



Report on

Responsible Business Conduct 2020

for Elopak AS

□

SUSTAINABLE DEVELOPMENT GOALS



To Readers Of The Report

Business is key for the achievement of the Sustainable Development Goals (SDGs). A well-functioning and responsible business community contributes to sustainable development through job creation and innovative solutions to global challenges. However, business operations can also have a negative impact on people, the planet and the society. Members of Ethical Trade Norway have committed themselves to work with due diligence for a more sustainable business practice.

The basis of this work is Ethical Trade Norway's Declaration of Principles, which covers the decent work agenda, human rights, environment/climate, anti-corruption and animal welfare. Members are obliged to report annually on challenges they face and on measures carried out to address these. The reporting template is this year for the first time based on the OECD due diligence model. It is new for us and new for our members. It is this report you are currently holding in your hands. The report is publicly available on our website.

The template seeks to respond to the expectations concerning due diligence for responsible business conduct as described in the UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises. Ethical Trade Norway's report covers essential elements of the Global Report Initiative (GRI) reporting framework and can be used as a progress report for the Global Compact.

Heidi Furustøl

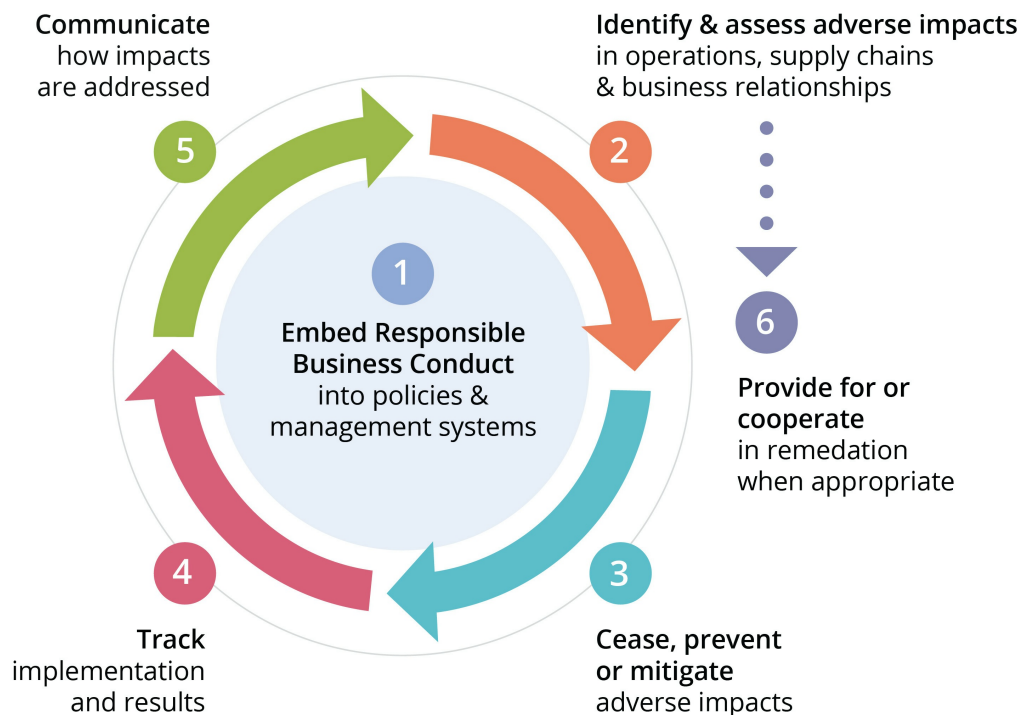
Executive Director

Ethical Trade Norway

Due diligence

This report is based on the UN Guiding Principles on Business and Human Rights and the OECD model for Due Diligence for Responsible Business Conduct.

The model has six steps that describe how companies can work for more responsible and sustainable business practice. However, being good at due diligence does not mean no negative impact on people, planet and the society. It means that the company is open and honest about challenges faced and shows how this is managed in the best possible way in collaboration with its stakeholders. This report is divided in chapters following the OECD model.



Preface From CEO

Responsible business conduct is the foundation of our license to operate. We in Elopak take this responsibility very seriously. As a global company, it is our policy to act in accordance with applicable laws and regulations and high ethical standards across our value chain. Elopak is committed to leaving behind a better planet for the next generation. Therefore, we strive to establish solid, sustainable partnerships. We build and maintain trust of one another, our customers, business partners and communities where we operate by working responsibly and safely, caring for environment, acting with integrity, treating others with respect and honoring our commitments.

Building lasting and sustainable value is of paramount importance for us. In Elopak Sustainability is not something we do; it is something we are. Our ambition is to keep the products of our customers unchanged and the world unharmed. We are proud of Elopak's achievements since we started reporting systematically on our environmental impact 13 years ago. Reducing energy consumption, improving efficiency and sourcing renewable electricity led to a 70% reduction in emissions from our operations in the period from 2008-2018, confirming our strong commitment and long-term focus.

Packaging by nature™ is the core of our business – our cartons and our people. Sourcing sustainable and renewable raw materials remains our key focus area, with a continuous drive on responsible forestry and our renewable PE products.

Becoming a carbon neutral company in 2016 was a key milestone for us. Neutralizing our remaining emissions is done by investing in carbon reduction projects outside our own value chain. This is not just to claim that we are carbon neutral - but to do something good for the planet and its people. Our low carbon and circular economy approach to packaging aims at supporting our customers in reducing their packaging carbon footprint and reaching their sustainability goals. This is in addition to our ongoing fight against food waste.

We recognize our part in the global struggle to preserve the planet for future generations. We offer an environmentally friendly package, sourced from sustainable raw materials, through sustainable value chains. We are even a net zero company, enabling us to offer carbon neutral Pure-Pak® cartons to our customers. And we raise the bar to further improve over the next years.

Recently Elopak strengthened the focus on sustainability even further, thorough embedding sustainability as part of our overall business strategy. A set of goals and strategic initiatives were anchored in the Board of Directors and several projects have been initiated in various business units. Elopak was one out of 87 companies, and the first packaging company, to lead the way towards a 1.5°C future at the UN Climate Action Summit, through our Science Based Targets.

Elopak is reporting annually to CDP (climate), and received in 2020 the overall score B. We also report in Ecovadis and reached in 2020 a score of 65 out of 100 points (93rd percentile).

Please visit our website to watch a video and learn more about Elopak and our commitment to sustainability:

<https://www.elopak.com/sustainable-company/>

- SDG 17: Partnership for the goals
- SDG 15: Life on land
- SDG 12: Responsible consumption and production
- SDG 8: Decent work and economic growth

" To leave your product unchanged and the world unharmed "

Thomas Körmendi
CEO and President, Elopak AS

Company information and business context

Key company information

Company name

Elopak AS

Head office address

Karenslyst Alle 53, N-0279 Oslo

Main brands, products and services offered by the company

Elopak is a global supplier of paper-based packaging system solutions for liquid products. The best known product is the Pure-Pak® carton. Elopak produces cartons for both chilled and ambient (aseptic) applications, as well as closures for the cartons.

Description of company structure

Elopak is an international supplier of paper based packaging solutions for liquid food. Based in Norway, Elopak is wholly owned by Ferd Group, one of Norway's largest privately owned industrial groups.

Elopak is a global company operating on several continent with 11 manufacturing units as well as market units and associates in more than 40 countries plus customers in over 80 markets. The company employs approximately 2800 people (including joint ventures).

Elopak AS is the parent company of the group, which consist of a number of separate legal entities. The 2019 group turnover was almost 1 bn EUR. The group head office is located in Oslo, Norway.

Turnover in reporting year (NOK)

9 800 000 000

Number of employees

2 132

Major changes to the company since last reporting period (mergers, acquisitions etc.)

In 2020 Elopak have sold out of our Joint Venture with Obeikan in Saudi Arabia.

