



Mondi Group

Human trafficking and modern slavery statement 2025

Mondi's human trafficking and modern slavery statement 2025

This document is Mondi's 'Human trafficking and modern slavery statement' for the 2025 financial year (1 January 2025 to 31 December 2025), required in accordance with Section 54 of the UK Modern Slavery Act 2015 for all obligated companies outlined in Appendix 1, and the report required by the Fighting Against Forced Labour and Child Labour in Supply Chain Act Canada for Mondi Hinton Inc. Additional details for Mondi Hinton are added in Appendix 2.

It outlines the steps we have taken during the financial year and the measures that we plan to put in place in future to address potential risks of modern slavery in all its forms, including forced labour, child labour and human trafficking within our operations and supply chains. The statement has been prepared using UK Government's template for International Reporting on Modern Slavery, Forced Labour and Child Labour.

Our Mondi Action Plan 2030 (MAP2030) commitment is to continuously strengthen governance systems to prevent human rights violations and remedy any adverse impacts.

Our Human Rights Due Diligence (HRDD) process supports us to identify, assess, mitigate and remedy adverse human rights impacts, including risks relating to forced labour, child labour, human trafficking and other forms of modern slavery.

In 2025, we completed a review of our human rights due diligence (HRDD) process for all our operations. Based on their individual risk assessment we have implemented appropriate measures as part of our integrated sustainability management processes.

We identify sustainability risks and assess supplier performance through our Responsible Procurement process. We screened 2,128 suppliers in 2025, focusing on the highest-risk categories and followed up with 168 suppliers through in-depth sustainability risk assessments. At year-end we were able to de-escalate 108 of these suppliers to medium risk level. 36 of these suppliers were still working on their assessment or the corrective actions assigned. We continue to work to mitigate residual risks of the 24 supplier sites (1%) that remained unresponsive.

Our anonymous whistleblowing and grievance platform, SpeakOut, is available to the public and our employees. In 2025, we had 142 reports on topics including work-related harassment, safety, health and business integrity. No incidents were related to modern slavery or human trafficking.

In 2025, there were no known instances of modern slavery in our operations or supply chains. We remain committed to continuously improving our approach and working towards our MAP2030 targets.

We are transitioning into a continuous management approach where our actions on human rights are built into regular business processes. Consequently we have updated our MAP2030 target to regularly review the effectiveness of our risk-based human rights due diligence and take appropriate actions.

This statement is made in accordance with the requirements of the UK Modern Slavery Act and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act. It is made on behalf of those legal entities within the Mondi Group that had a turnover exceeding £36 million during 2025 and had directly or indirectly provided goods or services to the UK in 2025. These legal entities are included in Appendix 1 to this statement and Appendix 2 sets out additional details in relation to Mondi Hinton Inc. All obligated legal entities within the Mondi Group have also confirmed the statement. This statement has been approved by the Mondi Board on 23 April 2026 and is signed on its behalf by:



Andrew King

Mondi Group Chief Executive Officer

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Our organisational structure, businesses and supply chain

Mondi is a global leader in packaging and paper, contributing to a better world by producing products that are sustainable by design. Sustainability is at the centre of our strategy, with our ambitious commitments to 2030 focused on circular driven solutions, created by empowered people, taking action on climate.

In 2025, Mondi generated €1,072 million in cash from operations and an underlying EBITDA of €1,001 million. Mondi has a premium listing on the London Stock Exchange (MNDI), where the Group is a FTSE 100 constituent, and also has a secondary listing on the JSE Limited (MNP).

We employ 24,000 people in more than 30 countries and operate over 100 production sites, mostly located across Europe, North America and Africa.

Read more about where we operate in the [Mondi Group Integrated Report](#) page 7.

Corrugated Packaging

10 mills
29 converting plants

Flexible Packaging

5 mills
65 converting plants

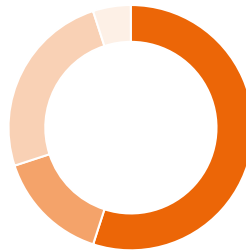
The Group is structured around the two business units Corrugated Packaging and Flexible Packaging.

