

Modern Slavery Statement

Modern slavery can be defined as a situation in which an individual is exploited by others for personal or commercial gain. Individuals lose their freedom by being tricked, coerced, or forced, and are thus unable to extricate themselves from the situation.

Our Commitment

Sustana will not tolerate the use of any form of forced labour, nor will Sustana tolerate the exploitation of children or the use of child labour. This applies to any of Sustana's facilities and suppliers worldwide. We are committed to preventing and reducing the risk of both forced labour and child labour being utilized in our facilities or in our supply chain.

Sustana is signatory to the [United Nations Global Compact](#) (UNGC) and supports its Ten Principles, including those on protecting human rights, eliminating all forms of forced and compulsory labour, and abolishing child labour.

Sustana also recognizes, and its policies and actions are informed by, the following:

- United Nations (UN) Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- International Labour Organization (ILO) Declaration of Fundamental Principles and Rights at Work
- ILO Forced Labour Convention, 1930
- Organization for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises and Due Diligence Guidance on Responsible Business Conduct
- UN Transforming Our World: the 2030 Agenda for Sustainable Development and its 17 Sustainable Development Goals (SDGs) and related targets, including:
 - SDG5 5.2 *Eliminate all forms of violence against all women and girls in public and private spheres, including trafficking and sexual and other types of exploitation.*
 - SDG8 8.7 *Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour.*

Our Company

Sustana is an industry-leading producer of quality fiber-based products and services, built on a solid commitment to sustainability and continuous improvement. From recovery to fiber to paper production, we produce the clean materials used in coffee cups, food packaging, books, and so much more. We work with leading brands, corporations, and customers to create



environmentally friendly, sustainable solutions for their packaging and printed material needs and utilize recycled material to create high-quality, low carbon products. Our facilities, operations, and personnel, as well as the majority of our customers and suppliers, are located in the United States and Canada.

Regulatory Compliance

Since 2024, in accordance with the [Canadian Fighting Against Forced Labour in Supply Chains Act](#), Sustana publishes a report on the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods. The report is available on [our website](#).

Sustana is **not** subject to the following regulations on modern slavery:

- California Transparency in Supply Chains Act
- UK Modern Slavery Act
- Australia Modern Slavery Act

Governance

Sustana is committed to integrating human rights considerations, including modern slavery, throughout our governance structures, policies, operations, and risk management frameworks. Responsibility for oversight of risks and actions pertaining to modern slavery primarily rests with the Board and Senior Management ESG Committees. The Board Audit and the Senior Management Enterprise Risk Management (ERM) Committees also have oversight of risks, opportunities, and external disclosures deemed financially material. Furthermore, individual risk oversight may be delegated to representatives of various business units and functions within the ESG Technical Working Group, including Human Resources, Operations, and Procurement and Supply Chain Management.

Policies

Sustana has integrated human rights considerations throughout its corporate level policies to prevent, and manage risks related to, modern slavery across its value chain.

- **Sustainable Procurement Policy:** This policy expresses our commitment to protecting human rights, including the prevention of child or forced labour, and states our requirements for suppliers and other partners to abide by these commitments. It describes our Sustainable Procurement and Supply Chain program and activities on training, adherence to our Supplier Code of Conduct, requirements for certification, and risk management.

- **Anti-corruption and Whistleblower Policy:** *“Corruption is an underlying cause of and a facilitating tool for practices arising from contemporary forms of slavery.”*¹ Our policy states our zero-tolerance for corruption and retaliation against whistleblowers for reporting instances of corruption. It also details the process and media for reporting instances and codifies our protection of whistle blowers.

Employee and Supplier Codes of Conduct

Sustana’s organizational values, expressed within its Code of Conduct, set standards around integrity, transparency, accountability, and sustainability for all our employees. We expect these values to be upheld by our suppliers and require them to sign and conform to our Supplier Code of Conduct. It addresses in detail our expectations for suppliers around labour and human rights issues, including child labour, forced and compulsory labour, freedom of association, respect and dignity, discrimination, and health and safety.

Suppliers and their employees, contractors and agents are expected, at a minimum, to comply with the requirements set forth in our Supplier Code of Conduct and with the provisions of the laws and regulations in each jurisdiction(s) in which the suppliers operate. Furthermore, suppliers are expected to adopt appropriate policies, standards, procedures, contingency measures, and management systems to ensure its operations are managed sustainably.

Modern Slavery Risk Management: Verification, Certifications, and Auditing

All Sustana’s facilities and major operations are in the United States and Canada and most goods and services are procured from North America. While we recognize that modern slavery exists in all countries, states, and provinces, we have adopted a region and industry-specific approach to managing modern slavery-related risks in our supply chain.

The table below illustrates some of our recent actions to verify, audit and require certifications related to modern slavery risk for both our own operations and that of our suppliers.

Verification	<ul style="list-style-type: none"> • Since 2022, through EcoVadis (an independent third party), Sustana conducts a high-level ESG risk screening of its suppliers using a geographic and industry-based risk approach. • Since 2022, Sustana works with Sphera (an independent third party) to engage and survey its suppliers, representing more than 90% of
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¹ United Nations Development Program, *“Corruption and Contemporary Forms of Slavery: Examining Relationships and Addressing Policy Gaps”*, September 30, 2021.

	total spend in 2021, on environmental and social topics. Specifically, we sought to verify if our suppliers had a policy on human rights addressing forced and child labour, and whether they engaged their own supply chains on social issues.
Audits	<ul style="list-style-type: none"> • Sustana’s fiber and paper facilities are audited annually by certified independent third parties (e.g., Preferred by Nature and SCS Global) to maintain their FSC certifications, which includes the areas of child, forced and compulsory labour. These audits have historically been announced on-site audits, but since the Covid-19 pandemic, some have been remote. All facilities passed their audits in 2022 and 2024 and maintain their certification. • Through EcoVadis (an independent third party), Sustana conducted announced desktop audits of 40 suppliers on ESG risk, including on human rights and modern slavery. • All Sustana’s wood fiber suppliers were audited by independent third parties to receive their FSC certification, which included the areas of child, forced and compulsory labour.
Certification	<ul style="list-style-type: none"> • Sustana (e.g., Sustana Fiber) holds FSC certification for all fiber products produced. • All Sustana’s virgin fiber suppliers are FSC certified.

Training

In 2022 and 2023, all Sustana’s buyers, its Chief Operations Officer, and its Director of Logistics and Supply Chain were trained on sustainable procurement, which covered the topics of labour and human rights, such as child labour.

Legal Disclaimers

Sustana reserves the right to modify this policy at its discretion. Updated policies will be shared in a timely manner.

Effective: March 6, 2023

Action	Major Revisions and Comments (if any)	Version and Date
First Edition	First version drafted by Vice President of Sustainability and reviewed by the CEO, CCO and Director of Logistics and Supply Chain	Version 1 March 6, 2023
First Revision	Reviewed by the ESG Committee, signed by CEO	Version 1.1 October 1, 2024



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