Otherwise the business is unchanged from 2019.

Contact person for the report (name and title)

Jeanette Berge Knutsen, Sustainability Specialist

Email for contact person for the report

jeanette.knutsen@elopak.com

Supply chain information

General description of the supply chain and the company's sourcing model

Our Corporate Procurement functions is a mix of central and local teams. Our key raw/direct materials are sourced centrally while sourcing of equipment, components, parts and services to our customers in addition to goods and services to our own production sites are done both centrally and locally.

We are an international company with an global network of suppliers and partners. Our supply chains are predominately European (in terms of both volume and spend). Key raw materials and direct materials are mainly sourced from Sweden, Finland, United States, Germany, the Netherlands, Switzerland, France and Belgium and also from China, Brasil and Mexico. Our caps are mainly sourced directly via suppliers based in Germany, Luxembourg, Hungary, Spain, France, USA, Canada and the UK. Equipment (Filling Machines buinesss) is partly sourced direct via suppliers in Italy or Japan.

The installation and maintenance of equipment at our customer's sites is undertaken by Elopak engineers or third-party engineering companies in the countries we operate.

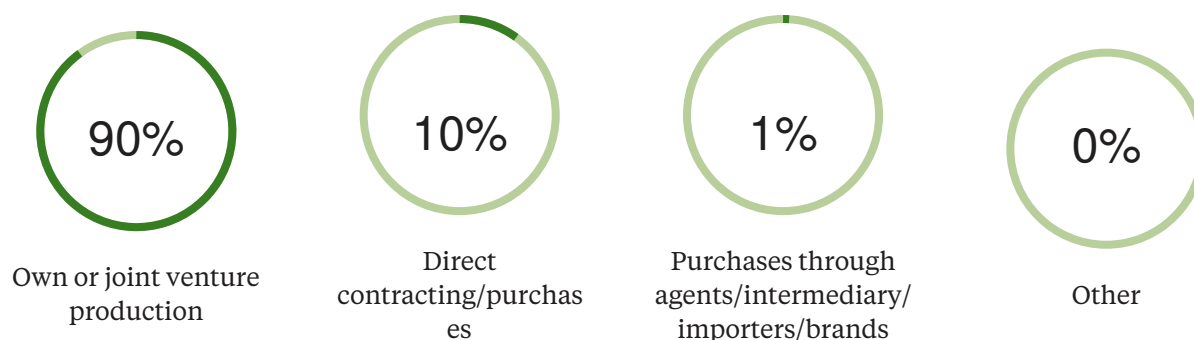
Number of suppliers with which the company had commercial relations in the reporting year

3 500

Comments to number of suppliers

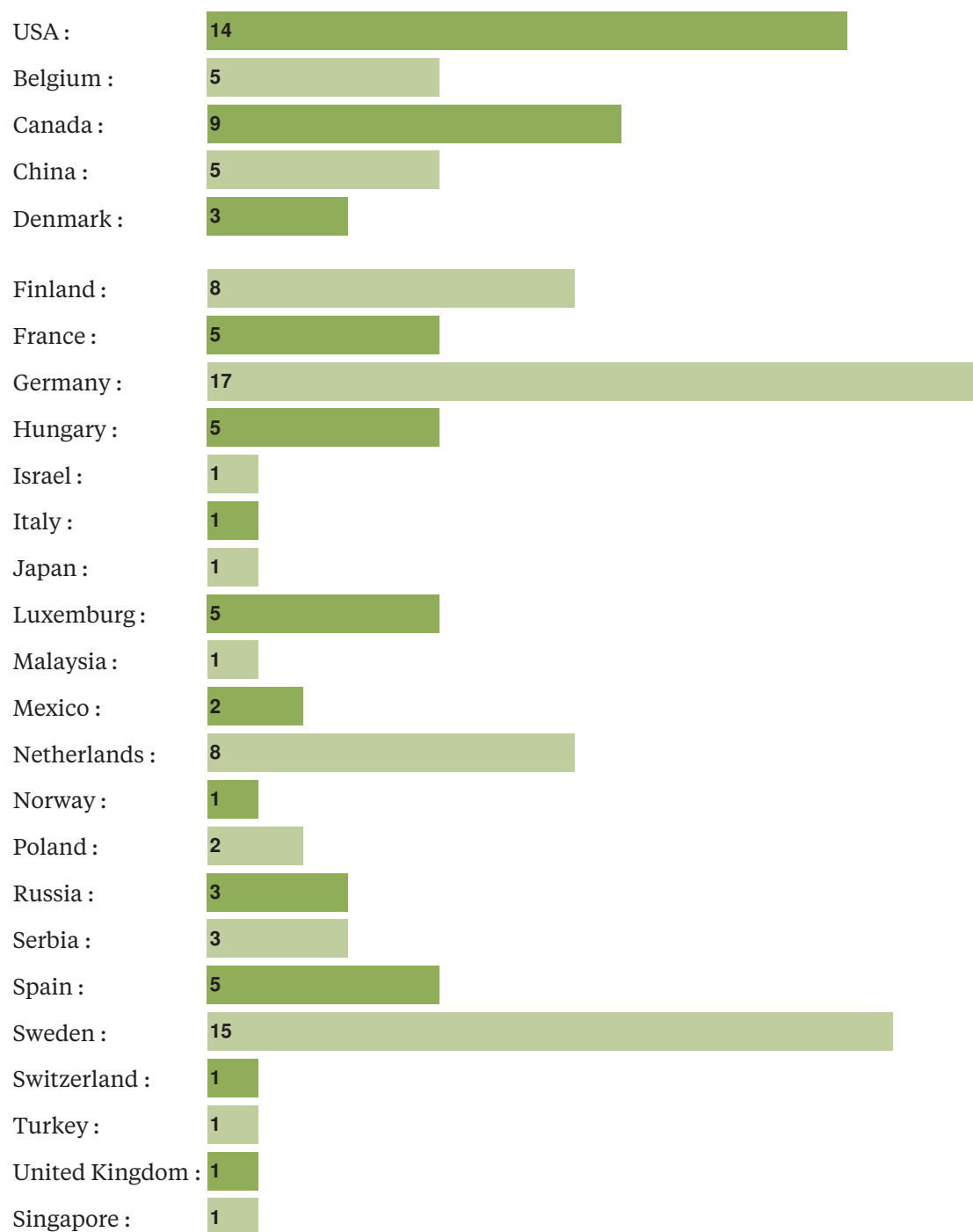
Number of suppliers (group) is an approx. estimate. Abt 3500-3800

Approximate ratio by sourcing options



Above are approximate figures. We are a manufacturing company with a network of own production plants. Our closure business and part of our filling machine business is direct purchased via external suppliers

List of first tier suppliers (producers) by country



This covers main raw material suppliers (manufacturers) + direct purchases of filling machines and caps (approx 75% of group spend) for Elopak group

State the number of workers at first tier suppliers (producers) that the company has an overview of and the number of suppliers this overview is based on

Number of workers

Number of suppliers

Comments to number of workers

We do not collect/have a detailed overview of number of workers yet

Key inputs/raw materials and associated geographies

Paperboard	Sweden
Paperboard	Finland
Paperboard	USA
Packaging / Pallets	Germany
Packaging / Pallets	Denmark
Packaging / stretch film	Malaysia
Packaging / shrink film	Sweden
Packaging / corner protection	Germany
Packaging / corrugated board	Poland
Packaging / Top foil	Poland
Packaging / Bottom sheet	France
Packaging / Paper core	Sweden
Packaging / Wrap paper	Sweden
Packaging / Airbags	Turkey
Packaging / Airbags	Denmark
Packaging / Corrugated boxes	Canada
Aluminium	China
Aluminium	Germany

