

# Modern slavery act 2015 transparency statement

FY 2022



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## 1. INTRODUCTION

This statement is made pursuant to the Modern Slavery Act 2015 („MSA“) for the financial year ending 31 December 2022 by Greiner AG on behalf of the companies within its group of companies which are required to publish an annual statement.

Greiner AG is committed to ensuring that the business and supply chains of the Greiner companies are free from any forms of modern slavery and human trafficking.

To date, Greiner has established the Greiner-wide Greiner Compliance Management system, as certified by Austrian Standards (ISO 37301) for all entities worldwide, which assists in ensuring that our colleagues and business partners – such as our suppliers and customers – comply with the Greiner Code of Conduct.

Section 54 of the MSA places a legal requirement on large businesses such as some entities within Greiner to publish an annual statement of the steps that the organisation has taken during the previous financial year (FY 2022) to ensure that modern slavery (including human trafficking) is not taking place in the business or supply chain of Greiner.

## 2. ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

### 2.1. Our organisation

Greiner is a family-owned, unlisted stock corporation and one of the world's leading suppliers of plastic and foam solutions. The company is based in Kremsmünster (Austria). Our three operating divisions (Greiner Packaging, NEVEON and Greiner Bio-One) produce and market innovative solutions for a wide range of industries and sectors under the umbrella of Greiner AG. Most of our customers are in the packaging, furniture, sports and automotive industries, as well as the medical technology and life science sectors. Currently, Greiner offers secure jobs to more than 11,600 people in over 30 countries. In fiscal year 2022, Greiner generated an annual turnover of over EUR 2 billion.

**Greiner AG** is the parent company to its three divisional holding companies, namely, Greiner Packaging International GmbH (Greiner Packaging), Greiner Bio-One International GmbH (Greiner Bio-One) and NEVEON Holding GmbH (NEVEON) and some subsidiaries of these holding companies are required to produce an annual statement which is publicly available at [www.greiner.com](http://www.greiner.com).

**Greiner Packaging**, manufactures innovative and sustainable plastic packaging for customers around the world. The division's solutions protect a wide range of products in the food and non-food sectors – from yogurt to detergent. Greiner Packaging has two business units – Packaging and Assistec. The Packaging business unit produces cup packaging and packaging solutions, while Assistec manufactures custom-made technical plastic parts and complete plastic assemblies. The division has a presence in 30 locations across 19 countries.

**Greiner Bio-One**, develops and manufactures high-quality products for medical and laboratory applications, with a focus on single use plastic products for in-vitro diagnostics, biotechnology and diagnostic and pharmaceutical industries. The company serves as a technology partner for hospitals, laboratories, universities, research institutions and customers in the diagnostic, pharmaceutical and biotech fields. Greiner Bio-One consists of three business units – Preanalytics, BioScience and Mediscan – and has 29 locations in 22 countries.

**NEVEON**, is a leading expert in foam solutions for polyurethane soft and composite foams for a wide range of applications. The division has operations in 57 locations spread over 17 countries and brings together all of the company's foam competencies in its three business units: Living & Care (mattresses, padded furniture and medical applications), Mobility (automotive, aviation, railway and maritime) and Specialties (boiler insulation, acoustic solutions, filter foams, sport applications, specialized packaging and special applications).

## 2.2. Our supply chains

For us, responsibility starts outside the company gates. We have built up a network of high-performance suppliers over decades – in Europe and around the world. We have defined rigorous guidelines, so that our partners are aware of the high expectations we have when it comes to our products and our collaboration. We regularly discuss the standards we expect from our suppliers in our everyday business and ensure that the supply chain meets sustainable manufacturing criteria from the beginning.

Greiner operates about 120 sites (including manufacturing sites) in over 30 countries, some of which are considered to present a high-risk in terms of the likelihood of engaging workers in modern slavery and human trafficking. We procure goods, components, raw materials, and services from a large number of suppliers based in a variety of countries, some of which operate in high-risk countries, such as: India, China, Pakistan, Bangladesh, Russia, Indonesia, Egypt, Myanmar, Iran, Turkey and Thailand. We also have agents, distributors, and joint ventures, some of which operate in these high-risk countries. We are aware of the problems associated with this and are making every effort to reduce the potential adverse impacts. In addition to external supplier assessments, such as EcoVadis, we also rely on audits to verify compliance with our guidelines.

