potential risks.



¹ Calculated as average across the reporting period in full-time equivalent. Variation in numbers throughout the year according to timing of maintenance shuts and harvesting season in forestry operations as well as closure of CAPEX projects.

Our supply chain

In 2022, our global supply chain included around 12,000 suppliers² in 67 countries worldwide. At Mondi, suppliers are defined as companies or persons manufacturing goods, trading with goods or rendering services, including suppliers of all materials and services, contractors, consultants, outsourcing services, distributors and business partners. In 2022, we procured €7.0 billion worth of goods and services from our suppliers. Products and services purchased locally represented 58% of our overall spend in 2022.

We operate a central procurement function in a number of key spend categories and manage the remainder regionally or locally. Our key areas of spend and major procurement categories are illustrated in Figure 2.

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 67.

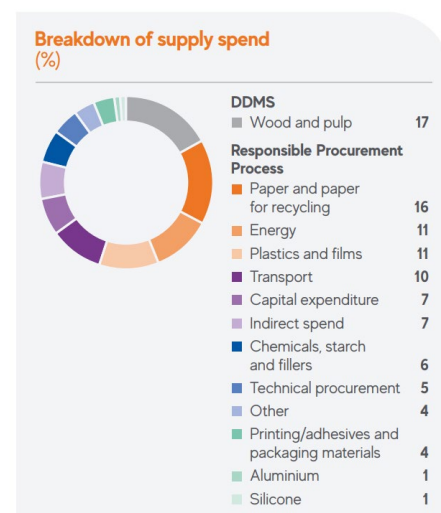


Figure 2 Breakdown of supply spend 2022

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. The Board delegates different areas of responsibility to specific committees. 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 the Mondi's Modern Slavery Act statement to the board for approval. In addition, it is responsible for the governance of matters related to the environment, climate change, labour, human rights, biodiversity, and product stewardship and enables alignment with best practice. More information about our sustainability governance can be found in our [Sustainable Development report](#) on page 85 - 87.

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 may 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 clearly where we stand on sustainable development. The SDMS include policies, operating standards and practices 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.

² Direct active suppliers to continuing operations grouped into single entities, excluding Personal Care Components suppliers.

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.

Mondi Group policies

Labour and Human Rights Policy	Defines our commitment to respecting internationally proclaimed 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	Defines the minimum standards for our suppliers for environmental, social and governance topics, and other legal and ethical issues.
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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 operations
Code of Business Ethics	Sets out the five fundamental ethical principles that govern the way in which Mondi and its employee 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 mentioned above.

In developing and reviewing our labour and human rights policies, which include modern slavery, 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. No changes to the related policies were made in 2022. An overview of the development of the policy can be found [in our previous statements](#).

Code of Conduct for Suppliers

Our [Code of Conduct for Suppliers](#) covers the following key focus areas for suppliers:

- Legal Compliance
- Product Safety, Environment and Climate
- Safety and Occupational Health
- Labour and Human Rights
- 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.

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 to all of our suppliers, and require them to demonstrate that they have in place the following processes to address human rights violations:

- Duly map human rights impacts whenever the need for such action is agreed
- Have in place adequate remedial mechanisms in case of any violations
- Notify Mondi immediately in writing if they become aware of any breaches

We expect our suppliers to be aware of all sites and companies involved in their production and supply network, and, upon request, to be able to 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, and subcontractors understand and comply with the requirements of our Code. We expect our suppliers to apply similar requirements for their own supply chain.

Non-compliance with our Code of Conduct for Suppliers is addressed as a clause in the Code. Actions we take include working with the supplier to implement appropriate corrective actions. We reserve the right to suspend sourcing from the supplier until we are satisfied with their performance. Suppliers who deviate persistently or significantly from these requirements will be excluded from business with Mondi.

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 programme. We believe this approach increases the effectiveness of our due diligence by virtue of a shared governance and policy structure.



Due diligence

Our Human Rights Due Diligence (HRDD) is a continuous management process that includes the integration of human rights considerations into our procedures 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.