Corrugated Packaging

We are a leading European corrugated packaging producer, with a cost-competitive asset base, integrated production network and strong customer offering focused on quality, reliability and service.

In addition, we produce a wide range of printing papers at our mills in central Europe and South Africa where we have regional leadership positions. We also produce market pulp in South Africa for customers around the world.

Corrugated Packaging end-uses (based on 2025 revenue)



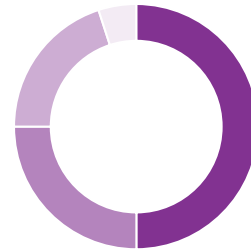
- Consumer and retail
- Industrial and agriculture
- Paper for printing
- Pulp

Flexible Packaging

We are a global producer of flexible packaging, offering our customers a unique portfolio of solutions across industrial and consumer end-use applications.

We primarily produce kraft paper, comprising sack kraft and speciality kraft, which is converted into paper bags or used for specialist consumer or industrial applications and, in some instances, with the addition of a coating or a barrier.

Flexible Packaging end-uses (based on 2025 revenue)



- Consumer and retail
- Building and construction
- Industrial and agriculture
- Pulp



- Corrugated Packaging
- Flexible Packaging
- △ Mill
- Converting plant
- Head offices

Our organisational structure, businesses and supply chain

Our integrated value chain

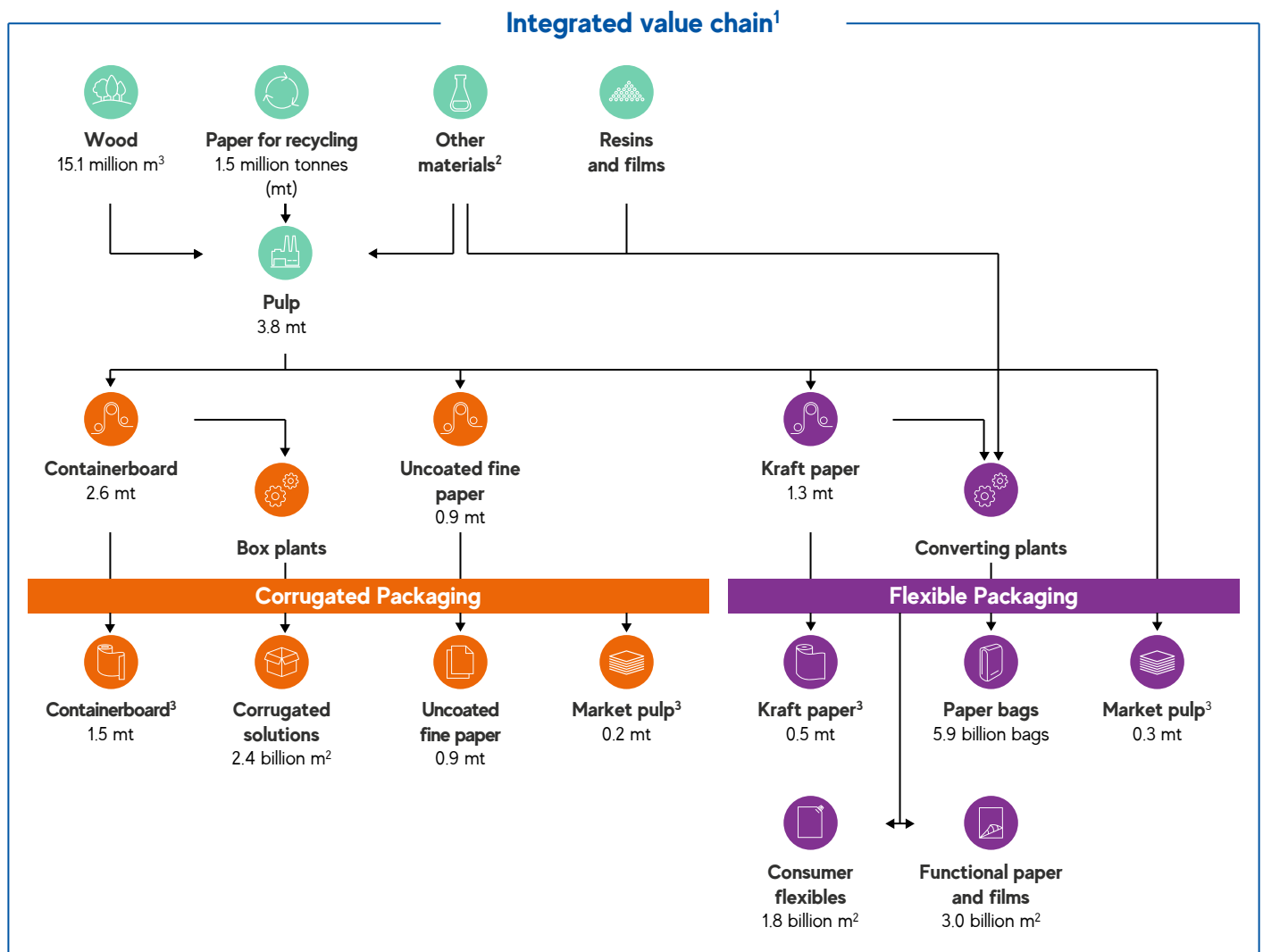
Mondi operates an integrated business across the value chain, producing sustainable solutions for consumer and industrial applications.