Many of the relationships we have with suppliers are direct and the nature of the goods and/or services they supply are critical to our commercial operations. To mitigate the potential effects of a business-critical supplier being found to engage in modern slavery and human trafficking, we use multiple suppliers for key raw materials, so that we can terminate our arrangements with any suppliers who are found to be carrying out such activities and not willing to improve.

We outsource some of our IT, logistics, engineering, facility management and staff leasing services and subcontract some of our support and maintenance services in respect of certain products to a number of providers in various countries. These countries are considered to be low risk regarding the likelihood of engaging workers in modern slavery.

## 3. GOVERNANCE

The guidelines and expectations for our employees and business partners are clearly defined in Greiner's Code of Conduct as well as the Code of Conduct for Suppliers and Business Partners, which outline our expectations for them to act in a lawful, integrity-based and sustainable manner. We believe that our commitment to good corporate governance is reflected in our corporate culture, which incorporates a focus on integrity to strengthen the trust that the stakeholders have in our company. We want to be recognised as a responsible partner and industry role model. In order to achieve this, we relentlessly implement and apply our standards and values in our daily business, both internally and externally.

Our sustainability management and forward-looking approach to risk management are also essential to achieving and maintaining a long-term and sustainable increase in our value as a company.

### 3.1. Clear values & principles

At Greiner, we live by clearly defined values. These values must meet the highest moral and ethical standards because they affect how we work on the inside and on the outside. Our values shape us a company and provides every individual with a firm foundation and framework to work together. Our values have a significant impact on our culture and sets us apart as a company.

Greiner has four binding values for all employees that guide everything we do: openness, appreciation, reliability and striving for excellence:

#### An overview of our values and principles

##### Openness

- We bring forward people's own ideas, in our and in other divisions.
- We support measures although they are more advantageous for the Group than for our own division.
- We also provide critical feedback when things go wrong.
- We give our employees feedback. This lets them know where they stand and how they are being seen.
- We try new approaches.
- We don't say, "That's how we've always done it."
- We don't assume that what worked yesterday will still work tomorrow.
- We appreciate others' suggestions, even when they affect our sphere.

##### Striving for excellence

- We set ourselves high goals which are not easy to achieve.
- We try to meet external/internal customers' wishes as well as possible.
- We analyze mistakes we have made and try to learn from these.
- We celebrate goals we achieve.
- We stand for profitable growth.
- We fight for every customer.
- We set ourselves benchmarks and work to exceed these.
- We don't just measure ourselves against yesterday's success, but against the competition as well.
- We know how to celebrate successes.

##### Reliability

- We keep our promises
- We make consistent decisions in similar situations
- We check our performance on a regular basis
- We remain loyal to our company
- We represent the company in public life
- If we can't keep a promise, we communicate this as well
- We also place equal value on social, ecological, and economic factors within company management

##### Appreciation

- We listen to others and let each other speak.
- We consider the opinion of others to be equitable.
- We actively ask for opinions.
- We try to combine the best of different cultures.
- We see the cooperation of young and old as an opportunity.
- We see cultural differences as a learning opportunity.
- We consider all employees as equals.
- We don't put ourselves above colleagues or employees.
- We are courteous in our interactions with one another.
- We tolerate other opinions.

### *Freedom of association, dialogue and employee participation*

Dialogue and employee participation are important tools that strengthen employee loyalty in the long run. They are also effective in helping us to meet the needs of stakeholders. In our company, we make sure that information is exchanged about a variety of topics and at various levels. The formats that we regularly communicate include employee appraisals, employee surveys, regional committees, and cooperating in voluntary initiatives and interest groups. In addition, we comply with all regulatory requirements that serve to represent employees' interests and give them their say, such as the possibility to elect work councils or the right to freedom of assembly and association. In many companies of the Greiner Group, the interests of the employees are represented by a works council or a company union, which operate in accordance with national laws and regulations.

### *Fair pay and collective bargaining agreements*

As a family-owned company steeped in tradition, Greiner supports remuneration for all employees that is in line with the market. The wages paid are based on the standard market remuneration for a comparable position in the relevant field. This includes the application of collective bargaining agreements: In 2022, 54 percent of our employees worldwide were covered by a general and/or collective bargaining agreement (2021: 51 percent). In addition, there are variable compensation components that relate to individually agreed targets. The principles of bonus compensation are regulated at divisional or site level and apply to employees above a certain grade. For employees who are not covered by this regulation, local bonus regulations and incentive systems apply, which vary according to country, field of work, and position.

