

California Transparency in Supply Chains Act Statement

Mondi has a clear commitment to respecting human rights in our operations and across our supply chain. We are proactively working to identify and manage potential risks as we introduce our human rights due diligence approach across the business which is embedded in our relevant practices and policies. This includes our Labour and Human Rights Policy, Supply Chain and Responsible Procurement Policy, Communities Policy, Code of Conduct for Suppliers and Business Integrity Policy.

More information about Mondi's approach to human rights can be found in our annual Sustainable Development Report and Human Trafficking and Modern Slavery Statement on our website www.mondigroup.com

In accordance with the California Transparency in Supply Chains Act of 2010, Mondi makes the following disclosure:

1. Verification of product supply chains

As part of our Responsible Procurement process (as further described in our Sustainable Development Report), we are addressing human trafficking and slavery risks in our supply chain. We apply a risk-based approach and work with a trusted third-party sustainability risk rating provider to assess suppliers against our [Code of Conduct for Suppliers](#) ("Code of Conduct"). Our Code of Conduct defines the minimum standards for our suppliers on labour and human rights issues, including human trafficking and slavery in its Appendix 4.

An initial supplier screening indicates the risk in four areas including labour and human rights. Potential high-risk suppliers undertake individual performance assessments and are evaluated independently against international standards and global best practice. We work collaboratively on corrective action plans and define further steps if required. These steps include supplier meetings, audits and as a last resort, termination of the supplier relationship.

2. Audits of suppliers

Mondi reserves the right to undertake on-site audits at its suppliers, this may be required if, for example, as part of the Responsible Procurement process a potential high-risk supplier's compliance with Mondi's Code of Conduct cannot be evaluated if the supplier is non-responsive, has declined the sustainability assessment or if the agreed corrective action plan has not been implemented. These audits are currently performed by Mondi internal experts. Mondi has currently not implemented a specific audit programme for evaluating compliance with human trafficking and slavery.

3. Direct supplier certificates of compliance

Mondi's Code of Conduct is an integral part of the procurement process. It requires suppliers to comply with all applicable laws which includes laws regarding slavery and human trafficking, in particular but not limited to, those that are in force in the countries where they operate and those that are in force in the country where the products will be delivered and/or services will be provided.

4. Internal accountability standards and procedures

In case of an employee's or supplier's suspected violation of Mondy's human rights standards, the consequences depend on the nature, circumstances and context of non-compliance. Appropriate responses and corrective actions are taken on all incidents raised and may include the right to suspend sourcing from the suppliers until Mondy is satisfied with their performance; increased reporting obligations and verification through audits for suppliers; termination of the supplier contract/business relationship in case of failure to take effective corrective or remedial action; additional education or disciplinary measures up to termination for an employee.

5. Training on human trafficking and slavery risk mitigation

Training is an important component of our approach to addressing potential modern slavery and human trafficking risks. Mondy provides all our employees with access to training on human rights and modern slavery, including live webinars and on-demand e-learning courses about our approach to human rights. Mondy conducts workshops and training sessions including external experts for relevant employees and management, such as global procurement, safety and human resources functions to raise awareness of human rights risks (including human trafficking and slavery) as well as the actions needed to prevent and mitigate.