We require materials such as wood, paper for recycling, chemicals and resins, access to natural resources (most notably water), and energy in our manufacturing processes.

Wood is the primary raw material used in our fibre-based solutions. Our European mills procure wood locally from responsible sources, while our South African mills primarily source wood from our own sustainably managed certified plantations.

Our pulp and paper mills produce pulp, containerboard, kraft paper and uncoated fine paper. Our key mills have integrated pulp and paper processes, which provide efficient and cost-competitive production as well as energy generation.

Our converting operations use containerboard or kraft paper together with other raw materials to produce a broad range of innovative corrugated and flexible packaging products by leveraging our product expertise and quality asset base. A detailed energy and material flow chart providing an overview of the purchased quantities of input materials as well as our output production statistics and waste, energy, water- and air emissions generated can be found in our [2025 Sustainable Development report](#) on page 77.



1 Integrated value chain based on 2025 statistics.

2 We produce more pulp, containerboard and kraft paper than we consume. We however procure some of these products externally due to commercial and logistic reasons.

3 Net exposure (calculated as the total volume produced that exceeds the total volume consumed).

Our organisational structure, businesses and supply chain

Our supply chain

In 2025, our global supply chain included around 12,000 suppliers in 67 countries worldwide. We procured €6.2 billion in goods and services from our suppliers with products and services purchased locally, representing 60% of our overall spend.

