

Pact Group Holdings Ltd  
ABN: 55 145 989 644

# Modern Slavery Statement 2024



# Pact entities covered in this Statement

Headquartered in Melbourne and listed on the ASX, Pact employs ~5,400 people in ~128 locations across 15 countries. Pact has four divisions that work as one across the circular economy.

This Modern Slavery Statement ("**Statement**") covers the activities of Pact Group Holdings Limited (ABN 55 145 989 644) ("**Pact Group Holdings**") (a reporting entity under the *Modern Slavery Act 2018* (Cth)) (the '**Australian Modern Slavery Act**') for the financial year ending 30 June 2024 ("**Reporting Period**"). This statement is also made pursuant to section 54(1) of the *UK Modern Slavery Act 2015* ("**UK Modern Slavery Act**").

This is a joint Statement that applies to Pact Group Holdings and the following group entities (that are also reporting entities for the purposes of the *Australian Modern Slavery Act* and/or the *UK Modern Slavery Act*):

Pact Group Holdings (Australia) Pty Ltd ACN 107 959 900  
Pact Group Industries (ANZ) Pty Ltd ACN 147 260 848  
Pact Retail Accessories (Australia) Pty Ltd ACN 626 801 045\*  
VIP Plastic Packaging Pty Ltd ACN 095 313 705\*\*  
Skyson Pty. Ltd. ACN 113 852 823  
Jalco Group Pty. Limited ACN 075 091 806  
Jalco Powders Pty Limited ACN 092 756 888  
VIP Steel Packaging Pty Ltd ACN 095 314 195  
Pact Group Industries (Asia) Pty Ltd ACN 166 188 058  
Davmar Investments Pty Ltd ACN 609 808 095  
Alto Packaging Limited NZBN 9429034028896  
VIP Plastic Packaging (NZ) Limited NZBN 9429035821724  
Pact Group (NZ) Limited NZBN 9429037054298  
Pact Group Holdings (NZ) Limited NZBN 9429031835831  
Pact Group Holdings (Hong Kong) Limited BRN 68533786  
Fast Star International Holdings Limited BRN 39269114  
Ningbo Xunxing Trade Co. Ltd CN 91330201684296569Y\*  
Asia Peak Pte. Ltd CRN 200800866E

as well as their controlled entities (as outlined in section 2 of this statement).

\* Reporting entity under the UK Modern Slavery Act only.

\*\* Reporting entity under both the Australian Modern Slavery Act and UK Modern Slavery Act.

For the purposes of this Statement, any reference to "**Pact**", "**we**", "**us**" or "**our**", "**the group**" or "**our group**" is a reference to each of the above reporting entities (and any entity controlled by the reporting entities).

# Pact's commitment

Pact recognises that modern slavery causes harm and occurs in various forms including servitude, human trafficking, forced labour, debt bondage, child labour, deceptive recruiting and forced marriage. Pact has a zero-tolerance approach to modern slavery and supports the need for organisations and individuals to take action to reduce and ultimately eradicate modern slavery practices globally.

The purpose of this Statement is to report on Pact's approach and actions taken to reduce the risk and harm of modern slavery in its operations and supply chain. This includes the evaluation and improvement of processes to identify, assess and ultimately remediate modern slavery risks in Pact's operations and supply chain. This Statement highlights the key activities we have undertaken during the Reporting Period to combat modern slavery across the group and in our supply chain.

One of Pact's core values is integrity. Pact is committed to the continuous and active improvement of processes to reduce the risk of all forms of modern slavery arising in its supply chain. Pact demonstrates high ethical standards in its operations and expects the same of its suppliers.

# Pact's structure, operations and supply chain

Pact Group Holdings is a publicly listed company, incorporated and domiciled in Australia under the *Corporations Act 2001* (Cth). The group is headquartered in Melbourne, Australia. Pact has approximately 5,400 employees across 128 locations, with operations in 15 countries around the world.

Pact's vision is to lead the circular economy through packaging, reuse and recycling solutions.