Foil / LS Strip	Sweden
Foil / Window Film	Netherlands
Inks and solvents / UV Flexo ink	Belgium
Inks and solvents / UV Flexo ink	Sweden
Inks and solvents / UV Flexo ink	Switzerland
Inks and solvents / Adhesive laqueur	Serbia
Inks and solvents / Adhesive laqueur	Canada
Inks and solvents / Adhesive laqueur	Mexico
Inks and solvents / Adhesive laqueur	USA
Inks and solvents/ EB Offset ink	Belgium
Inks and solvents/ EB Offset ink	USA
Inks and solvents/ Solvent based ink	Mexico
Inks and solvents/ Water based ink	France
Inks and solvents/ Water based ink	Canada
Filling Machine (direct purchase)	Japan
Filling Machine (direct purchase)	Italy
Plastic Resin / LDPE	Germany
Plastic Resin / LDPE	Netherlands
Plastic Resin / LDPE	USA
Plastic Resin / LDPE	Brazil
Plastic Resins / Metallocene	Germany
Plastic Resins / Metallocene	Netherlands

Plastic resins / EAA	Belgium
Plastic Resins / Surlyn	USA
Plastic resins / EMAA	Norway
Plastic resins / EMAA	Germany
Plastic resins / EVOH	USA
Packaging / Pallets	Canada
Packaging / Pallets	Netherlands
Packaging / Corrugated boxes	Netherlands
Packaging / Glue	Canada
Packaging / Glue	Sweden
Packaging / Shrink film	Sweden
Packaging / Stretch film	Malaysia
Packaging / Tape	Canada
Packaging / foil	Denmark
Packaging / foil	Poland
Closure /caps	Canada
Closure /caps	France
Closure /caps	Germany
Closure /caps	Hungary
Closure /caps	Israel
Closure /caps	Luxemburg
Closure /caps	Russia

Closure /caps	Spain
Closure /caps	United Kingdom
Closure /caps	USA
Filling Machine (direct purchase)	China
Plastic Resins / Metallocene	Singapore

Above is an overview of our main Direct/Raw Material categories accounting for approx 75% of group spend including also Filling Machine and Caps business (direct purchase not part of production) for Elopak group

Is the company a supplier to the public sector?

No

Goals and progress

Goals and progress for the reporting year

1

Goal : Elopak had a goal to improve sustainability performance in 2020, measured by scoring by Ecovadis.

Status : Score was improved from 60 in 2019 to 65 in 2020. Action plan to further improve our performance is being done during Q1 2021

2

Goal : Elopak has a goal to report according to the Global Reporting Initiative (GRI) for 2020 and is in the process of completing this (target date end April 2021).

Status : On-going, sustainability report is to be completed early spring 2021 using GRI framework

3

Goal : Sustainability challenge and awareness training among all employees was done in 2020

Status : Challenge is completed, working on evaluating incoming ideas

4

Goal : Target to assess key supplier on their sustainability performance using common industry tool (Ecovadis)

Status : Key suppliers assessed via Ecovadis and Corrective Actions management /follow up initiated to secure continuous improvement and engagement with suppliers

5

Goal : Science Based Targets GHG reduction scope 1, 2 and 3 towards 2030 vs 2017

Status : Scope 1: X%, Scope 2: 100% renewable electricity

Goal for coming years

1

70% recycling of beverage cartons in Europe and Canada by 2025

2

100% renewable materials available in beverage cartons by 2030

3

Aims for a 55% reduction in Elopak's 2017 level of emissions by 2030

4

Continue purchasing 100% renewable electricity covering all Elopak operations.

5

Reduce emissions from our value chain by 16% by 2013 (Science based target, scope 3)

6

Elopak offers a top-quartile motivating workplace by 2025

7

85% of employees have individual targets and documented competence development plans

8

Target the same distribution in gender diversity across all hierarchical levels

9

Elopak delivers improved sustainability performance and reporting by 2022

10

Key raw materials sourced through sustainable value chains by 2025

11

Elopak makes no compromises on safety and aims for zero lost time injuries (LTIs)

12

Evaluate key suppliers according to sustainability criteria by 2022

13

100% recyclable beverage cartons in all markets by 2025

14

Active engagement in industry associations in our geographical markets

15

100% of all fibers in beverage cartons originate from certified sustainable forestry according to the most stringent and credible standards available



1

Governance and commitment to responsible business conduct

Commitment to sustainability means that the business should have relevant policies and codes of conducts in place, as well as effective management systems for implementing them. Central to this is the company's work with due diligence. This means, among other things, the business need strategies and action plans for how the company identifies and manages its risk of negative impact on people, society and the environment, including through business relationships and in the supply chain. Systematic management of such risks will strengthen the company's contribution to the Sustainable Development Goals. Strong commitment from top-management, and clear division of the responsibility for conducting due diligence is key. Those involved need to know how to proceed. Sustainability should be an integral part of business operations. Essential to this is transparency on the company's commitments, challenges faced and measures undertaken to manage those challenges.

1.A Policy commitment

1.A.1 What does the company say publicly about its commitment to respect people, society and the environment?

Elopak is committed to conducting business in an ethical, socially and environmentally responsible manner. As a global company, it is our policy to act in accordance with applicable laws and regulations and high ethical standards across our value chain. The principles related to our business ethics are embedded in the Elopak Code of Conduct. The Code of Conduct and Elopak Anti-Corruption policy stipulates rules and guidelines related to business ethics and compliance, equal opportunity, non-harassment, and observation of health and safety standards.

Elopak has developed a Global Supplier Code of Conduct (SCoC), to illustrate and clarify what we expect from our suppliers in the areas of business ethics, human rights, labor practices, health and safety and the environment. The SCoC outlines the minimum standards Elopak requires its suppliers to comply with when doing business with Elopak in addition to applicable laws and regulations. The SCoC is based on the ten principles of the UN Global Compact, the UN Declaration of Human Rights and core ILO (International Labor Organization) conventions.

We are also part of an commitment across the industry to secure that all wood fibers are sourced from legal and acceptable sources. We source 100% of fibres in accordance with the standards of FSC.

1.A.2 How is the commitment/policy developed and how is it anchored in the company?

Elopak Code of Conduct is one of the principle steering documents. The Code of Conduct has been approved and endorsed by the Board of Directors. Internal stakeholders have been consulted in the process of development of the Code of Conduct

The Code of Conduct is an integral part of the legal employment contract with Elopak for employees and contractors. All employees receive an invitation to do PureEthics compliance training on an annual basis. This is our Code of Conduct and Anti-Corruption Policy e-learning program launched in order to continuously focus on importance of ethical behavior and compliance. Elopak's goal is that all employees perform this compliance training program every year as a mandatory task. A more in-depth dilemma training workshop concept has also been offered for selected target groups like management teams in all legal units, employees in sales, marketing, purchasing and controller roles.

Elopak is committed to building a culture of trust where employees are comfortable to ask questions, seek guidance, raise concerns and report suspected violations. Suspected breaches of the Code of Conduct are to be reported in the line management or if this is not feasible through Elopak's external whistleblower channel. The whistleblowing service is provided by an external service provider KPMG Norway and ensures that our employees and external stakeholders can report their concerns confidentially and anonymously with no ability to trace back to the notifier. The whistleblower channel information is available on the Elopak website.

In 2018 Elopak launched a project to ensure compliance with the GDPR. Elopak has also conducted nano-trainings for all employees in order to raise awareness as to compliance with the new regulations. GDPR compliance program and implementation has been handed over to an appointed Global Data Protection Officer and appointed Local Data Protection Coordinators.

The Supplier Code of Conduct was developed in cooperation with key internal stakeholders (Quality & Safety, Sustainability, Legal and Procurement) and was also benchmarked with external practices and codes (including Etisk Handel). The Supplier Code of Conduct is part of general procurement policy for all procurement personnel. We started implementing our Supplier Code of Conduct in 2016 and initially targeted raw material suppliers in addition to other key (mainly direct) categories. In addition, our Category Managers and Purchasing Managers are responsible for continuously ensuring that all suppliers sign our Supplier Code of Conduct or demonstrate conformance by documenting that corresponding policies or codes are in place, as part of all new and renegotiated contracts with Elopak.