From 2019-2021 we collaborated with the Danish Institute for Human Rights (DIHR) to support us in reviewing of our processes, policies and governance, grievance mechanism and other requirements. Details of the work done with DIHR are outlined in [previous statements](#), including the summary of the DIHR recommendations based on their detailed human rights risk and gap analysis. This external partnership provided the foundation for our Human Rights Due Diligence development. We continue to work with external human rights experts and have committed to being part of the Business & Human Rights Accelerator programme of UN Global Compact.

Our first human rights target for MAP2030 was achieved in 2021 with the development of our human rights' due diligence methodology. Our due diligence and risk assessment methodology helps operations identify, mitigate and remediate human rights risks within our business activities and business relationships.

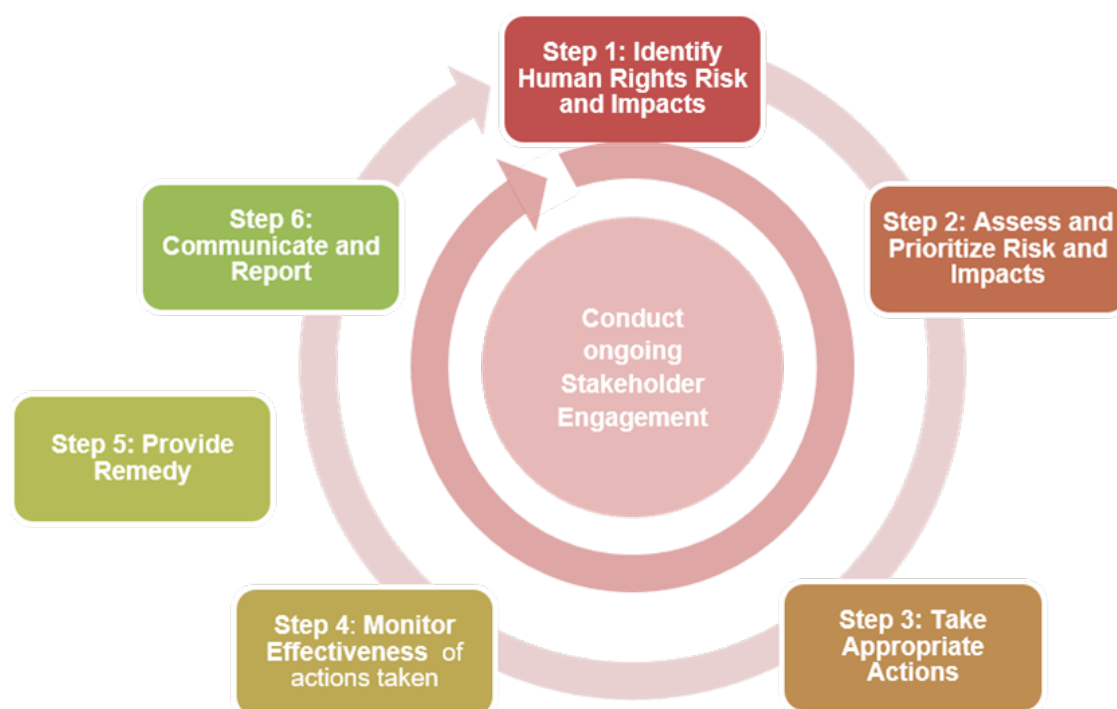


Figure 3 Steps of HRDD approach based on UNGPs

HRDD pilots within local operations

In 2022, we conducted two pilots based on our Human Rights Due Diligence (HRRR) methodology and guidance.

The local assessment teams in Mexico and Türkiye first sought to understand areas of risk and vulnerable groups within their operations by conducting stakeholder engagement sessions with individual rights holders, groups, and representatives. The findings were discussed and assessed with the support of human rights experts, applying the UN Guiding Principles framework.

Although no egregious human rights violations were identified, we discovered some areas for improvement, which included working hours, recommendations for safety improvements and equality. Action plans were developed with the management teams, including monitoring of their implementation. For example, the team in Mexico introduced various initiatives related to diversity and inclusion, such as the local language welcome messages, workshops for women empowerment and a sexual assault awareness campaign. In Türkiye the management is taking further actions to reduce overtime working hours and increase the number of permanent employees.

