

# PACTIV CANADA INC.

## Supply Chains Act Report (2024)

### **1. About This Report**

The following report is prepared and filed by Pactiv Canada Inc. ("Pactiv Canada") pursuant to the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act")* for the financial year ending December 31, 2024 (the "Reporting Period").

This Report describes efforts taken by Pactiv Canada to prevent and reduce the risk that forced labour or child labour (collectively, "Modern Slavery") is used at any step in our production of goods in Canada or elsewhere, or in our importing of goods into Canada. This has been done in accordance with the mandatory reporting criteria outlined in Sections 11(1) and 11(3) of the Act.

Pactiv Canada does not report under similar legislation in any other jurisdiction.

### **2. Pactiv Canada Inc. Structure, Activities and Supply Chains**

#### ***Structure***

Pactiv Canada is a private corporation incorporated under the *Business Corporations Act* (Ontario), headquartered in Ontario, Canada. During the Reporting Period, Pactiv Canada was a wholly-owned subsidiary of Pactiv Evergreen Inc.<sup>1</sup> ("Pactiv Evergreen"), which was a publicly-traded U.S. corporation during the Reporting Period.<sup>2</sup>

#### ***Activities and Operations***

Pactiv Canada, a subsidiary of Pactiv Evergreen, is a leading manufacturer and distributor of fresh foodservice and food merchandising products and fresh beverage cartons in Canada and, on a limited basis, in the United States. We produce a broad range of products that protect, package and display fresh food and beverages for consumers. We supply our products to a broad and diversified mix of companies, including full-service restaurants, quick service restaurants, foodservice distributors, supermarkets, grocery and health eating retailers, other food stores, food and beverage producers and food processors.

Pactiv Canada operates four facilities in Ontario, Canada, including two manufacturing facilities, a warehouse and an engineering and mold making facility.

As of December 2024, we employed 258 employees, all of which are based in Canada.

#### ***Supply Chains***

As a subsidiary of Pactiv Evergreen, Pactiv Canada utilizes Pactiv Evergreen's broad supplier base, which includes products and components sourced from suppliers domestically and internationally. All vendors are approved by Pactiv Evergreen's centralized procurement department and expected to comply with Pactiv Evergreen's Supplier Code of Conduct, discussed below.

Specifically, in 2024, Pactiv Canada imported its raw materials and many finished goods from suppliers in the United States, spare machinery parts from suppliers in Europe, and some food and beverage packaging

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<sup>1</sup> Pactiv Evergreen Inc. does not have reporting obligations under the Act.

<sup>2</sup> On April 1, 2025, Pactiv Evergreen was acquired by Novolex Holdings LLC and delisted from the New York Stock Exchange.

products that are manufactured by a supplier in China with whom Pactiv Canada has a long-standing relationship.

### **3. Company Policies and Due Diligence Processes**

Pactiv Evergreen took an organization wide approach to Modern Slavery compliance, which includes Pactiv Canada. The Policies and Procedures set out below were implemented at a parent company level and applied to Pactiv Canada.

#### ***Business Code of Conduct and Ethics***

Pactiv Evergreen has adopted and implemented a Code of Business Conduct and Ethics (the “**Code of Conduct**”), which applies to all officers, employees, board members, and workers at Pactiv Evergreen and all subsidiaries, including Pactiv Canada. The Code of Conduct reiterates our commitment to respecting human rights in accordance with the United Nations Guiding Principles on Business and Human Rights, the United Nations Universal Declaration of Human Rights, the International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. In addition, the Code of Conduct specifically and strictly prohibits human trafficking and the use of forced or child labour, including the employment of anyone under 18 years of age.

The Code of Conduct sets out the expectation that anyone who witnesses a potential violation of the Code of Conduct or applicable laws or regulations will report the issue. The Code of Conduct also details our zero-tolerance principle for retaliation toward anyone who asks questions, reports issues or assists with an investigation.

#### ***Supplier Code of Conduct***

Pactiv Canada seeks to do business with vendors who share our commitment to and respect for human rights. Every vendor is expected to accept and comply with our Supplier Code of Conduct, which explicitly and strictly prohibits the use of forced or child labour by a business providing goods or services to Pactiv Canada.

#### ***Anonymous complaint hotline***

Pactiv Canada utilizes an independent compliance service to provide the Ethics and Compliance Hotline (the “Hotline”). Through the Hotline, employees, customers, vendors and others can report violations or concerns, including claims about the use of forced or child labour. Reports to the Hotline are investigated thoroughly by either internal compliance personnel or third parties, depending on the nature of the concern. The contact information for the Hotline is included in onboarding information for new Pactiv Canada employees and reenforced annually during training. Contact information is also posted at all of Pactiv Canada’s facilities and accessible on Pactiv Evergreen’s website.

The Hotline reports and investigation results are analyzed to target potential trends and systemic issues for remediation.

#### ***Third Party Audit***

Pactiv Canada has participated in a Sedex Members Ethical Trade Audit (“SMETA”) conducted at one of Pactiv Canada’s facilities by an independent third party as part of our compliance due diligence. The SMETA audit report confirmed that there was no evidence of the use of forced or child labour.

### **4. Potential Areas of Risk in Our Operations and Supply Chains**

#### ***Potential Areas of Risk in Our Operations***

We consider the risk of Modern Slavery occurring within our operations to be low considering that all work performed by Pactiv Canada is conducted by our entirely Canadian workforce. From a geographical risk perspective, our employees are limited to Canada, which has a low prevalence of child and forced labour, low