For the purposes of this Statement, the entities owned or controlled by the Pact reporting entities for the Reporting Period ('**controlled entities**') are as follows:

Australia		
Pact Group Industries (ANZ) Pty Ltd	Salient Asia Pacific Pty Ltd	VIP Plastic Packaging Pty Ltd
Packaging Employees Pty Limited	Brickwood (Dandenong) Pty Ltd	Jalco Care Products Pty Limited
Pact Group Holdings (Australia) Pty Ltd	Skyson Pty. Ltd.	VIP Steel Packaging Pty Ltd
Pact Retail Accessories (Australia) Pty Ltd	Brickwood (NSW) Pty Ltd	Jalco Cosmetics Pty. Limited
Pact Group Finance (Australia) Pty Ltd	Snopak Manufacturing Pty Ltd	Viscount Logistics Services Pty Ltd
Pascoe's Pty Ltd	Brickwood (QLD) Pty Ltd	Jalco Group Pty. Limited
Pact Group Industries (Asia) Pty Ltd	Steri-Plas Pty Ltd	Viscount Plastics (Australia) Pty Ltd
Plaspak Closures Pty Limited	Brickwood (VIC) Pty Ltd	Jalco Plastics Pty. Ltd.
Alto Manufacturing Pty Ltd	Sulo MGB Australia Pty Ltd	Viscount Plastics (China) Pty Ltd
Plaspak Management Pty Limited	Cingplast Plastop Australia Pty Limited	Jalco Powders Pty Limited
Alto Packaging Australia Pty Ltd	Summit Manufacturing Pty Ltd	Viscount Rotational Mouldings Pty Ltd
Plaspak Pty Limited	Davmar Investments Pty Ltd	Viscount Plastics Pty Ltd**
Astron Plastics Pty Limited	Sunrise Plastics Pty. Ltd.	Viscount Pooling Company Pty Ltd**
Power Plastics Pty. Limited	Inpact Innovation Pty. Ltd.	Viscount Pooling Systems Pty Ltd**
Australian Pharmaceutical Manufacturers Pty Ltd	Synergy Packaging Pty Ltd	Jalco Promotional Packaging Pty. Limited
Ruffgar Holdings Pty Limited	Jalco Australia Pty. Limited	Vmax Returnable Packaging Systems Pty Ltd
Baroda Manufacturing Pty Ltd	VIP Drum Reconditioners Pty. Ltd.	MTWO Pty Ltd
Jalco Automotive Pty. Limited		
New Zealand		
Pact Group Holdings (NZ) Limited	Alto Packaging Limited	Viscount Plastics (NZ) Limited
Pact Group Finance (NZ) Limited	Auckland Drum Sustainability Services Limited	Stowers Containment Solutions Limited
Pact Group (NZ) Limited	Tepak Industries Limited	Sulo (N.Z.) Limited
VIP Steel Packaging (NZ) Limited	Astron Plastics Limited	Pact Retail Accessories (New Zealand) Limited
VIP Plastic Packaging (NZ) Limited	Pacific BBA Plastics (NZ) Limited	Viscount FCC Limited**
Hong Kong		
Pact Group Holdings (Hong Kong) Limited	Pact Retail Accessories (Hong Kong) Limited	Talent Group Development Limited
Roots Investment Holding Private Limited	Pact Retail Accessories (Asia) Limited	Fast Star International Holdings Limited
China		
Pact Group Closure Systems (Tianjin) Co., Ltd	Dongguan Regent Plastic Products Co., Ltd	Langfang Viscount Plastics Co., Ltd*
Pact Group Packaging Systems (Guangzhou) Co., Ltd	Ningbo Xunxing Trade Co. Ltd	Pact Group Closure Systems (Guangzhou) Co., Ltd
Dongguan Top Rise Trading Co. Ltd	Guangzhou Viscount Plastics Co., Ltd*	
Bangladesh		
TIC Trading (Bangladesh) Limited	TIC Manufacturing (Bangladesh) Limited	TIC Industries (Bangladesh) Pty Ltd.
India		
Pact Closure Systems (India) Private Limited	AMRS Business Services Private Limited	
Indonesia		
PT Plastop Asia Indonesia	PT Plastop Indonesia Manufacturing	
South Korea		
Pact Group Closure Systems Korea Ltd		
Nepal		
Pact Group Closure Systems Nepal Private Limited		
Philippines		
Plastop Asia, Inc.	Pact Packaging Philippines Inc.	Pact Closure Systems (Philippines) Inc.
Singapore		
Asia Peak Pte. Ltd.		
United States of America		
Pact Retail Accessories (USA) LLC	Pact Group (USA), Inc*	
United Kingdom		
Pact Retail Accessories (UK) Limited		

\* Entities deregistered during the Reporting Period

\*\*Entities ceased to be controlled by Pact as at 1 December 2023.

