



klöckner pentaplast

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE YEAR ENDED 31 DECEMBER 2025

This statement is made by Kleopatra Holdings 1 S.C.A. and all relevant subsidiaries (the "Klöckner Pentaplast Group") pursuant to their obligations under section 54 of the UK Modern Slavery Act 2015, the California Transparency in Supply Chains Act of 2010 and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act¹. This statement sets out the steps that we have taken to combat modern slavery, including forced labour, human trafficking and child labour in both our supply chains and business for the year ended 31 December 2025. In this statement, the term "modern slavery" is inclusive of all forms of modern slavery, including human trafficking, forced labour and child labour.

Our Business and Supply Chain

We produce world-class innovative high-barrier protective films for leading companies across the globe and are proud to have marked our 60th anniversary in 2025. Our films safely package food, protect pharmaceuticals, and deliver products. We make film for everything from credit cards to meat trays, to decorative surfaces to pharmaceutical and medical device packages. With a broad and innovative portfolio of packaging and product films and services, we play an integral role in the customer value chain by safeguarding product integrity, assuring safety and consumer health, improving sustainability, and protecting brand reputation. As at 31 December 2025, the Klöckner Pentaplast Group had 27 sites in 16 countries and employs just over 5,000 people committed to serving customers worldwide.

With over 10,000 suppliers based globally, our two main procurement categories are

- plastics and chemicals used to make our finished product, and;
- goods and services not for resale used to run our business such as machinery, transportation utilities and professional services.

Our Commitment

We are committed to preventing, identifying, and addressing modern slavery risks across our business and supply chain. We operate a zero-tolerance approach to all forms of modern slavery and continuously strengthen our due diligence, monitoring, and remediation processes to uphold this commitment. We expect all suppliers and business partners to adhere to equivalent standards and to demonstrate compliance through robust policies, practices, and transparency.

We are committed to complying with both the letter and the spirit of applicable laws in all jurisdictions in which we operate, and to conducting business in accordance with the highest standards of integrity and international business ethics. This includes alignment with globally recognised frameworks, such as the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, which underpins our approach to human rights and labour standards.

In 2022, we strengthened our commitment to responsible business practices by becoming a signatory to the United Nations Global Compact (UNGC), whose Ten principles across Human Rights, Labour, Environment and Anti-Corruption

¹ This statement covers the following entities that are required to make a statement under the following laws:

- the UK Modern Slavery Act 2015: LINPAC Senior Holdings Ltd., and its subsidiaries
- the California Transparency in Supply Chains Act: Klöckner Pentaplast of America, Inc.
- the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act: Klöckner Pentaplast of Canada Inc.



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are fully embedded in our values, policies and governance framework, and guide our approach to sustainable and ethical business conduct.

In recognition of our commitment, we have been awarded the EcoVadis Gold Medal rating for the fifth consecutive year. This places us within the top 1% of suppliers within the plastics manufacturing industry based on our performance across key ESG metrics, including labour and human rights standards.

Our Key Policies and Approach to Accountability

Our Code of Business Conduct and Ethics (kp Code), Supplier Code of Conduct, Sustainable Procurement Policy and Labour and Human Rights Policy form the foundation of our approach to preventing modern slavery across our business and supply chain. The policies have been developed with the input of multiple stakeholders across our business and are regularly reviewed to ensure continued relevance and effectiveness.

kp Code

The kp Code contains specific provisions addressing human rights, labor standards and ethical business conduct. It expressly affirms our commitment to the prevention of modern slavery, servitude, human trafficking, and all forms of forced or compulsory labor.

All employees receive a copy of the kp Code as part of the onboarding process and are required to complete annual refresher training. Breaches of the kp Code are treated seriously and may result in disciplinary action, up to and including termination of employment.

The kp Code encourages and enables all staff to report anything of concern relating to non-compliance with laws, including in relation to human rights, either directly to management or through our kpEthics Hotline, which allows for confidential and anonymous reporting (where permitted by law). We prohibit retaliation of any kind against employees or other persons for complaints submitted in good faith. Additionally, no employee will be adversely affected or disciplined by the Company because the employee refuses to carry out a directive which, in fact, constitutes a violation of any laws or the kp Code.