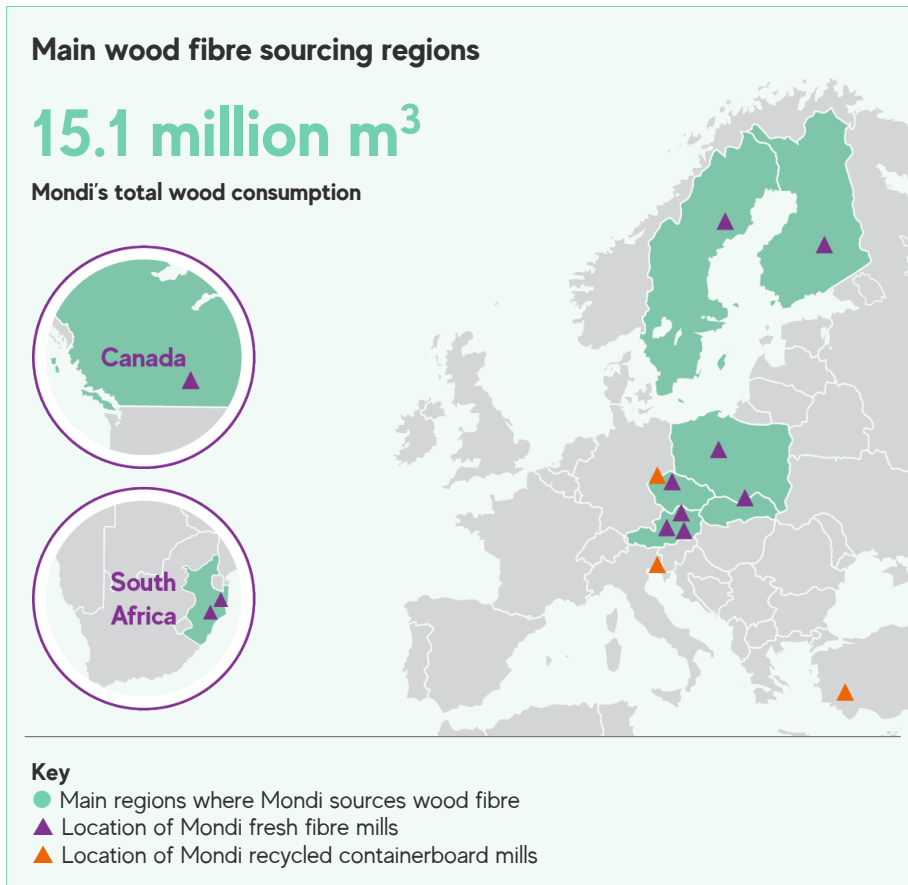
Traceability beyond our direct suppliers depends on the supplier relationship and material category. We currently have not mapped suppliers below tier 1. In our sustainability framework, MAP2030, we have a clear commitment to create greater transparency in our supply chains through our Responsible Procurement process, where we identify risks and monitor our suppliers globally based on their sustainability risk and performance. We will continue to develop our supply chain understanding in a risk-based approach aligned with our Responsible Procurement process priorities.

Wood fibre is our most important raw material for producing paper and packaging solutions. We source more than 90% of our wood fibre from the countries where our pulp and paper mills are located.

Global wood fibre sourcing is coordinated through our dedicated fibre sourcing team, in line with our Due Diligence Management System, which stipulates that all wood fibre comes from responsible sources to meet our commitment to zero deforestation. In 2025, 100% of our fibre was responsibly sourced, with 82% certified (2024: 75%) under Forest Stewardship Council™ (FSC™)¹ or Programme for the Endorsement of Forest Certification (PEFC) standards. The remaining volume met the FSC Controlled Wood standard.

During 2025, we focused on ensuring traceability and linking to the EU Commission's information system of the EU Regulation on Deforestation-free products (EUDR).

¹The license numbers of Mondi Paper Sales GmbH - Fibre Packaging/Paper are FSC-C012179 and Mondi Paper Sales - Uncoated Fine Paper are FSC-C015522 and PEFC/06-33-136.



Organisational governance and policies

Governance related to modern slavery risk management

The Board and its committees provide strategic leadership in upholding strong corporate governance across the Group, ensuring integrity, accountability, fairness and transparency. The Sustainable Development (SD) Committee is the Board committee, chaired by an independent non-executive director, that oversees the Group's sustainability approach, policies, performance and commitments. The committee confirms updates to the SD policies, reviews Mondi's Human Rights Due Diligence process and recommends Mondi's Human Trafficking and Modern Slavery Statement to the Board for approval. The Board endorses our approach and monitors performance, including the management of risks associated with modern slavery and human trafficking. More information about our sustainability governance can be found in our [2025 Sustainable Development report](#) on page 17.

During 2025, the Executive Committee and the SD Committee discussed the progress Mondi is making in addressing its modern slavery risks, including an overview of Mondi's processes and procedures. The Board approved Mondi's Human Trafficking and Modern Slavery Act statement 2025.