The local HRDD process and findings were documented and integrated into the continuous business management processes. The two pilot operations have clearly defined their action plans and are working on the identified measures. These pilots will also support the development of a roadmap for human rights due diligence and risk assessments across Mondi operations.



Due Diligence and Responsible Procurement

Our Responsible Procurement process applies a risk-based approach to assess suppliers against the requirements of our Code of Conduct for Suppliers. It is facilitated by the Group procurement function and aims to achieve a consistent process for selecting, evaluating, on-boarding and monitoring suppliers globally based on their sustainability risk and performance (see 'Risk assessment and management') along with other factors.

Our evaluation process for suppliers is detailed in our [previous statements](#), and the 2022 results are reported in the following section of this statement.

As we progress in assessing our suppliers, we will take relevant action on the overall findings, and will report on the results of the monitoring process, including on the work we may undertake with suppliers to improve performance and to address risk. This may include audits, site visits and collaboration on joint initiatives, or a decision to stop sourcing from certain suppliers.

Whistleblowing and grievance mechanisms

We provide robust internal processes and tools to facilitate the reporting, investigation, and resolution of grievances, including those related to potential human rights violations, including modern slavery and human trafficking. Our operations make formal grievance mechanisms such as SpeakOut available to the public. SpeakOut is the Group's confidential service platform, which is operated by an independent third party. The service is available for all colleagues, customers, partners, and other stakeholders to raise any concern relating to potential bribery, discrimination, fraud, corruption, environmental pollution, major safety and health violations, harassment, modern slavery, human trafficking or other significant topics.

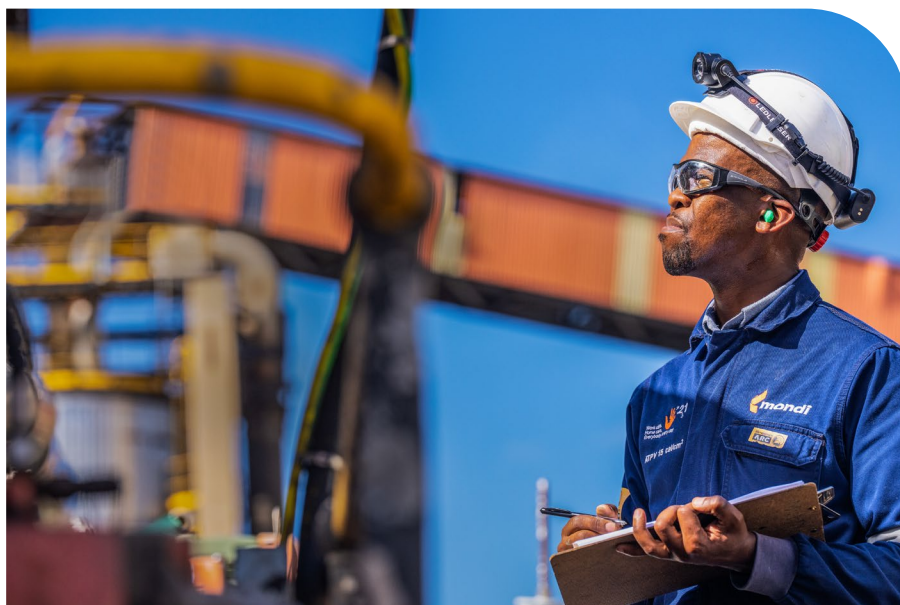
More information about the process of our SpeakOut grievance mechanism can be found in detail [in our previous statements](#).

The Internal Audit function is responsible for monitoring the SpeakOut process, overseen by the Audit Committee and the Board. Each Audit Committee and Board meeting includes a summary of reported issues, the status of unresolved items and actions taken in response to the allegations.