## 3.2. Our commitment

### *Member of the UN Global Compact Network and UNGC*

As a company, we have been contributing to sustainable development for more than 150 years through our commitment to transparent and ethical behaviour. To pin down this commitment and make it transparent, we joined the UN Global Compact (UNGC) in 2020, the world's largest and most significant initiative for responsible corporate governance. As a signatory to the UN Global Compact, we are committed to its ten principles related to human rights, labour standards, environmental protection and anti-corruption. All the principles are based on key United Nations (UN) conventions and all signatory companies are expected to implement the ten principles within their sphere of influence. We at Greiner have set out on this journey. Our annual and sustainability report 2022 serves as a Communication on Progress for 2022 (CoP) on our implementation of the Global Compact's principles and provides an overview of where we currently stand. The report is publicly available on our website: [www.greiner.com](http://www.greiner.com).

### *Contributing to the Sustainable Development Goals (SDGs)*

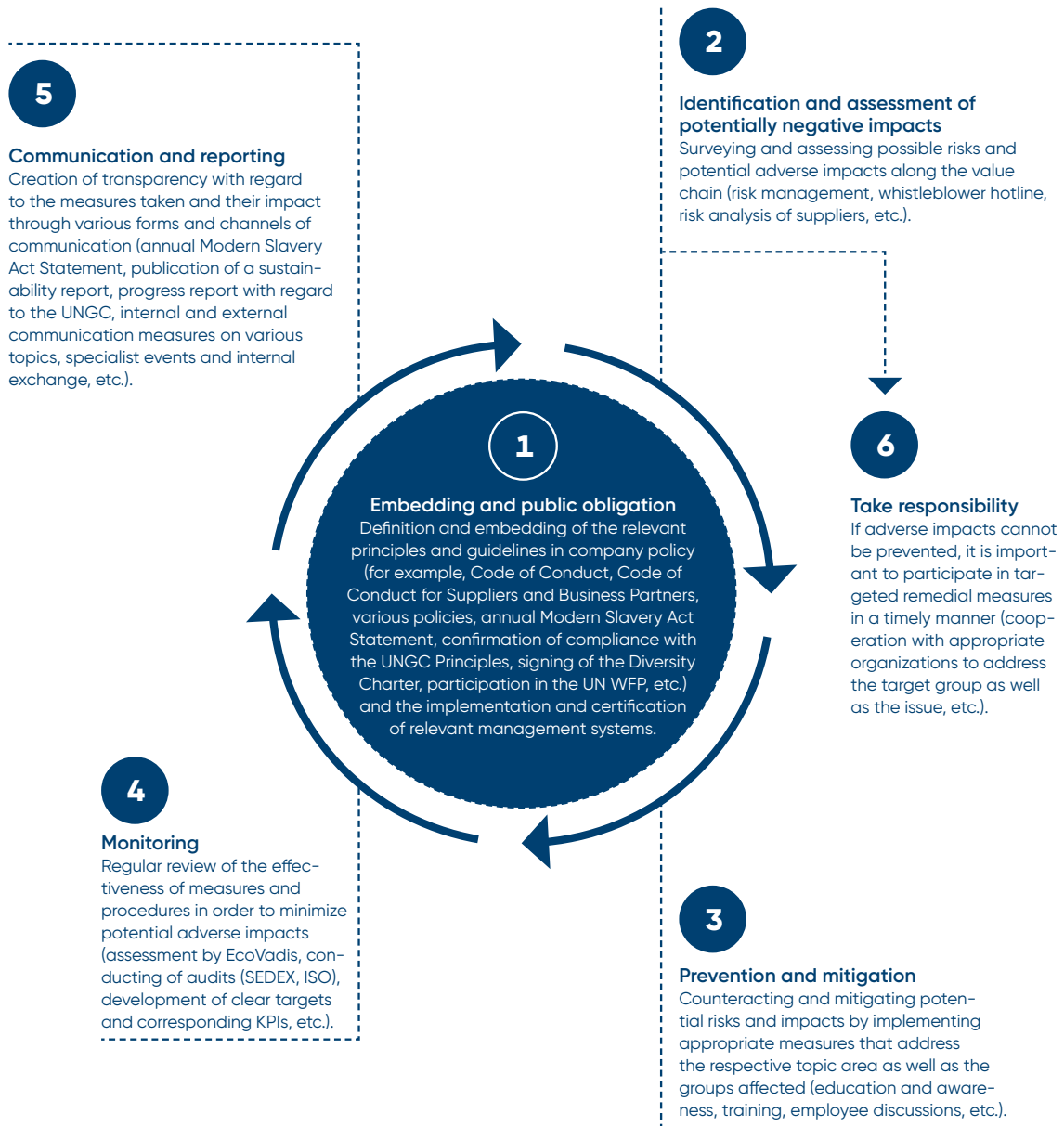
The 17 Sustainable Development Goals (SDGs) and their 169 sub-goals guide the efforts and shape the responsibilities of governments, businesses, cities and civil societies worldwide. They were adopted by the 193 member states of the United Nations (UN) in September 2015 and define the economic, social and environmental dimensions of sustainable development. At Greiner, we support the implementation of the SDGs and want our business activities to make a significant contribution to achieving the goals. Our material analysis assessed our contribution to the SDGs across the entire value chain. The analysis revealed that we make a particularly relevant contribution to four goals: SDGs 8, 12, 13 and 14.

