

Pact Group Holdings Ltd
ABN: 55 145 989 644

Modern Slavery Statement 2025



Pact entities covered in this Statement

Headquartered in Melbourne, Australia, Pact employs ~5,230 people in ~120 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 Ltd (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 2025 (**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 Australia Pty. Limited ACN 075 091 833
Jalco Group Pty. Limited ACN 075 091 806
VIP Steel Packaging Pty Ltd ACN 095 314 195
Astron Plastics Pty Limited ACN 151 143 252
Pact Group Industries (Asia) Pty Ltd ACN 166 188 058
Davmar Investments Pty Ltd ACN 609 808 095
Pact Group Holdings (Hong Kong) Limited BRN 68533786
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
Fast Star International Holdings Limited BRN 39269114
Ningbo Xunxing Trade Co. Ltd CN 91330201684296569Y*

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 minimise modern slavery practices locally and 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 business dealings, 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 identify and 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 public company*, incorporated and domiciled in Australia under the *Corporations Act 2001* (Cth). The group is headquartered in Melbourne, Australia. Pact has approximately 5,230 employees across 120 locations, with operations in 15 countries around the world.

Pact's vision is to lead the circular economy by delivering scaled circular solutions through reuse and recycling; packaging; and consumer products.

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	Jalco Automotive Pty Limited	Skyson Pty Ltd.
Pact Group Holdings (Australia) Pty Ltd	Jalco Care Products Pty Limited	Snopak Manufacturing Pty Ltd
Pact Group Finance (Australia) Pty Ltd	Jalco Cosmetics Pty. Limited	Steri-Plas Pty Ltd
Pact Group Industries (Asia) Pty Ltd	Jalco Group Pty. Limited	Sulo MGB Australia Pty Ltd
Alto Manufacturing Pty Ltd	Jalco Plastics Pty. Ltd.	Summit Manufacturing Pty Ltd
Alto Packaging Australia Pty Ltd	Jalco Powders Pty Limited	Sunrise Plastics Pty. Ltd.
Astron Plastics Pty Limited	Jalco Promotional Packaging Pty. Limited	Synergy Packaging Pty Ltd
Australian Pharmaceutical Manufacturers Pty Ltd	MTWO Pty Ltd	VIP Drum Reconditioners Pty. Ltd
Baroda Manufacturing Pty Ltd	Pact Braeside Pty Ltd (formerly Viscount Plastics (Australia) Pty Ltd)	VIP Plastic Packaging Pty Ltd
Brickwood (Dandenong) Pty Ltd	Pact Retail Accessories (Australia) Pty Ltd	VIP Steel Packaging Pty Ltd
Brickwood (NSW) Pty Ltd	Pascoe's Pty Ltd	Viscount Logistics Services Pty Ltd
Brickwood (QLD) Pty Ltd	Plaspak Closures Pty Limited	Viscount Plastics (China) Pty Ltd
Brickwood (VIC) Pty Ltd	Plaspak Management Pty Limited	Viscount Rotational Mouldings Pty Ltd ¹
Cingplast Plastop Australia Pty Limited	Plaspak Pty Limited	Vmax Returnable Packaging Systems Pty Ltd
Davmar Investments Pty Ltd	Power Plastics Pty. Limited	Packaging Employees Pty Limited
Impact Innovation Pty. Ltd.	Ruffgar Holdings Pty Limited	
Jalco Australia Pty. Limited	Salient Asia Pacific Pty Ltd	
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	
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
Indonesia		
PT Plastop Asia Indonesia	PT Plastop Indonesia Manufacturing	
South Korea		
Pact Group Closure Systems Korea Ltd		
China		
Pact Group Closure Systems (Guangzhou) Co., Ltd	Pact Group Packaging Systems (Guangzhou) Co., Ltd	Dongguan Regent Plastic Products Co., Ltd
Pact Group Closure Systems (Tianjin) Co., Ltd	Dongguan Top Rise Trading Co. Ltd	Ningbo Xunxing Trade Co. Ltd
Bangladesh		
TIC Trading (Bangladesh) Limited ²	TIC Manufacturing (Bangladesh) Limited	TIC Industries (Bangladesh) Pty Ltd.
India		
Pact Closure Systems (India) Private Limited	AMRS Business Services Private Limited	
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		
United Kingdom		
Pact Retail Accessories (UK) Limited		

*Until 16 July 2025, Pact Group Holdings was listed on the Australian Securities Exchange.

¹ Entity ceased to be controlled by Pact as at 31 December 2024.

² In voluntary liquidation.

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, Intermediate Bulk Containers, steel drums and wheelie-bins.

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.



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. Upon conducting a review from a geographical and industry perspective, Pact identified that the majority of its procurement does not occur in industries or countries that are estimated to have a high prevalence of modern slavery according to the Global Slavery Index¹.