By 2018 approximately 95% of our Raw Material suppliers and in total 75% of all suppliers (by spend) had either signed our Supplier Code of Conduct or demonstrated compliance.

1.B Organisation and internal communication

1.B.1 How is the work with responsible business conduct organised within the company and why in this particular way?

In Elopak we have been focusing on developing and ensuring adequate governance as to the areas of Environment, Social and Governance aspects of our business conduct.

The overall Ethics & Compliance governance has been strengthened by establishing a Board Audit Committee and a dedicated Chief Compliance Officer (CCO) role. Chief Compliance Officer has a dual reporting line and reports directly to the company's CFO (member of the Elopak Group Lead Team) and also has a dotted reporting line to the Board Audit Committee. The positioning and the reporting lines of the CCO have been established that way to ensure an independence of the CCO as it is recommended by best practice guidance for corporate compliance programs.

We are working on reshaping our compliance program which is designed to help us: promote a culture of ethical and responsible business conduct, and prevent, detect and respond to breaches of laws, regulations or internal policies (non-compliance/ misconduct). We defined 3 key pillars of compliance work to drive improvement across Elopak including strengthening of the compliance program, focusing on business ethics and compliance culture as well as speaking up and raising concerns.

The corporate sustainability function consists of 2,5 full-time employees reporting to the Director Sustainability, who reports to CMO (Marketing and Product Management). CMO is in the C-suite (Group Leadership Team-GLT) and reports to the CEO. CEO is in the Board of Directors (BoD) and regularly presents environmental and sustainability issues.

Marketing and product management is a wide business area in Elopak and sustainability as a topic fits well into this since it is a topic frequently discussed with customers, and it strongly impacts our product portfolio, which also lies under this function. Elopak is a lean organization with few business areas in the C-suite, and the CEO is frequently in contact with all C-suite members but also the second tiers (e.g. directly to the Director Sustainability)

Director sustainability is responsible for the company's sustainability performance and for executing the sustainability program, which is an embedded part of the company strategy. This function is engaged in public affairs, monitoring recent developments and trends within sustainability and providing clear recommendations to the CEO and the BoD. The recommendations from Director Sustainability is provided to the C-suite (GLT - top management) via the CMO, who is accountable for the sustainability function. The CEO brings issues to the BoD for decision making where needed (in terms of strategy, budget and business plans). Director Sustainability frequently takes part in C-suite meetings and in BoD meetings to present relevant topics and to report on progress on the sustainability program (quarterly updates). C-suite members have specific targets and KPIs (some of which linked to bonus-schemes) related to the various elements in the sustainability program.

1.B.2 How are employees made aware of the ways in which responsible business conduct should inform their decisions and actions?

Training and communication is crucial when it comes to building awareness and competence in the organization. We inform all employees through articles on our intranet (Elonet), screens in social areas and posters if needed. The sustainability program was developed with a group of employees from all the different business areas in the company. A sustainability challenge to engage all employees was held (digitally) in 2020 where all employees were invited to send their ideas. More than 150 ideas were submitted.

All employees are asked annually to do PureEthics; our Code of Conduct and Anti-Corruption Policy e-learning program in order to continuously focus on ethical behavior and compliance. Elopak wants all employees to perform the program every year as a mandatory task.

Key employees in the procurement function/network have received relevant training on Responsible Sourcing and training related to our Ecovadis Supplier Assessment Initiative kicked off in April 2020. The responsible Category and/or Purchasing Manager is responsible for the assessment process for their respective suppliers. They have also received specific training on Corrective Actions Management related to the Ecovadis assessment during 2020. In addition, steering/governing documents are being updated/improved including roles and responsibilities related to Responsible Business Conduct. These will be implemented during 2021.

Additional training and engagement initiatives will be further developed and conducted.

1.B.3 How does the company make sure employees have adequate competencies to work towards implementing responsible business conduct?

We have had several articles on the intranet to increase awareness and knowledge. Additionally, environmental topics are covered in 5 modules of e-learning available for all employees. We also distributed a nano-learning using the free sustainability training modules prepared by (among others) the Norwegian School of Economics (NHH), available on YouTube. These modules were launched to all employees once per week in a period of five weeks in April 2020.

Key Responsible Business experts conduct additional training relevant for their functions and areas of responsibilities.

1.C. Plans and resources

1.C.1 How is the company's commitment to respect people, society and the environment rooted in strategies and action plans?

Elopak developed and implemented a sustainability program in 2019, which was first approved by the Group Leadership Team (GLT - top management) and then by the Board of Directors. Within this roadmap, there are three main areas – responsible company, environmental impact and circular economy. These three areas are defined also within the company's overall business strategy, and specific targets and KPIs are assigned to the relevant business areas.

1.C.2 How is the company's strategies and action plans to work towards being responsible and sustainable followed up in top management and in the board?

The Group Leadership Team (GLT - top management) is the steering committee for the sustainability program, which in turn was approved by the BoD in 2019. Director Sustainability reports quarterly to the GLT on progress of the program.

Overall reporting on ethics and compliance goals, action plans, implementation will be reported to the Board Audit Committee on a quarterly basis starting from Q1 2021.

1.D Partnerships and collaboration with business associates, such as suppliers

1.D.1 How does the company make clear in its business relationships (in particular in the supply chain) the importance it places on responsible business conduct?

We require our suppliers to comply with our Supplier Code of Conduct and to implement corresponding measures in their own supply chains. The SCoC forms an integral part of contracts and agreements with suppliers and functions as an integral part of the Supplier Qualification process. Our Category Managers and Local Purchasing Managers are responsible for continuously ensuring that suppliers sign our SCoC or demonstrate conformance by documenting that corresponding policies or codes are in place, as part of new and renegotiated contracts with Elopak.

As part of the supplier qualification and performance monitoring process all new suppliers undergo a prequalification review including SCoC engagement.

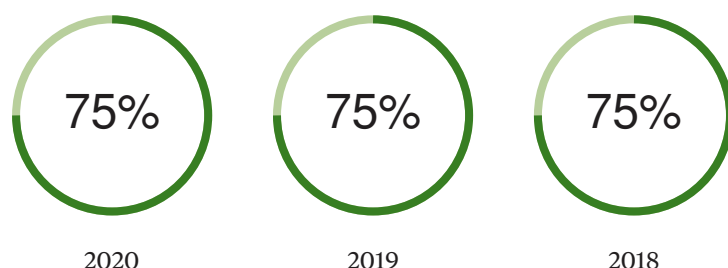
We have during 2020 improved our Supplier due diligence process and framework by entering into agreement with Ecovadis as our main risk assessment platform/tool (common tool in our industry). The first assessment campaign launched in April targeted our key suppliers mainly delivering critical materials and services to our core business. In parallel we have also improved our own framework and updated our Supplier Questionnaire to be used for qualification and performance monitoring purposes as a complementary to Ecovadis assessment which will mainly focus on critical suppliers as a start.

Transparency and credible proof of sustainability is key to us. Therefore we also ensure that the main raw materials, paperboard and renewable plastics, are sourced and verified through certifications systems, also considering social aspects, such as FCS™ and ISCC. For these raw materials stricter criteria for sourcing activities are specified in separate procedures. We are currently also in the process of undergoing certification to be able to source Aluminum in accordance with ASI (Aluminum Stewardship Initiative).

In cooperation with other business partners, Elopak conducts a risk based due diligence process to detect potential risks and implement adequate mitigation measures.