## 3.3. Corporate Due Diligence

Compliance with social standards and human rights is a top priority for us and is ensured through a wide range of measures. In cooperation with our suppliers and business partners, we make sure that our actions are in accordance with the UN Guiding Principles on Business and Human Rights and the Core Labour Standards as set out by the International Labour Organization (ILO), and in strict compliance with local laws.

Our company is opposed to child and forced labour without exceptions. Greiner supports fair pay, as well as freedom of assembly and expression. Discrimination, harassment, and breaches of our company policies are not tolerated. In order to comply with these principles, we rely on education, regular training, and offer a whistle-blower platform. The whistle-blower platform is open for all employees to report incidents of discrimination and/or human rights violations. Our measures also include applying corporate due diligence according to the OECD Due Diligence Guidance for Responsible Business Conduct.

The OECD Due Diligence Guidance consists of the following six steps:



### 3.4. Whistleblowing system

Greiner integrated a whistleblowing system, [tell-greiner.com](https://tell-greiner.com), accessible via the internet, which enables our employees, business partners, customers and other stakeholders to report incidents of discrimination and/or human rights violations. The whistleblowing system is open to all employees but also external stakeholders and reports can be submitted identified or anonymously.

In the [tell-greiner.com](https://tell-greiner.com) policy, stakeholders can find all they need to know about the reporting system, such as what can be reported, how the information is dealt with and how we ensure anonymity and confidentiality. Click [here](#) to access the whistleblowing portal.

## 4. OUR POLICIES

### 4.1. Code of Conduct & Code of Conduct for Suppliers and Business partners

As part of Greiner's commitment to ensure that our business and supply chain are free of modern slavery and human trafficking, we have implemented the Greiner Code of Conduct and Greiner Code of Conduct for Suppliers and Business Partners. Everyone who works for and in cooperation with Greiner is obliged to sign a declaration, confirming that they will comply with the Greiner Code of Conduct.

The senior manager with overall responsibility for the Code of Conduct is the Greiner Group Compliance Officer of Greiner AG. Implementation and management of day-to-day operations of the policies related to the Code of Conduct are carried out by the Greiner Group Compliance Officer of Greiner AG, the Division Compliance Officers of Greiner Bio-One, NEVEON and Greiner Packaging as well as the Local Compliance Officers of each Greiner location.

Our first-tier suppliers are required to:

- accept contractual obligations to comply with Greiner Code of Conduct for Suppliers and Business Partners or to adhere to their own code of conduct, which must hold them to the same principles as covered by Greiner Code of Conduct for Suppliers and Business Partners; and
- oblige suppliers who supply them with goods and/or services to also be bound by the same code of conduct or equivalent set of principles.

The responsibility for assurance that our suppliers comply with Greiner Code of Conduct for Suppliers and Business Partners lay with Head of Purchasing of each Greiner division.

Greiner strives to embed respect for human rights and taking a zero-tolerance approach to modern slavery, by requiring all employees to sign Greiner Code of Conduct. Compliance relevant colleagues are also required to undertake training and successfully complete a test on the principles of the Code of Conduct.