The kp Code is available to all employees in local languages on our intranet and publicly on our website [kp Business Code of Conduct and Ethics](#). Amendments to the kp Code must be approved by the Board.

Supplier Code of Conduct

Our Supplier Code of Conduct sets out the standards we expect from all suppliers, vendors, and other business partners, including strict adherence to human rights and labour standards. We require all suppliers to operate in accordance with these principles and to acknowledge and implement our Supplier Code of Conduct, which provides guidance for doing business with Klöckner Pentaplast.

We adopt a risk-based approach to supplier management and are committed to preventing modern slavery within our supply chain. Where non-compliance is identified, we will take steps to suspend or allow corrective action, or in the end to cease business with any third party which we discover to be complicit in such practices. We will also report serious violations to the relevant authorities, when required.



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Since 2023, we have used a cloud-based system to categorise and analyse risk exposure in our supply chain. We prioritise strategic and/or high-risk suppliers and apply data screening based on ISO and NACE codes that take into account :

- country governance, track record and infrastructure for monitoring and enforcement of human rights and labour laws;
- type of manufacturing process or operational activity and the related risks to worker health and safety; and
- critical political, current affairs or business news screening.

Suppliers within scope are subject to self-assessment questionnaires, with enhanced ESG assessments required for selected strategic or high-risk suppliers. These ESG assessments cover in a more concrete manner key areas of environmental protection, human rights and labour, anti-bribery and anti-corruption, health and safety and supply chain responsibility. An extra assessment on conflict minerals is assigned to those suppliers with specific risk in that area.

For a more comprehensive summary of our expectations for our suppliers, please refer to our Supplier Code of Conduct through this link: [Supplier Code of Conduct](#)

Sustainable Procurement Policy

Our Sustainable Procurement Policy reinforces our commitment to responsible sourcing and integrates internationally recognised standards, including the principles of the International Labour Organization, the UN Global Compact and the UN Universal Declaration of Human Rights. It establishes expectations for supplier engagement, risk management, and continuous improvement across our supply chain. This policy may be found through this link: [Sustainable Procurement Policy](#).

Labour and Human Rights Policy

In 2023, we introduced our Labour and Human Rights Policy to further strengthen our framework for respecting and promoting human rights. This policy formalizes our commitment to the dignity, fair treatment and protection of all individuals connected to our business and value chain, which aligns with internationally recognised human rights standards. This policy may be found through this link: [Labor and Human Rights Policy](#).

Training

Key members of the global and local purchasing teams receive targeted training on modern slavery and human trafficking during their onboarding to the company and are retrained annually. All employees are required to certify each year they have read the kp Code and agree to adhere to the policies contained therein.

Monitoring and Performance

We have not identified any incident of modern slavery in our business or supply chain during the year ended 31 December 2025. Therefore, no remediation measures were necessary. If we do at any time identify any forced labour activities, we will consider the appropriate action and remediation strategy to follow international standards.



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Looking Ahead

We remain committed to upholding human rights in our business, and we review our progress and effectiveness in combatting modern slavery on an annual basis. In the coming year, we will continue:

- Our risk assessment on suppliers with a focus on Environment, Human Rights and Political risks;
- With internal procurement training on “Value Chain Risk Management”; and
- Ongoing reviews of our policies, programs, and strategies to prevent modern slavery in our business and supply chains.

This statement has been approved by the board of directors of Kleopatra Topco S.A., on behalf of its subsidiaries and affiliates, pursuant to section 54(1) of the UK Modern Slavery Act 2015 and subparagraph 11(4)(b)(ii)] of the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

In my capacity as Interim Chief Executive Officer of the Klöckner Pentaplast Group, and not in my personal capacity, and in accordance with requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, (the Act) and in particular section 11 thereof, I attest to have reviewed the information contained in this statement. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this statement is true, accurate and complete in all material aspects for the purposes of the Act and for the reporting year listed above.

Michael Zacka, Interim Chief Executive Officer of the Klöckner Pentaplast Group

On behalf of the Board of Directors of Kleopatra Topco S.A.

May 31, 2026

A handwritten signature in blue ink, appearing to be 'M. Zacka', written over a horizontal line. The signature is stylized and cursive.