Indicator

Percentage of the company's suppliers that have accepted guidelines for suppliers



By 2018 approximately 95% of our Direct/Raw Material in addition to some other key categories (such as logistics and machinery) suppliers and in total 75% of all suppliers (by spend) had either signed our Supplier Code of Conduct or demonstrated conformance. Figure is approx the same for 2019 and 2020.

1.E Lessons learned and changes

1.E.1 What lessons has the company learned during the reporting period concerning sustainability, and what has changed as a result?

In 2019, Elopak engaged a sustainability consultant, Terrafiniti, to do a gap analysis of our sustainability work. The analysis was done through in-depth interviews with a number of colleagues as well as a study of our website, our strategies, policies and reports. This gap analysis was presented to the Group Leadership Team (GLT - top management) and it was the base of the sustainability program development. The largest internal change was the inclusion of social and ethical issues through closer collaboration between sustainability, HR, Safety/Quality and purchase and Compliance function.

Previously, Elopak had a strong focus on environment, but during 2019, the environment team was re-named to sustainability team, and closer bonds with the other business units were created. There is a sustainability group consisting of Director Sustainability, Director Corporate Procurement, Chief Compliance Officer, Specialist Director Group HR, Senior Manager Group Quality and Safety, and Sustainability Specialist. This group meets regularly and contributes in all reporting and performance work.

Elopak has conducted more external training and engagement on the topic of Sustainable Procurement both via existing and new partners (Ethical Trade, Procurement Leaders Sustainability forums and networks, webinars with external professionals as well as with Ecovadis) and has gained increased knowledge and competence on best practice and trends within the area.

A man with a slight smile, wearing a white hairnet and a dark blue long-sleeved shirt, is looking towards the camera. He is in a factory or industrial setting, with blurred machinery and structures in the background. The lighting is soft, highlighting his face.

2

Defining the focus for reporting

Identify and assess the company's impact on people, society and environment

“Identify and assess” is about identifying the company's risk for, and actual negative impact on, people, society and the environment, including in the supply chain and through business relations. As a first step the company should get an overall risk picture, before subsequently prioritising measures where the risk of negative impact is the greatest, i.e. salient issues. How the company is involved in the negative impact is central to determine the right actions to take. Involvement of stakeholders, especially those affected, is central when assessing risks. It is also important to consult with stakeholders when implementing measures to manage the negative impact.

2.A Mapping and prioritising

STATEMENT ON SALIENT ISSUES

Prioritising one or more risk areas on the basis of severity does not mean that some risks are more important than others, or that the company should not take action on other risks, but that risks with the greatest negative impact are prioritised first. Mapping and prioritisation are a continuous process.

2.A.1 In the table below state the salient issues associated with the company's activities and business relationships, particularly in the supply chain and during the reporting period

Salient issue	Related topic	Geography
Responsible sourcing of wood fibres (forestry)	Occupational Health and safety Environment	Finland Sweden USA
Plastic Resins/ Polymers	Environment Greenhouse gas emission	USA Western Europe
Aluminium	Forced labour Child labour Occupational Health and safety Wages Working hours Environment Corruption Greenhouse gas emission Waste Water Use of materials	China Germany

Elopak has defined the main salient issues to be related to environmental risks in the supply chain. Elopak's own impact is relatively small, but the impact of the raw materials we purchase is significant. Therefore we focus on main raw material suppliers, and work with these on both environmental, social and ethical issues.

DETERMINATION OF SALIENT ISSUES

2.A.2 Describe how the salient issues were determined, in terms of processes and sources of information, including any input from stakeholders

Supply chain related:

-Responsible Raw Material Sourcing:

Forestry was identified across the industry as a salient issue and a joint industry commitment was done in 2009 to secure that all wood fibers are sourced from 100% verified legal and acceptable sources. A commitment that Elopak achieved in 2015 by sourcing 100% fibres in accordance with the standards of FSC.

Polymers is defined as a salient issue as it is normally sourced from fossil resources which is a finite resource as well as a significant source of greenhouse gas emissions. Elopak has been sourcing renewable PE since 2014 in order to phase out use of fossil raw materials. However, using a renewable feedstock to make plastic, is also a salient issue and measures need to be taken to ensure the feedstock is not in competition with food supply or is a risk in any other social, ethical or environmental area. Various feedstocks have been used, but Elopak's clear strategy now is to use tall-oil, a forest based residue feedstock which has been evaluated and awarded the "RSB low ILUC (indirect land use change) risk certification".

Aluminium sourcing is another salient issue as it is a finite resource, and mining activities can be hazardous both to the environment and the workers. The Aluminium Stewardship Initiative (ASI) is a global non-profit standards setting and certification organisation which aims to maximise the contribution of aluminium to a sustainable society. Elopak recently became members of ASI and secure that all aluminium suppliers also are members. Processes are in place to secure sourcing of ASI certified aluminium in the near future.

ASI has developed an independent third-party Certification program to ensure sustainability and human rights principles are increasingly embedded in aluminium production, use and recycling.

General salient issues from a sustainability perspective were identified via a materiality assessment performed in 2019. Not all salient issues have been described in this reporting since they are still in the process of being defined and addressed internally. Elopak will report further on this next year.

ADDITIONAL SEVERE IMPACTS

2.A.3 Identify any severe impacts on people, society and the environment that occurred or were still being addressed during the reporting period, but which fall outside of the salient issues, and explain how they have been addressed.

The below risks have been identified and handled in the Elopak Group:

- Covid-19

During 2020, COVID-19 infections have been very well managed to protect employee health and safety and to maintain operations.

A Corporate Response Team under the lead of CHRO was established in March to align and establish local processes to avoid spreading of the virus and infection of our employees. Daily, and later weekly, meetings have been held to monitor the development of infections and take relevant precautions. Corporate guidelines for handling the pandemic were established and updated throughout 2020 for local alignment in Local Response Teams, which were put in operation at all sites. Their main tasks have been to create COVID-secure workplaces, control infection rates and for weekly reporting to the Corporate Response Team.

Elopak has carried out home office for most office people in Elopak units due to advices from local Health Authorities in order to avoid spread of infection and for protecting production and other business critical units.

Elopak has also had 'Working from home' campaign to hold up motivation for our employees and frequent information to all people in the organization has been issued on the status of infection at all sites.

-Safety on Business Travels

Elopak's employer liability is stretched from "door to door" when employees are on business travels and safety is our concern. Elopak aims to protect employee safety when travelling while also making it possible for the company to operate in conflict areas and have therefore entered into a global agreement with Falck/SCR/AIG from 1 January 2018. The group wide travel insurance program includes travel assistance service world-wide 24/7. Elopak strengthen the information to the employees for any need for local health assistance providers close to where they were staying if they got sick during their business travels during the Covid-19 period and for country information prior to travels.

Furthermore, as a part of the Falck membership the employees have access to the online risk portal containing medical and security risk information of the whole world.

Elopak has also implemented an App, Safeture Pro, with link to the web portal that will keep the employees informed on security, health and transportation issues wherever they are travelling or before a trip. Safeture Pro provides the employees with local emergency contacts and let them stay in touch with home offices, support on travels or if something unforeseen happens online 24/7. Safeture Pro has a direct call button to Falck and the employees will be directly directed to Falck.

-Crisis Management

Elopak is conducting "table top" crisis management training sessions, which is a theoretical exercise. The training is a desk training based on simulation in a single room and involves a realistic scenario relevant for Elopak.

All crises management guidelines and templates were revised ultimo 2019/primo 2020 incl. cyber-attack and IT systems failure causing critical systems. We have also implemented a backup intranet site for internal emergency and an AirScramble SMS solution.

Digital Nano training for all employees in digital IT security was repeated in autumn 2020.