In 2022, we had 47 incidents, 45 from SpeakOut and 2 reported cases through other channels (2021: 39 individual incidents aggregated from a total of 61 cases reported, 34 incidents from SpeakOut and 5 from other channels). Overall, topics encompassed allegations concerning work-related harassment and unfair treatment, labour rights and health & safety matters. Appropriate responses and corrective action were taken on all issues (further details of cases are not disclosed due to confidentiality).

Incidents with potential human rights impacts related to the privacy of employees as well as unfair treatment at the workplace were immediately addressed, and measures were taken to address the incidents, ranging from official apologies, disciplinary measures, professional training for behavior and organisational change as well as counselling and support for rightsholders.

While we welcome the absence of reports pointing to modern slavery or human trafficking, we recognise that such risks may exist. We need 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.



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 sustainable development risk register annually to ensure mitigation plans are in place for those risks with a high likelihood of occurrence and/or impact potential.

Each of the Group's principal and emerging risks are reviewed in detail 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 level of internal and external assurance obtained, and the resultant 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 page 72 - 82.

In our own operations

Many existing assessments and procedures link to human rights issues, typically involving health and safety, labour law compliance, community impact assessment and environmental due diligence.

In 2022, we confirmed Mondi's priority human rights risk areas, taking into consideration any inherent geographical risks in our countries of operation incorporating various public indices, such as Global Slavery Index, Trafficking in Persons Report, International Trade Union Confederation (ITUC) Global Rights Index, Children's rights in the Workplace Index, as well as our business processes, industry risks and legislative requirements.

While we consider all human rights as important, we focus on the topics that are most significant for our operations. Our risk areas are fair working conditions, freedom of association and collective bargaining, indigenous and land rights, modern slavery, child labour, and safeguarding our environment. More information about our human rights risk areas can be found in our [Sustainable Development report](#) on page 71 - 73.

Together with external human rights experts and a Mondi cross-functional team, we have established a risk-based approach and risk identification process that considers the local context, prior incidents as well as established practices. Modern slavery is a dedicated focus area in the assessment looking specifically at procedures implemented to address the risk of modern slavery in the operation and identifying and mitigating risks of exposure to modern slavery for external workers.

In 2023, we will conduct risk-identification exercises across all operations. The findings will be evaluated and consolidated, to help us to better understand our overall risk areas. This baseline of risk areas and processes sets the foundation for assessing priorities and developing our action plan and roadmap for human rights due diligence within our operations.

We continuously review our operational impacts through regular engagement with our stakeholders. This includes working with external human rights experts and engaging with our partners across the value chain and people in the communities where we operate.



In our supply chain

As part of our Responsible Procurement programme, we have developed a comprehensive methodology for assessing sustainability risks in our supplier base – including labour rights and modern slavery. To identify key risks, we have incorporated various public databases/tools, such as the Global Slavery Index, Global Rights Index (International Trade Union Confederation) and World Bank Governance Indicators, into our processes to help us identify specific risks of the country of production or nature of the industry related to modern slavery and human trafficking. 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 criteria applied for assessing high-risk suppliers and steps of (de-)escalation.



Since the launch of the Responsible Procurement process in 2019, we have assessed over 7,000 supplier sites, as of year-end 2022, representing approximately 78% of our total spend.

In 2022, the risk assessment focused on newly on-boarded and reactivated suppliers, based on criteria related to spend and the critical nature of materials or services purchased. The risk screening includes environmental criteria (climate, resources, and biodiversity risks) and social criteria (human rights and labour practices).

369 supplier sites were screened with 40 supplier sites considered potential high-risk and consequently requested to complete a questionnaire. We assessed these completed questionnaires from potential high-risk suppliers and our sustainability specialists conducted follow-up evaluations. Following these efforts, one supplier site (0.3%) remained classified as potential high risk (2021: 0.1%) and one supplier site (0.3%) did not complete the questionnaire (2021: 2.3%). Escalation procedures are being carried out with these suppliers.

The slight increase in our supplier-risk ratio can be attributed to the smaller sample of suppliers screened in 2022 as our primary focus was on developing our long-term strategic approach to responsible procurement including the evaluation of external sustainability risk rating tools.