### 4.2. Compliance Policies

Based on the principles of the Code of Conduct, we have also introduced Greiner Compliance Policies. Not only do we want to demonstrate our commitment to operating within the boundaries of the law, but also to promote ethical behaviour and to contribute to building and maintaining trust among various stakeholders.

The Greiner Compliance Policies help navigate the complexities of different legal systems, cultural norms, and business practices across various jurisdictions.

These Compliance Policies are in force and apply to all Greiner employees:

- Anti-Corruption Policy
- Legal Policy
- Military & Dual Usage Policy
- Key Positions Policy
- Business Partner Policy
- Antitrust Law Policy
- Data Privacy Policy
- [tell-greiner.com](https://www.greiner.com) Policy
- Policy on Measures to Take in the Event of Violations
- M & A Competition Law Policy
- M & A Practice Guide

### 4.3. Sustainable Sourcing Policy

Along with Greiner Code of Conducts, the group-wide Sustainable Sourcing Policy in place has been revised and updated in 2022 and will be rolled out in 2023. Among numerous, the main objectives of the Sourcing Policy are to ensure that all suppliers employ sustainable business practices and that all our employees apply sustainability principles when purchasing goods and services. The policy brings together social, ethical, environmental, and economic aspects; it lists minimum requirements towards suppliers; and presents escalation process in case of non-compliance. Our Environmental Policy also refers to our Code of Conduct for Suppliers and Business Partners and our Sustainable Sourcing Policy.

## 5. TRAINING

Especially in a company operating around the globe, uniform training with uniform content is an essential tool to maintain compliance within the organization. These trainings are arranged centrally, across all organizational locations.

Our colleagues working in responsible management positions and/or dealing with customers, suppliers, competitors or authorities, in particular CEOs and colleagues in sales and procurement, are deemed responsible for complying with the Greiner Code of Conduct, all of the Greiner Policies and other laws and regulations. They are obligated to undertake mandatory training on these principles. These training courses are repeated after one year.

Such colleagues are also required to undertake a test after the training, achieving a score of 80% or higher. Where this score is not attained, the relevant colleagues are required to re-sit the test until the requisite score is achieved. In total, the quota of trained employees of the group, each division and each company has to be above 90% at all times. Our training quota is constantly reviewed by the Compliance Officers and discussed at least biannually by our Compliance Board.

Compliance-relevant employees also attend an in-person classroom compliance workshop. Not only do we train employees in Compliance relevant topics, but we also show presence as a compliance department – especially in our companies located abroad. Furthermore, the topic of compliance should be given a face. At the same time, it is necessary to ensure that the implementation of the CMS elements in the local branch offices is carried out according to all the requirements.

As the organization of the workshops is characterized by the idea of a company-wide uniformity in the training program, the same content is presented in all countries and in all branches. The workshop provides employees with a basic introduction to the topic of compliance. Through an explanation of the legal risk situation, the aim is to create awareness and an understanding of importance regarding the individual employee and the company as a whole. The classroom workshops are refreshed at regular intervals, at the latest after 3 years.

Additionally, we will introduce a new e-learning module, to further raise awareness and train our buyers in the future. We want to anchor sustainable procurement firmly in the company and therefore developed an e-learning course on sustainable procurement. The course consists of eight modules, some of them aiming at all Greiner employees. The e-learning course is scheduled to be rolled out in 2023.

## 6. RISK MONITORING AND COMPLIANCE

As a global player in the plastics and foam sector, it essential for us to operate in a manner that is legally compliant and in line with our values. This commitment is the foundation of our corporate governance approach and our culture. It includes protecting human rights, complying with laws and ethical principles, fighting corruption and promoting transparency and accountability.

To evidence our commitment, we had all Greiner companies ISO 19600 and ONR 192050 certified in 2020. ISO 19600 is an international standard that establishes requirements for the implementation of compliance management systems. In 2021, the underlying standard was changed to ISO 37301. This change resulted in additional improvements to our compliance management system, which allows us to detect, understand and proactively minimize the risks of non-compliant behaviour and respond appropriately to any violations.



Responsibilities, internal processes and regular risk analyses are described in a comprehensive compliance manual. The compliance risk analysis, first performed in 2016, is reviewed on a regular basis and revised as necessary. Any potential changes to how risks are prioritized are taken into account when making adjustments to the compliance management system.