- PureEthics (Code of Conduct and Anti-Corruption Policy)

The basic rules related to employee relations and conditions are embedded in the Code of Conduct and Elopak Anti-Corruption policy, which stipulates rules and guidelines related to ethical conduct of business, equal opportunities, non-harassment and observation of health and safety standards. The Code of Conduct and Anti-Corruption policy is an integral part of the legal employment contract with Elopak for employees and contractors.

- ▷ All employees receive an invitation to do the PureEthics e-learning program every year
- ▷ A more in-depth dilemma training work-shop worked out for selected target groups; GM's, sales, marketing, purchasing and controllers)
- ▷ Possible breaches of Code of Conduct and the Anti-Corruption Policy reported through an external whistleblower channel with KPMG
- ▷ A Global Supplier Code of Conduct (SCoC) outline the minimum standards Elopak requires its suppliers to comply with.
- ▷ An Ethics & Compliance Pulse Survey was carried out to all employees fall 2020.

- GDPR & CONFIDENTIALITY

GDPR Guidelines and instructions on Intranet

GDPR training for Local Data Protection Coordinators.

Nano training for all employees in order to comply with the GDPR regulations repeated in 2020 *)

GDPR audit in fall 2020.

Form 'Confidentiality Undertaking' revised in 2020.

Form 'Separate declaration regarding Intellectual Property' part of all employment contracts.

- DIGITAL SECURITY – JungleMap Nanolearning

Digital Security published to all employees March 2020.

*) Digital Privacy Awareness published to all employees September 2020.

Form 'Acceptable use of IT-tools – end-users' signed by employees and part of employment contracts.

- POSTED WORKERS DIRECTIVE – EMPLOYER'S OBLIGATION

Policy and guidelines worked out mid 2020.

Training for General Managers, HR and Technical Managers carried out in fall 2020.

- Health & Safety

Elopak safety performance has significantly improved in 2020 and we have been successful in reversing the safety trend of 2019. All KPI's show good improvement, although the LTI rate is still too high. TRI severity shows a good development over recent years and performance in individual plants shows that zero injuries is possible. Continued attention of all employees is needed to maintain and improve the current performance and key focus for everyone is to continue to develop our safety culture.

Corrective actions with focus on health and safety activities for managing a healthy and proper business environment are carried out in cooperation between the HR/HSE organization, relevant line managers and local health service providers. When relevant, employees are invited to perform alternative tasks or to work part-time as part of a program to get back to work earlier. Management also maintain a close dialogue with the European Works Council as well as local Works Councils about health and safety and preventive actions.

A woman in a blue surgical cap and gown, looking down, in a hospital setting. The background is blurred, showing other people in similar attire and bright lights.

3

Management of salient issues

Cease, prevent or mitigate negative impacts

“Cease, prevent and mitigate” is about managing findings in a way that contributes to a sustainable and responsible business conduct. The most severe negative impact on people, society and the environment should be prioritised first. This does not mean that other risks are less important or that they are not handled. The way the company is involved in the negative impact is central to taking the right action. Negative impact that the company causes or contributes to must cease, and the business must work to prevent and mitigate such risk. To address negative impact directly linked to the company, e.g. in the supply chain, the business must use its leverage to influence the entity causing the adverse impact to cease, prevent or mitigate it. This involves developing and implementing plans and routines to manage risk and may require changes to the company's policy documents and management systems. Effective management of the negative impact on people, society and the environment is a major contribution to the achievement of the SDGs.

3. A Cease, prevent or mitigate

3.A.1 For each salient issue in your supply chain, add a goal, status and describe specific actions and progress made in the reporting year

Salient issue	Responsible sourcing of wood fibres (forestry)
Goal :	wood fibers sourced 100% via verified legal and acceptable sources
Status :	Achieved since 2015
Objectives in reporting year :	Keep commitment

Actions :

Board sourced and verified through certifications system - FCS™

Salient issue	Plastic Resins/ Polymers
Goal :	50 % renewable PE for fresh milk cartons in Europe by 2025
Status :	23% of PE cartons for fresh milk sold to customers in 2020 had renewable PE.
Objectives in reporting year :	Increase sales of renewable PE cartons to customers

Actions :

Information campaigns and customer meetings with support from sustainability team.

Salient issue	Aluminium
Goal :	Sourcing of certified and sustainable aluminium where aluminium cannot be replaced
Status :	ASI membership signed. All Alu suppliers are ASI certified
Objectives in reporting year :	Working with suppliers to secure ASI certification of all supplier plants. Internal evaluation of ASI membership and certification. In parallel to project to replace Aluminium with renewable polymers

Actions :

Regular meetings with suppliers. Action plan made for ASI certification of Elopak. Defined project in R&D department on Alu-free cartons. Beta-site currently in evaluation

Cross-cutting actions related to management of negative impact:

Describe cross-cutting actions to cease, prevent or mitigate negative impacts, including in your supply chain

3.B.1 Reduction of environmental and climate footprint

Elopak started to systematically report on environmental impact in 2008. Reducing energy consumption, improving efficiency and sourcing renewable electricity has led to an 70% reduction in company emissions since 2008. Elopak was the first packaging company to join the RE100 campaign and has been sourcing 100% renewable electricity since 2016 for all Elopak sites. This is done by buying guarantee of origin certificates (GO's) for renewable electricity in Europe, and renewable energy certificates (RECs) in North-America.

Elopak's "net zero" focus means not only continuously reducing the negative externalities (footprint) from our products and production, but also increasing the positive externalities (handprint) by supporting projects with several sustainable benefits for our planet and people. Elopak is committed to keeping the global temperature increase below 1,5 degrees through the "Our Only Future" campaign by UN Global Compact. We do this by setting strict Science Based Targets for emission reduction from our own production as well as our products. The targets are scientifically calculated and approved by the Science Based Targets initiative. This new commitment aims for a 55% reduction in Elopak's 2017 level of emissions by the year 2030. We also commit to continue purchasing renewable electricity, and to reduce emissions from our value chain by 16%.

We also have initiatives to reduce our waste and optimizing our production and transport. Although there is always potential to improve and reduce, emissions cannot be completely eliminated. That's why Elopak is compensating for our remaining emissions through carbon neutrality. After years of reducing Elopak's greenhouse gas emissions by way of energy efficiency and phasing in renewable energy, there are still residual emissions which cannot be reduced to zero. Examples include emissions from the transport of raw materials and finished goods, as well as emissions from business travel. In order to get to zero, Elopak supports projects outside of the value chain, that can provide third-party verified carbon emission reduction credits. In doing so, we are contributing not only to reduced emissions but also facilitating positive effects on local livelihoods and the environment. Currently Elopak supports two projects, the Rimba Raya project that protects rainforest and the orangutan in Borneo and the Kenya improved cookstoves project (more information on the Elopak website). The carbon neutral certification is in accordance with The CarbonNeutral Protocol and PAS2060 and has been verified by an independent third-party, Anthesis Consulting Group.

To calculate carbon footprint, Elopak has an internal calculation tool, DEEP - Dynamic Elopak Environmental Performance, which is verified by a third party annually. The tool can calculate the cradle to gate emission for every type of Elopak carton. The tool considers emissions connected to the production of raw materials, as well as Elopak's own operations including final conversion, and all transportation up to the delivery at Elopak's customers'. Emission factors for our raw materials, provided by our suppliers, are included in DEEP, and we always encourage our suppliers to work to reduce the CO₂e emissions associated with the materials.

3.B.2 Adapting own purchasing practices (sourcing)

We have in 2020 improved our focus and our Supplier Assessment framework by entering into agreement with Ecovadis as our main risk assessment platform/tool (common tool in our industry) towards our suppliers. The first assessment campaign launched in April targeted our key suppliers delivering raw materials in addition to other critical materials and services to our core business. Corrective Actions Management and continuous follow up of the suppliers performance and improvements is carried out as an ongoing tasks performed by the Category and Purchasing Manager with central support where needed.