# Pact's structure, operations and supply chain

## Packaging

'Pact Packaging' is a leader in sustainable rigid plastic packaging solutions differentiated through manufacturing, technical and innovation capability, and access to recycled materials. It is a market leader in rigid-plastic packaging in Australia and New Zealand, with a presence in Asia. The division is also a leader in select steel packaging products in Australia and New Zealand.

## Reuse

'Pact Reuse' is an integral product and service provider to major supermarkets, retailers and governments which provides sustainable and efficient supply chain solutions including retail garment hangers, fresh produce crates, intermediate bulk containers (IBCs), steel drums and wheelie-bins.

The division is also a leading Australian supplier of plastic materials handling products and custom moulded products for use in infrastructure and other projects.

## Recycling

'Pact Recycling' is a leading supplier of recycling and sustainability services in Australia and New Zealand.

## Contract Manufacturing

'Pact Contract Manufacturing' is a leading supplier of innovative contract manufacturing services for the home, personal care and health and wellness categories in Australia with manufacturing capability for liquid, powder, aerosol and nutraceutical products.

## Pact's Supply Chain

Pact's supply chain primarily comprises the purchase of resin and colourants, packaging, chemicals and steel. It also includes the purchase of transport and logistics, labour hire, machinery and equipment, maintenance and repair services, utilities and facilities related services such as cleaning, waste management and security, and professional services such as accounting, IT and legal services.



**PACT**  
PACKAGING

**PACT**  
REUSE

**PACT**  
RECYCLING

**PACT**  
CONTRACT MANUFACTURING

# Areas of risk

Pact has considered its supply chain and confirms that the group's supply chain remains relatively streamlined. This is due to the nature of our business as a supplier of sustainable packaging solutions and reuse and recycling solutions, with resin being a key raw material input for Pact's packaging division.

Due to this streamlined structure, Pact has increased visibility over its direct supply chains, thus the risk of modern slavery in Pact's direct supply chain is considered low. Pact acknowledges that modern slavery risks are present in its extended supply chain (including the supply chain of its controlled entities). Upon conducting a review from a geographical and industrial perspective, Pact identified that the majority of its procurement does not occur in industries or countries that typically carry a high risk of modern slavery.

Pact is conscious of the modern slavery risk associated with sourcing individuals for temporary/casual labour. Although this only accounts for approximately 6% of Pact's expenditure with third

parties, Pact aims to mitigate this risk in Australia and New Zealand by ensuring that at least 85% of our expenditure in this area is concentrated across three reputable providers who have appropriate anti-slavery processes in place.

Pact engages with over 6000 suppliers annually. As demonstrated below, Pact sources almost 80% of its inputs from countries that carry a low risk of modern slavery according to the Global Slavery Index<sup>1</sup>. Pact is committed to making a conscious effort to continue working with countries that place high value on ethical labour and human rights.

In all countries in which Pact operates, materials and labour hire are sourced locally wherever practicable. By sourcing from within the regions in which its businesses are operating, Pact has greater visibility over the organisational structure, processes and practices of its suppliers and is better placed to monitor their activities. This also ensures that Pact is well positioned to identify suppliers whose values and approach to modern slavery align with Pact's expectations.

Pact Source of Supply – Country	% of FY24 Spend	Risk Rating
Australia**	63%	Low
New Zealand**	12%	Low
China*	6%	High
Singapore*	5%	Moderate
Thailand***	2%	High
United States of America*	1%	Low
South Korea*	<1%	Low
Italy	<1%	Low
Philippines**	<1%	High
Germany	<1%	Low
United Arab Emirates	<1%	Low
Saudi Arabia	<1%	Low
India*	<1%	Moderate
Japan	<1%	Low
Hong Kong*	<1%	High
United Kingdom*	<1%	Low
Indonesia**	<1%	Moderate
Canada	<1%	Low
Netherlands	<1%	Low
Austria	<1%	Low
Nepal*	<1%	Moderate
Czech Republic	<1%	Low
Malaysia	<1%	Moderate
Taiwan	<1%	Low
Denmark	<1%	Low
Switzerland	<1%	Low
Belgium	<1%	Low
France	<1%	Low
Suriname	<1%	Low
Ireland	<1%	Low
Spain	<1%	Low
Vietnam	<1%	Moderate
Mexico	<1%	Low
Barbados	<1%	Low
Turkey	<1%	Moderate
Sri Lanka	<1%	Low
Greece	<1%	Low
Bahrain	<1%	Low
Qatar	<1%	Low
Bangladesh*	<1%	Moderate

<sup>1</sup> <https://www.globalslaveryindex.org/>, Walk Free Foundation

\*Pact has operations in these countries.