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 5000 suppliers annually. As demonstrated below, Pact sources the majority of its inputs from countries with a low estimated prevalence of modern slavery. Pact is committed to making a conscious effort to prioritise 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 commercial and 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 FY25 Spend	Estimated Prevalence of Modern Slavery
Australia**	55%	Low
New Zealand**	14%	Low
China*	7%	Low
Singapore*	6%	Low
Thailand***	3%	Moderate
Philippines**	2%	Moderate
United States of America*	1%	Low
Hong Kong*	1%	Low
South Korea*	<1%	Low
Italy	<1%	Low
Germany	<1%	Low
United Arab Emirates	<1%	High
Saudi Arabia	<1%	High
India*	<1%	Moderate
Japan	<1%	Low
United Kingdom*	<1%	Low
Indonesia**	<1%	Moderate
Canada	<1%	Low
Netherlands	<1%	Low
Austria	<1%	Low
Nepal*	<1%	Low
Czech Republic	<1%	Low
Malaysia	<1%	Moderate
Taiwan	<1%	Low
Denmark	<1%	Low
Switzerland	<1%	Low
Belgium	<1%	Low
France	<1%	Low
Suriname	<1%	Unrated
Ireland	<1%	Low
Spain	<1%	Low
Vietnam	<1%	Low
Mexico	<1%	Moderate
Barbados	<1%	Unrated
Turkey	<1%	High
Sri Lanka	<1%	Moderate
Greece	<1%	Moderate
Bahrain	<1%	Moderate
Qatar	<1%	Moderate
Bangladesh*	<1%	Moderate

¹ <https://www.walkfree.org/global-slavery-index/map>, Walk Free Foundation as at 17 December 2025

*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 relating 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 policies and 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 the Reporting Period include:

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

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

Training

In the Reporting Period Pact enhanced its modern slavery training program by issuing to all suppliers a training publication outlining key modern slavery concepts and the importance of compliance with Pact's Modern Slavery Policy.

Pact continues to provide induction training to all new employees informing them of the risks of modern slavery and the importance of compliance with Pact's Modern Slavery Policy.

Due diligence

In the Reporting Period Pact conducted a tender for a third party supplier due diligence management solution with the aim of streamlining the supplier due diligence and onboarding process and providing a more robust framework to assess the risks associated with suppliers across the group, including modern slavery risks. Pact rigorously assessed all tender submissions on a range of metrics including the ability to screen suppliers on modern slavery risks based on legal and regulatory action, media monitoring and inherent risk factors. Following the tender process, Pact selected a third party provider and has commenced implementation of the solution. The solution will integrate with Pact's existing supplier management platform and provide a single source of truth for suppliers. In addition to screening suppliers on modern slavery risks, the selected solution assesses other risks (including financial risks, legal and regulatory breaches, and environmental risks) and conducts sanctions screening.

During implementation of the third party supplier due diligence management solution, and when engaging significant suppliers, Pact continues 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 existing supplier management platform requires suppliers at the onboarding stage to confirm their compliance with Pact's Modern Slavery Policy and complete Pact's Modern Slavery Supplier Questionnaire. During the Reporting Period, Pact continued to expand the use of its supplier management platform across the organisation.

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.

In the Reporting Period Pact reviewed and updated the Policy to incorporate a minimum age requirement for Pact employees. The updated Policy was communicated to all Pact Personnel and suppliers (refer Training section above). The Policy is supported by a broad range of policies that underpin Pact's commitment to high 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 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 the effectiveness of Pact's actions

Currently, Pact assesses the effectiveness of its actions through:

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 capacity to identify which suppliers are strengthening modern slavery risk mitigation measures.
3. Supplier Management System - helps Pact aggregate data and measure the effectiveness of our 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 Personnel regarding modern slavery risks and issues, and has been extended to suppliers.

5. Procurement Team Feedback - we receive continuous feedback from our procurement team in relation to our training and onboarding processes.

Ongoing risk assessment

In this Reporting Period, we continued to assess our suppliers' compliance with our modern slavery requirements. Pact continues to expand the scope and depth of its treatment of stakeholders carrying risk of modern slavery. The ability to assess risk of modern slavery will be enhanced through Pact's new supplier due diligence solution.

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 has commenced implementation of the selected third party supplier solution with go-live expected during the FY26 reporting period. The solution has the aim of streamlining the due diligence and onboarding process of suppliers and providing a more robust framework to better assess the risks associated with suppliers across the group, including modern slavery risks. The solution will allow for regular monitoring of suppliers, including changes to risk ratings in addition to screening during the onboarding process.

Supplier training

Pact proposes to conduct further training of key suppliers by issuing communications on modern slavery risk and Pact's expectations in local languages. The implementation of the supplier due diligence solution will also provide a mechanism for better communication with suppliers including audit requirements.