In parallel we have also improved our own framework and updated our Supplier Assessment Questionnaire (SAQ) to better consider Social and Environmental factors and the suppliers compliance to our Supplier Code of Conduct. This SAQ will be used for qualification and performance monitoring purposes as a complementary to Ecovadis assessment which will mainly focus on critical suppliers as a start.

We are currently also updating the overall Procurement Policy and Procedure (will be ready in Q1 2021 and implementation thereafter) to even further clarify processes, roles and responsibilities.

3.B.3 Choice of product design and of raw materials

Elopak cartons consist of on average 75% paperboard. As our main raw material is derived from forests, we take responsible forest management seriously. Forests are naturally renewable since trees grow relatively quickly without human interference. However, forests are only renewable if they are managed responsibly. Elopak source all paperboard from legal and acceptable sources in accordance with the standards of the Forest Stewardship Council™ (FSC™). Trees play an important role in the carbon cycle. During their growth, trees absorb carbon dioxide (CO₂) from the atmosphere and produce oxygen. The destruction and degradation of forests worldwide leads to an increase of the atmospheric CO₂ concentration and is devastating to the climate and the planet.

In addition to paperboard, Elopak cartons also consist of plastic (polyethylene) and has a closure made of polyethylene. In 2014 Elopak started to source renewable polyethylene to be able to offer a carton made of 100% renewable material. In Elopak we offer certified renewable plastics from two different sources. Our recommended solution is sourced from Nordic forests, the tall oil based feedstock allows Elopak to offer a carton based entirely on wood. The forest based feedstock, tall oil, is a residue from pulp and paper production. The wood is sourced 100% from responsibly managed forests and other controlled sources, in accordance with the FSC™ certification system. The plant based feedstock is sourced from Brazil, where sugar cane can grow in areas where other crops cannot. Sugar cane also proves one of the most efficient plants in converting sunlight to energy and hence is a highly sustainable, fast-growing renewable resource. We ensure that both the forest based feedstock and the sugar cane is certified according to ISCC PLUS.

Aluminium is used in some carton types as a barrier to protect the product inside. Elopak is working to replace aluminium with a renewable alternative, and a defined project on this has been run in 2020, to be initiated with a Beta Site customer in 2021. In parallel, we are working with our aluminium suppliers to secure ASI certified aluminium, which ensures that the mining and production practices are in line with key social, ethical and environmental standards.

Beverage cartons protect the food inside, but they don't just stop being useful at the 'end' of their life. They can gain a new lease of life when collected and recycled into new products. Elopak strongly promotes beverage carton recycling, which turns valuable resources into useful secondary materials. Thereby ensuring resource-efficiency and more circular economy. In this way, we are keeping materials in the loop as long as possible, minimizing our impact on the environment. One of the key elements of circular economy thinking is 'designing-out waste' right at the beginning of the product inception phase. That's what the Pure- Pak® carton is all about. By having 'easy-to-fold' lines which make it easier to squeeze out more of the product remnants, we can reduce food waste. In addition, the folded cartons reduce waste volume.

3.B.4 Actively support free trade union organisation and collective bargaining, or where the law does not allow it, actively support other forms of democratically elected worker representation.

To maintain good relations and communication with trade unions, Elopak has maintained an EWC agreement since 1996. The workings of this forum are regulated by an agreement between the Board of Directors and representatives of the Norwegian unions, signed in 1996 and renewed each year since then.

The EWC delegates meet once a year. Delegates raise issues with top management, and receive information concerning the development of the company.

A Working Party, elected by the EWC, meets frequently to set the agenda and follow-up the issues discussed at the annual meeting. The Working Party also has bi-monthly updates in skype/phone conferences with management.

3.B.5 Contribute to development, capacity building and training of suppliers and workers in the supply chain:

Continued Introduction to Responsible Sourcing has been conducted for Procurement/purchasing employees. In addition, the topic is an integral part of agendas with suppliers. Both as follow up of assessment results and areas of improvement but also as joint development initiatives in certain areas (product/material development, improvements etc).

3.B.6 Other plans and measures taken to deal with salient issue



4

Track implementation and results

Tracking implementation of actions and results is key to the company's due diligence process. For example, is the identifying and prioritisation of salient issues done in a scientifically sound and credible way? Does it reflect real conditions in the supply chain? Do measures aimed at ceasing, preventing and reducing the company's negative impact work as intended? Is negative impact remediated where relevant? This may apply to actions taken by the company alone or carried out in collaboration with others. Companies must have procedures and systems to track their implementation and results in order to assess them. The company's experience with due diligence is used to improve processes and results in the future.

4.A Monitoring and assessment

4.A.1 Describe responsibilities and procedures within the company for tracking performance with respect to due diligence activities

Elopak conducts Integrity due diligence review of business partners or other stakeholders with a risk-based approach.

We are in the process of developing a procedure and implementing a company-wide process for Business Partner Integrity Due Diligence. The purpose of this procedure is to set out requirements to ensure that adequate level of risk assessment and risk mitigation is performed on the background and profile of potential new or existing business partners or other stakeholders when evaluating whether they meet Elopak's compliance and integrity standards and may be engaged with.

Our Integrity risk management (IRM) is a process of assessing integrity of potential new or existing business partners or other stakeholders through an assessment review called Integrity Due Diligence (IDD). In an IDD review, a business partner or a stakeholder is analyzed to identify potential integrity and compliance concerns with the purpose to mitigate compliance and reputational risks for Elopak.

Potential integrity and compliance concerns and risks may relate to:

- corruption,
- violations of international sanctions,
- other economic crimes (e.g. money laundering, terror financing),
- human rights violations as well as
- environmental breaches

Integrity risk management is an integral part of Elopak's work to combat corruption and respect human rights. Relevant business partners or other stakeholders are categorized depending on their proximity and type of association to Elopak which is a significant factor in determining if and to what degree they may pose a potential reputational or legal risk for Elopak.

Main business partner categories included in this process are: suppliers, customers, agents/ intermediaries, JV partners.

The scope and content of an Integrity due diligence review will need to be tailored for each individual case proportional to the inherent risk involved.

Typically risk mitigation actions include:

- inclusion of adequate contractual clauses including provisions allowing for contract termination if certain risks materialize themselves or agreed mitigation plan does not take place, as well as audit rights
- attachment of the Elopak's Supplier Code of Conduct,
- use of compliance self-assessment questionnaire
- outline of an audit plan or
- direct follow up of specific issues with Legal and Compliance representatives of the business partner.

For Supplier due diligence we track and keep an overview of assessment results on Ecovadis platform. In addition we have a central structure (SharePoint based shared folder system for the procurement network and other internal key stakeholders) for storage of assessment documents and central excel files for keeping an overview of assessment results and status (Ecovadis assessment, Elopak Supplier Questionnaires, Supplier Code of Conduct engagement etc). We also make regular Category Strategy/Plan updates where status and key initiatives should also be included. It is the responsibility of each Category and Purchasing Manager to keeping the files up to date and make sure relevant documents are collected and stored centrally.

4.A.2 Describe how the company evaluates the effect of its own efforts, or those made by suppliers (and other business relations), to identify, prevent and mitigate salient issues

We have continuous dialogue with suppliers on relevant/identified environmental and social topics and continuously develop our practises and choice of products to try and minimize the negative effect identified. Elopak defined stakeholders and keep a close dialogue with them to ensure the defined salient issues are relevant from external and internal perspectives.

A woman with dark hair tied back, wearing a light blue button-down shirt and a brown leather apron, is looking down at a large, round, metal tray with several circular indentations. The background is a blurred kitchen setting.

5

Communicate how impacts are addressed

Relevant external communication on company due diligence for responsible business conduct needs to build on specific activities and results. This include external communication of policies and codes of conduct, or processes and activities related to identifying and managing the company's actual and potential negative impact on people, society and the environment. Communication should also include findings, effects and results of concrete actions or activities.