\*\*Pact has operations in these countries both wholly owned and through joint ventures.

\*\*\*Pact has operations in these countries through joint ventures.

# Pact's actions

This section of the Statement explores the actions taken by Pact during the Reporting Period to assess and address the risks identified above.

Pact is a signatory to the United Nations Global Compact and upholds its 10 principles, including those in relation to human rights and labour. During the Reporting Period, Pact took a number of actions to improve its management of modern slavery risk in accordance with the group's zero-tolerance approach to modern slavery.

## Integrity and Ethical Sourcing Committee

Pact's Integrity and Ethical Sourcing Committee ('Committee') continues to meet quarterly to:

- evaluate risks and make recommendations as to appropriate actions to be taken in the event that modern slavery risk is identified in Pact's business or supply chain;
- monitor current processes in place to identify new opportunities to improve Pact's approach to managing modern slavery risks across its operations;
- develop measures to assess and address modern slavery through due diligence and contractual obligations;
- develop appropriate training materials for Pact's employees and where appropriate, suppliers;
- address other issues including anti-bribery and corruption risk, sanctions and ethical supply chain management; and
- promote initiatives to further identify and minimise ethical risks to our operations.

The members of the Committee during this Reporting Period include:

- the Executive General Manager: Supply Chain;
- the Executive General Manager: Pact Packaging Australia & Asia;
- the Executive General Manager: Pact Retail Accessories;
- the group Chief Financial Officer;
- the General Manager of Procurement;
- the General Manager of Assurance and Financial Control;
- the Group Manager Employee Relations; and
- the General Counsel and Company Secretary.

Pact's Modern Slavery Contact Officer also sits on the Integrity and Ethical Sourcing Committee.

## Training

In the Reporting Period Pact continued its internal modern slavery training program by conducting refresher training for relevant employees. The training comprised a short video which outlined key modern slavery concepts and the importance of Pact's Modern Slavery Policy. This training now forms part of Pact's employee induction pack to ensure all new starters are informed of the risks of modern slavery.

## Due diligence

In the engagement of significant suppliers, Pact's process is to conduct tenders and requests for proposals which require participation in a due diligence process. The due diligence process varies by jurisdiction but generally includes completion of Pact's Modern Slavery Supplier Questionnaire, confirmation of compliance with our Modern Slavery Policy and Supplier Code of Conduct, and provision of details in relation to all proposed subcontracting and outsourcing arrangements. Through the information provided, Pact is able to assess which suppliers align with our ethical values.

Pact's supplier management platform requires suppliers at the on-boarding stage to confirm their compliance with Pact's Modern Slavery Policy and complete Pact's Modern Slavery Supplier Questionnaire. During the Reporting Period, Pact has continued to expand the use of its supplier management platform across the organisation. Pact has also continued to explore third party solutions to enable it to better, and more comprehensively, assess supplier risk and identify high risk suppliers. This included meeting with providers of third party solutions to assess the solutions available to the market.

Pact has implemented a more stringent process with stricter modern slavery requirements for ongoing high value suppliers (compared with one-off and low value suppliers).

Any significant modern slavery risks identified through supplier due diligence processes or other channels are reported to the Integrity and Ethical Sourcing Committee.

Pact's procurement team has kept abreast of specific developments in relation to modern slavery risks relevant to Pact's largest and most strategically significant suppliers.

## Policies

Pact's Modern Slavery Policy ('**Policy**') applies to all individuals who work for or on behalf of Pact, in any capacity, including employees, agency workers, contractors, consultants and any other third-party representative ('**Pact Personnel**'). The Policy has the purpose of educating all Pact Personnel about the Australian Modern Slavery Act, the risks of modern slavery and the responsibilities of Pact Personnel with respect to modern slavery. The Policy evidences Pact's commitment to acting ethically and our efforts to address, mitigate and prevent modern slavery in our operations, supply chain and business dealings.