Responsible sourcing policy

In the next reporting period Pact will develop a responsible sourcing policy to ensure that Pact prioritises selection of suppliers who are aligned with Pact's values and demonstrate strong standards in relation to labour practices, human rights, ethics, governance, environment and sustainability.

Collaboration and engagement

This joint Statement is made on behalf of the reporting entities within the group including owned and controlled entities. This joint 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 joint Statement has been reviewed, considered and approved by the Board of Pact Group Holdings. It was approved by the Board on 23 December 2025.

Signed,

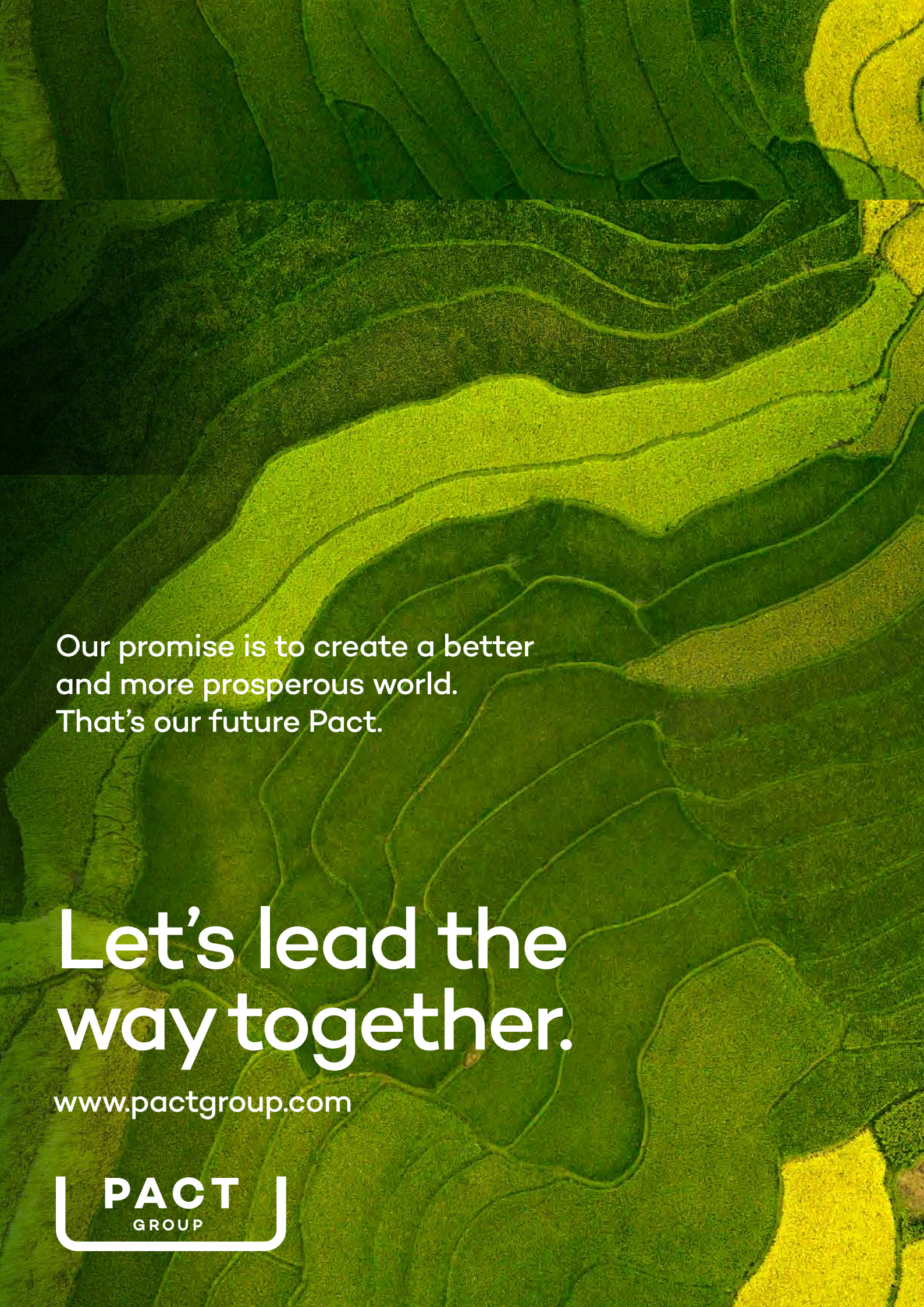


Sanjay Dayal

Managing Director and Group Chief Executive Officer
Pact Group Holdings Ltd

An aerial photograph of a dense forest with a circular overlay in the center. The overlay is a semi-transparent circle with a darker blue tint, and the text 'Leading the circular economy' is written in white inside it. The background shows a vast expanse of green trees from a high angle.

Leading the circular economy



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

Let's lead the
way together.

www.pactgroup.com