5.A External communication

5.A.1 Describe how the company communicates with affected stakeholders when managing its salient issues

This is defined in our Sustainability report as well as on our website: A safe work environment and Our code of conduct and ethical responsibility.

Elopak has zero tolerance for bribes and corruption and other illegal or unethical business conduct and requires the same from its suppliers and partners.

Employees are required to notify about suspected breaches of law of the Code of Conduct and other conditions where life and health are in danger.

Examples of conditions that should be notified:

- Violation of the law
- Danger to life and health
- Violation of the company's clearly communicated guidelines
- Emissions that pollute the environment
- Corruption
- Employees are bullied or frozen out
- Violation of tax rules
- Insider trading,
- Economic infidelity, embezzlement

In principle, everyone should be able to notify directly to their line manager or the body responsible for what is to be notified:

- All cases can be notified to the immediate superior.
- Personnel cases can be notified to HR, European Work Council, local union representatives, or through our whistleblower channel and Company Health Services.
- Environmental issues or poor working environment can be notified to the head of the local Working Environment Committee or our whistleblower channel
- Violation of tax / corruption rules can be notified to Finance or our whistleblower channel

All cases can also be submitted anonymously via Elopak whistleblower on our web site.

Elopak has entered a service agreement with external expert company KPMG Norway to handle any report made through the whistleblower channel. The service provided by KPMG ensures that Elopak employees and external stakeholders can report their concerns confidentially. KPMG will safeguard the reporter's anonymity unless they want to reveal their identity.

The whistleblower form is available in English, Spanish, Norwegian, Danish, French, German, Russian and Dutch. Elopak has a policy of no retaliation or adverse action or reprisal against the person who made a report in good faith.

Elopak also provides input with regards to status on People (Health & Safety/People & Organization/Ethics) Planet and Profit activities to Elopak Board of Director's report every year.

5.A.2 Describe how the company communicates publicly about its own work on identifying and management of salient issues

Elopak publishes an annual sustainability report with key data within all sustainability areas (people, planet and profit). The report for 2020 is not yet ready but will aim to be GRI compliant. We report on indicators such as; diversity, training, percentage increase/decrease in energy intensity in production, carbon footprint of an average Elopak PE carton, total greenhouse gas emissions, percentage of cartons that are made with renewable polyethylene and percentage of cartons made from FSC certified paperboard. By publishing this data, Elopak is transparent about progress and the work that is done.

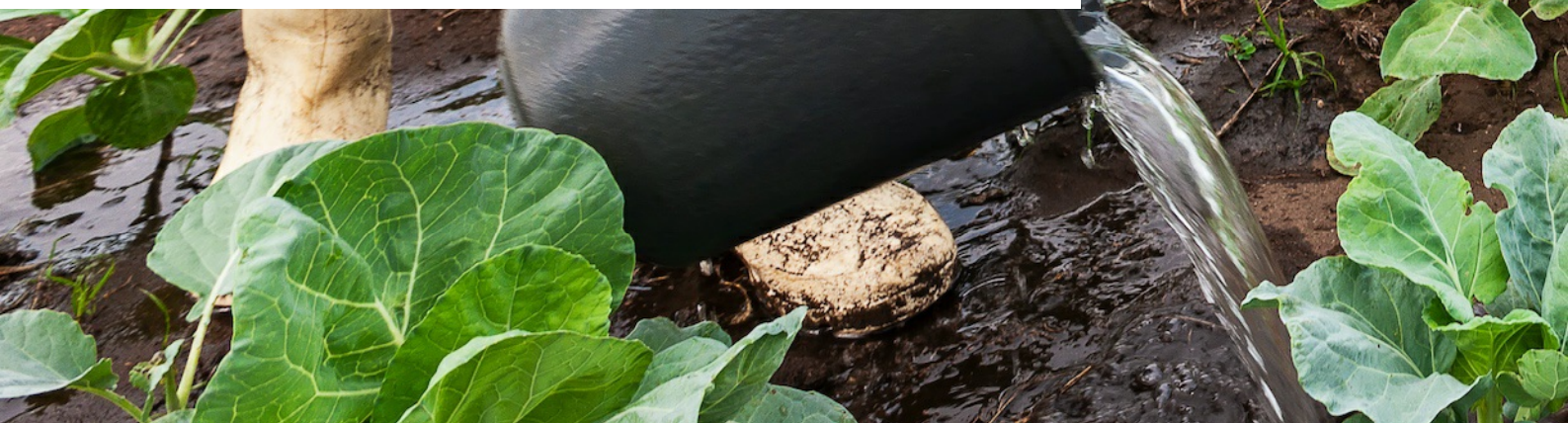
The reports are published on our website and shared with customers, suppliers, banks and other stakeholders in various meetings.



6

Provide for or cooperate to ensure remediation when appropriate

Once a company has identified that it has caused or contributed to negative impact on people, society or the environment, the company must provide for, or cooperate to ensure remediation. Remediation may involve financial compensation, a public apology or other ways to remediate the negative impact. When appropriate, companies should provide for or cooperate with legitimate remediation mechanisms through which impacted stakeholders and rights holders can raise complaints.



6.A Remediation

6.A.1 Describe the company's policy for remediation of negative impacts on people, society and the environment

Corporate Crisis Management in Elopak

The aim of crisis management activity is to ensure that any extraordinary or emergency situation that may occur throughout the organization is well managed to minimize potential harm and to reassure our stakeholders, both internal and external, that they can trust and have confidence in Elopak.

Crisis management deals with providing the best response to crisis;

- Misconduct such as corruption, fraud, environmental non-compliance, harassment etc.
- Third-party misconduct relating to e.g. child labour, trafficking, environmental damage in the value chain etc.
- Environmental damage due to Elopak activity
- Food safety or customer crisis relating to Elopak products
- Cyber-attack or major IT systems outage
- External threats to Elopak employees such as kidnap and ransom
- Negative publicity due to public outcry (strike, demonstration, social media storm etc.)
- Sudden changes in framework conditions threatening license to operate
- Other potential crises not covered by specific crisis management documents.

It requires a mindset and ability to think of the worst-case scenario while simultaneously suggesting numerous solutions, skills and techniques required to identify, assess, understand and cope with a serious situation.

Crisis management typically follows a process from discovery and classification, activation of crisis management teams, assessment and decisions and the crisis communication needed to contain the situation. Elopak has worked out procedures and templates for how Elopak shall handle each step in this process in case of crisis and have carried out 3 Table Top Training sessions in Elopak Units this year and have a plan for further sessions this year.

Elopak also follows up any cases that have been submitted anonymously via Elopak Whistleblower channel on our web site. There are no retaliation or adverse action or reprisal against the person who made a report.

6.A.2 Describe cases of remediation in reporting year, if relevant

Elopak has followed up all cases/worked out corrective actions vs. cases that have been submitted through the Elopak Whistle-blower channel (confidential information).

Elopak is reporting Global Safety and Sick-leave numbers to the BoD in every BoD meetings throughout the year. Corrective actions with focus on health and safety activities for managing a healthy and proper business environment are carried out in cooperation with the HR/HSE organization and relevant line managers.

Please see Health Safety and Working Environment - procedure.

6.B Secure access to grievance mechanisms

6.B.1 Describe what the company does to ensure that workers and communities have access to effective remediation mechanisms, when appropriate:

Elopak respects the rights of employees to form and join trade unions of their choice. Elopak has frequent meetings with the European Work Council and local trade unions at sites in order to discuss the overall working environment/receive any feed-back for keeping a healthy and proper working environment.

Please see chapters 5.A.1 and 6.A.1. with regards to the Whistle-blower channel.

Contact details:

Elopak AS

Jeanette Berge Knutsen, Sustainability Specialist

jeanette.knutsen@elopak.com