We will pilot an external sustainability risk assessment and rating tool in 2023 to support us to scale the process across our supplier base. The complexity, scale, diversity and global nature of our supply chain means achieving transparency at scale will take time. We are committed to keep working to develop a scalable process for assessing the risk related to our suppliers and to create greater transparency of the sustainability performance of our supply chain.

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 provide 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.

In 2022, we conducted training on human rights and modern slavery, including various live webinars, two on-demand e-learning courses, five workshops with external experts and five internal training sessions across Mondi to raise awareness of human rights risks and where they might occur, as well as the action needed to address them. This year's special focus was on the roll-out of the Human Rights Operating Standard and Human Rights Due Diligence Practice Note. Dedicated training sessions were provided to Human Resource Country Managers and Managing Directors. Business management meetings included awareness raising for risk areas, policies and introduction of the HRDD process and next steps in risk identification and assessment. We recorded over 270 hours of training in this respect and the two online training courses are available for all Mondi employees on demand, integrated into our digital Learning Management System.

To reach our target of 100% of operations with a completed human rights due diligence and risk assessment in place by 2025, we are developing a roadmap for building the required competencies across our businesses. This will include 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 the provision of training for our suppliers on our approach and on addressing risks, including modern slavery and human trafficking, will be important to secure the integrity of our supply chain.

Evaluating the effectiveness of our approach

The Executive Committee and the Board's 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, during 2022. The Board's SD committee approved Mondi's UK Modern Slavery Act statement 2022.

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.

Approach	Development	Progress 2022	Next steps
<p>Policy & Governance</p> <p>Commitment to strengthen governance systems to prevent human rights violations and remedy any adverse impacts</p>	<p>Annual review to strengthen response to modern slavery risks including external review and recommendations by DIHR</p>	<p>Roll out of Operating Standard and Practice Note supporting operations to implement the Group Labour and Human Rights policy</p>	<p>Integration of all human rights-related learnings and findings into our continuous management processes, so that they are considered in all our actions and decisions.</p>
<p>Due Diligence</p> <p>Targets to have Human Rights Due Diligence in all operations by 2025 and all impacts addressed by 2030</p>	<p>Human Rights Due Diligence (HRDD) and risk assessment methodology and guidance developed</p>	<p>Completed pilots for the HRDD approach in two operations and identified human rights focus topics for Mondi Group for continuing with a risk-based approach for the due diligence roadmap</p>	<p>Conducting risk-identification exercises in all our operations. Findings will help us to better understand overall risk areas and to form baseline for actions and initiatives</p>
<p>Supplier Risk assessment</p> <p>Commitment to mitigate risks and create greater transparency in our supply chains through our responsible procurement process</p>	<p>Over the last three years we have successfully screened over 7,000 suppliers through our Responsible Procurement process</p>	<p>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.</p>	<p>Implement a sustainability risk assessment- and rating tool to improve transparency in our supply chain and mitigate risks</p>
<p>Grievance Reporting</p> <p>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.</p>	<p>We have developed processes and tools to facilitate the reporting, investigation and resolution of grievances. SpeakOut is made available to all stakeholders.</p>	<p>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.</p>	<p>Continue efforts facilitate the reporting, investigation and resolution of grievances through SpeakOut</p>
<p>Training</p> <p>Working with external experts and internal training sessions to raise awareness of human rights risks</p>	<p>We have undertaken training of different employee groups since the introduction of the UK Modern Slavery Act, including senior management.</p>	<p>In 2022, we recorded 270 hours of training on human rights policies and procedures and awareness raising for human rights and modern slavery</p>	<p>Conduct further training and awareness raising to improve our understanding of how Mondi's business activities and relationships potentially impact human rights.</p>

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.

Closing message

This statement is made on behalf of those legal entities within the Mondi Group that had a turnover exceeding £36 million during 2022 and had directly or indirectly provided goods or services to the UK in 2022. 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
3 May 2023



Appendix 1

Obligated companies by the UK Modern Slavery Act for the 2022 financial cycle

Corporate:

Mondi AG
Mondi Paper Sales GmbH

Uncoated Fine Paper:

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

Corrugated Packaging

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