Each Greiner company has a Local Compliance Officer, each division has a Division Compliance Officer, and the company as a whole has a Group Compliance Officer. Regular trainings are provided to employees in compliance-related roles. An introduction to compliance is an integral part of the onboarding process for new compliance-relevant hires. The Supervisory Board is informed about the compliance management system by the Group Compliance Officer in regular reports, including biannual CMS reports, annual certification reports, and ongoing updates from internal audit and risk management teams.

We use trainings, other tools and processes to ensure that we comply with all statutory and internal regulations. To achieve this, we implemented a risk management system in line with the precautionary principle in 2016. This system records, analyses and evaluates relevant risks at regular intervals. In 2023, risk management will be broadened in scope to incorporate ESG risks. We consider all relevant activities and developments across our entire value chain, from the supply chain through to production, waste disposal and recycling. To achieve this, Greiner uses an internationally recognized four-step risk management process.

Four-step risk management process:



As part of our initiative to identify and address risks of modern slavery and human trafficking in our supply chain most Greiner entities:

- Operate on the Greiner Compliance Management system, as certified by Austrian standards according to ISO 37301 (Fair Business Compliance Certificate), which assists us in ensuring that our colleagues, business partners and customers comply with the Greiner Code of Conduct, internal policies and other laws and regulations;
- Have a membership with a collaborative platform (currently EcoVadis) providing sustainability ratings for suppliers. The objective of the Corporate Social Responsibility (CSR) rating methodology is to assess the quality of the CSR management systems. The assessment of the CSR practices is performed by sustainable development experts of this platform provider. The goal of the analysis is to assess the elements of the CSR management system. Scorecards are used to rate and monitor the environmental, ethical, and social practices of the members;
- Carry out audits on first-tier and second-tier suppliers, as appropriate. Audit trails allow for the relevant Greiner entity to identify which suppliers have been audited and whether it was pre-arranged or unannounced;
- Periodically review our supplier relationships, usually between every 3 to 5 years depending on the nature of the arrangement and/or supplier;
- Engage independent experts to carry out investigations on our suppliers, where appropriate. Suppliers in China are regularly inspected by a public labour authority;
- Undertake documented risk identification, management and reporting processes;
- Monitor and evaluate risks on an ongoing basis, assessing their probability of occurrence and likely level of impact, which will determine the nature of action taken;
- Carry out risk impact assessments, which are documented in reports and reviewed periodically, usually annually, by the relevant Greiner entity, to then update relevant risk management processes;
- Our business partners, including agents, consultants and sponsored persons, are bound by additional contractual obligations which require them to maintain full written records of their business activities, which must be provided to the relevant holding company or subsidiary of Greiner on demand, in addition to supporting the relevant Greiner entity with any questions and/or demands it may have;
- Reserve the right to terminate all agreements with a supplier with immediate effect where that supplier is found to be in breach of its duties to comply with all applicable laws, including those which prohibit slavery and forced labour;
- Only engage workers from reputable employment agencies and always obtain relevant certification before accepting a worker;
- Require suppliers and business partners to work to minimum labour standards by expecting them to pursue fair remuneration policies and in the absence of legal and/or collective bargaining regulations, pay wages based on industry-specific remuneration and benefits which are typical for the relevant industries and locations in which the relevant parties operate;
- Require suppliers and business partners to ensure that appropriate standards of living are provided for their employees and families;
- Encourage openness and support. Anyone can raise genuine concern in good faith under our [tell-greiner.com](mailto:tell-greiner.com) whistleblowing system. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains;

## 7. NEXT STEPS

Following a review of the effectiveness of the steps we have taken to date to ensure that there is no slavery or human trafficking in our business or supply chains, we intend to take the following further steps to combat modern slavery and human trafficking:

- Deepening supplier assessment in all Greiner divisions to ensure proper risk mapping and evaluation. Set supplier performance improvement KPIs to track progress. Collaborate with suppliers on their corrective actions plan.
- Introduce and roll out an internal Sustainable sourcing training for all sourcing relevant employees.
- Conception and implementation of a group-wide training on Modern Slavery
- Drafting and publication of a group-wide Human Rights and People Policy
- Drafting and publication of a group-wide Diversity, Equity, and Inclusion Policy
- Appointment of a Group-wide Diversity, Equity and Inclusion Manager and Human Rights Officer to discuss the importance of the topic, but also to overview and ensure that all criteria established by Greiner are implemented in future actions



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