While the Board has ultimate accountability for sustainability issues, including human rights, modern slavery and human trafficking, Mondi's business units establish appropriate responsibilities and procedures at a local level, guided by values and principles set out at the Group level. Mondi's SD experts provide strategic guidance and operational support to drive progress towards reaching the Group's sustainability objectives. Through close collaboration between Mondi Group functions including Sustainable Development, Human Resources, Legal, and Procurement on the topic of human rights, we continue to integrate human rights considerations into our business processes and provide guidance for operations to establish relevant procedures and responsibilities.

Information gathering

The information gathered to respond to the legislative requirements relevant for this report is centrally organised by Group Sustainable Development bringing together inputs from central Procurement, Fibre Sourcing, Internal Audit, and other functions. Obligated companies under the UK Modern Slavery Act and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act are consulted where relevant.

Stakeholder engagement

Engaging with stakeholders across our value chain enables us to understand our operating environment and our impacts on people and the planet.

Key topics in engagement with our suppliers and contractors can include responsible procurement, sustainability risk assessment and mitigation, fair tender processes and contractor working conditions. We facilitate open dialogue with the communities where we operate, and develop structured engagement plans aligned with local priorities. Human Rights and modern slavery are not stand-alone agenda topics in our regular conversations, but any related insights generated are integrated into our due diligence measures and acted upon. We are also reviewing our engagement with relevant stakeholders to identify how we can meaningfully engage in relation to human rights, including modern slavery.

Internal operating policies

Our Sustainable Development Management System (SDMS) provides a structured framework for effective governance of our activities. It supports the practical implementation of our sustainable development policies across all areas.

The SDMS includes policies, operating standards and practice notes, which support us in applying a consistent and standard approach to sustainability throughout our operations. It applies to all facilities and operations we manage and operate, including those with a controlling interest, new developments and mergers or acquisitions. Contractor activities are also covered, and must comply with our SDMS.

Our Group policies are published on our website and additional guidance for implementing Group-wide policies is provided to all Mondi employees through our global intranet, including translation into multiple languages. We have dedicated communication to relevant functions to create awareness and understanding of updated policies.

The Labour and Human Rights Policy defines our commitment to respecting internationally accepted human rights standards, including the International Bill of Human Rights, the UN Guiding Principles and the ILO Declaration on Fundamental Principles and Rights.

The Board, supported by the SD Committee, reviews and approves the Group's policies annually. Experts from various functions, including Human Resources, Procurement, Legal, Group Internal Audit and Sustainable Development are involved in the review and implementation of the Labour and Human Rights Policy, to ensure alignment across most relevant departments. In the 2025 review, the content was agreed to be appropriate, while some minor adaptations to wording were implemented to facilitate understanding of the policy.

In 2025, we consulted with stakeholders of the related Group functions (Human Resources, Procurement, Legal, Group Internal Audit and Sustainable Development) as well as representatives of local operations that manage the engagement with communities and key local stakeholders to review our Human Rights Operating Standard and the respective Practice Note. In the update we combined the Group-led approach with the minimum requirements for local operations. Aligned with the UN Guiding Principles, this risk-based approach integrates the due diligence requirements into all relevant policies and processes. It brings together the elements of established processes such as Responsible Procurement and SpeakOut. This supports us in developing a holistic overview of all related risks and impacts in our own operations and supply chain.

Organisational governance and policies

Code of Conduct for Suppliers

Our [Code of Conduct for Suppliers](#) addresses the following areas: legal compliance; product safety, environment and climate; safety and occupational health; labour and human rights; and business ethics.

Related to the risk of modern slavery and human trafficking in the supply chain, the Code defines our supplier expectations and covers aspects such as work permits and employment contracts, fair wages, trade unions, child labour, harassment, inhumane treatment, modern slavery and human trafficking.

The Code of Conduct for Suppliers is available in multiple languages on our [website](#) and is reviewed and updated annually. All procurement colleagues globally have received the latest version of the Code to integrate into supplier engagement and contracts.

We continue to roll out our Code of Conduct for Suppliers to all our suppliers, which requires them to:

- identify human rights risks and impacts, assess them, and implement appropriate management controls and corrective action, when relevant;
- have in place adequate remedial mechanisms in case of any violations; and
- notify Mondi immediately if they become aware of or have reason to believe that they or any of their officers, agents or companies operating within their own supply chain have breached any of the requirements of the Code.