The Policy is supported by a broad range of policies that underpin Pact's commitment to the highest ethical standards and supports our commitment to reduce the risk of modern slavery in Pact's operations and supply chain. Other policies which together provide a framework for ensuring our workforce, operations and supply chain are managed in an ethical, socially responsible and compliant manner include Pact's Anti-bribery & Corruption Policy, Code of Conduct, Global Procurement Policy, Supplier Code of Conduct and Whistleblower Policy.

## Supply chain management

Pact's standard agreements for the procurement of goods and services contain provisions including:

- a. requirements that Pact's suppliers act in an ethical and socially responsible manner;
- b. requirements that Pact's suppliers become signatories to and adhere to the principles of the United Nations Global Compact;
- c. requirements that Pact's suppliers comply with Pact's applicable policies and codes of conduct;
- d. warranties that Pact's suppliers will ensure that no forced labour, slavery, servitude or similar practices are in any way involved in the supply of goods or services to Pact;
- e. warranties that Pact's suppliers will maintain appropriate policies and procedures to ensure compliance with the modern slavery legislation;
- f. warranties that Pact's suppliers will supply all information and evidence reasonably requested by Pact to demonstrate compliance with the above;
- g. the right for Pact or an independent auditor appointed by Pact to audit the supplier to verify the supplier's compliance with its warranties;
- h. the right for Pact to terminate agreements with suppliers on the basis that the supplier has not complied with its obligations in relation to modern slavery;
- i. prohibitions on outsourcing without oversight as to the employment conditions of the contractor or subcontractor; and
- j. prohibitions on subcontracting the provision of goods or services without Pact's prior written consent.

Where contracts are entered into with significant suppliers that are not on Pact's standard terms, customised provisions addressing modern slavery risks are incorporated into the relevant contract in addition to the acknowledgment of compliance to Pact's Modern Slavery Policy required as part of the supplier onboarding process.



# Assessing effectiveness of Pact's actions

Currently, Pact assesses the effectiveness of its actions through various avenues:

1. Integrity and Ethical Sourcing Committee – the Committee is committed to reviewing, monitoring and improving our current actions taken to address and assess modern slavery.
2. Modern Slavery Supplier Questionnaire – we are improving our ability to measure the substance and extent of responses received to assess which suppliers are implementing modern slavery measures to mitigate risk (if any).
3. Supplier Management System – enables Pact to aggregate data and the measure effectiveness of its actions (such as summarising data on supplier risk levels and suppliers that have not agreed to comply with Pact's modern slavery requirements).

4. Training – modern slavery training has resulted in a demonstrable increase in the level of awareness of relevant Pact employees regarding modern slavery risks and issues.

5. Procurement Team Feedback – we receive continuous feedback from our procurement team in relation to our training and onboarding processes in relation to our actions to cease any engagement with high-risk suppliers.

## Ongoing risk assessment

In this Reporting Period, Pact continued to assess our suppliers' compliance with our modern slavery requirements. Pact continues to expand the scope and depth of its treatment towards any stakeholders carrying risk of modern slavery.

# Consultation

This joint Statement has been prepared by Pact's management in consultation with senior leaders, staff, and directors from each reporting entity covered by this joint Statement.

# Pact's future focus

## Supplier due diligence management

Pact will continue to work towards selecting and implementing a supplier due diligence and management solution with the aim of streamlining the due diligence and onboarding process of suppliers and providing a more robust framework to assess the risks associated with suppliers across the group, including modern slavery risks. Pact intends to release a tender inviting potential third party supplier due diligence and management solution providers to submit details and pricing for a proposed solution which addresses Pact's needs.

## Supplier training

Pact proposes to conduct training of key suppliers by issuing communications on modern slavery risk and Pact's expectations.

# Collaboration and engagement

This statement is made on behalf of the reporting entities within the group including owned and controlled entities. This statement was developed in consultation with the Integrity and Ethical Sourcing Committee and with input from a range of teams and functions including Pact's supply chain team.

This Statement has been reviewed, considered and approved by the Board of Pact Group Holdings Limited. It was approved by the Board on 18 December 2024.

Signed,



**Sanjay Dayal**  
Managing Director and Group CEO  
Pact Group Holdings Ltd

An aerial photograph of a coastline with a large teal circle overlay. The text "Leading the circular economy" is centered within the circle in white. The background shows a mix of dark blue water and lighter blue land with some vegetation.

# Leading the circular economy

Our promise is to create a better  
and more prosperous world all round.  
That's our future Pact.

Let's lead the  
way together.

[www.pactgroup.com](http://www.pactgroup.com)