Suppliers shall be aware of, and monitor, sites and companies involved in their production and supply network, and should, upon request, provide Mondi with adequate details of the supply chain for the goods and/or services supplied to Mondi.

We expect our suppliers to uphold our Code by having their employees, representatives, contractors and subcontractors understand and comply with the requirements, and by applying comparable standards to their own supply chain.

We take a risk-based approach to assess suppliers against the requirements of the Code and take additional steps in to verify compliance where relevant.

Mondi Group policies

Labour and Human Rights Policy	Defines our commitment to respecting internationally accepted human rights and standards and outlines our responsibility concerning our employees, covering fair working and recruitment practices, rights of collective bargaining and freedom of association, clear statements of no tolerance for modern slavery, human trafficking and child labour and commitments regarding our suppliers and communities.
Safety and Occupational Health Policy	Outlines Mondi's core value of protecting our employees' and contractors' safety, health, mental wellbeing and security through the development and implementation of local safety and health management systems.
Supply Chain and Responsible Procurement Policy	Defines supply chain transparency and sustainability as integral principles of supplier management, implemented via the Code of Conduct for Suppliers minimum requirements, performance reviews, training and long-term partnerships.

Specific requirements for suppliers

Code of Conduct for Suppliers	Defines the standards for our suppliers for environmental, social and governance topics, and other legal and ethical issues.
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Sustainable Development Management System (SDMS): Guidance for Mondi operations and employees (internal documents)

Human Rights Operating Standard	Guides local management to implement the Labour and Human Rights Policy and defines minimum requirements for operations to identify, prevent, mitigate and account for human rights risk and impacts.
Code of Business Ethics	Sets out the five fundamental ethical principles that govern the way in which Mondi and its employees conduct business. Mondi's respect for internationally proclaimed human rights and standards is one of these principles.

Due Diligence

Human Rights Due Diligence (HRDD) is a continuous management process that enables us to identify and assess potential impacts, define appropriate measures and put in place relevant management controls.

Our methodology follows six steps (see diagram) and is based on the UN Guiding Principles for Business and Human Rights.

In our MAP2030 framework, we have defined the commitment to strengthen governance systems to prevent human rights violations and remedy any adverse impacts. Modern slavery and human trafficking prevention are an integral part of our approach to human rights.

We achieved our first human rights target for MAP2030 in 2021 with the development of our Human Rights Due Diligence (HRDD) methodology.

In 2025, we completed a detailed review of the HRDD process for all our operations. The risk screening of inherent country and industry risk has not identified any significant changes to Mondi's priority human rights risks, including modern slavery. Based on the individual risk assessments of our operations, we focus on the potential highest-risk factors and define actions to prevent, mitigate or end potential human rights impacts. These measures form part of our integrated sustainability management processes and are monitored in our established systems.

Whistleblowing and grievance mechanisms

We have robust internal processes and tools in place for reporting, investigating and resolving incidents, including those related to potential human rights violations. Employees and stakeholders are encouraged to raise any concerns using our confidential platform called SpeakOut.

SpeakOut is our anonymous whistleblowing and grievance mechanism operated by an independent third party, through which anyone can raise concerns about potential misconduct or violations of our Code of Business Ethics. The platform is available 24/7 to all stakeholders and offers different channels in multiple languages.

Access to SpeakOut incident information is restricted to designated users from Internal Audit, while the resulting investigations are carried out either by Human Resources Compliance & Investigations or Internal Audit departments, involving Mondi management teams, where relevant. SpeakOut is overseen by the Audit Committee and the Board.

We address and treat all SpeakOut messages with the utmost discretion, in accordance with standard procedures, and ensuring objectivity and independence in the investigation. We protect individuals who raise concerns from retaliation through strong governance measures that ensure anonymity. We focus on professional investigation and appropriate remediation of reported cases.

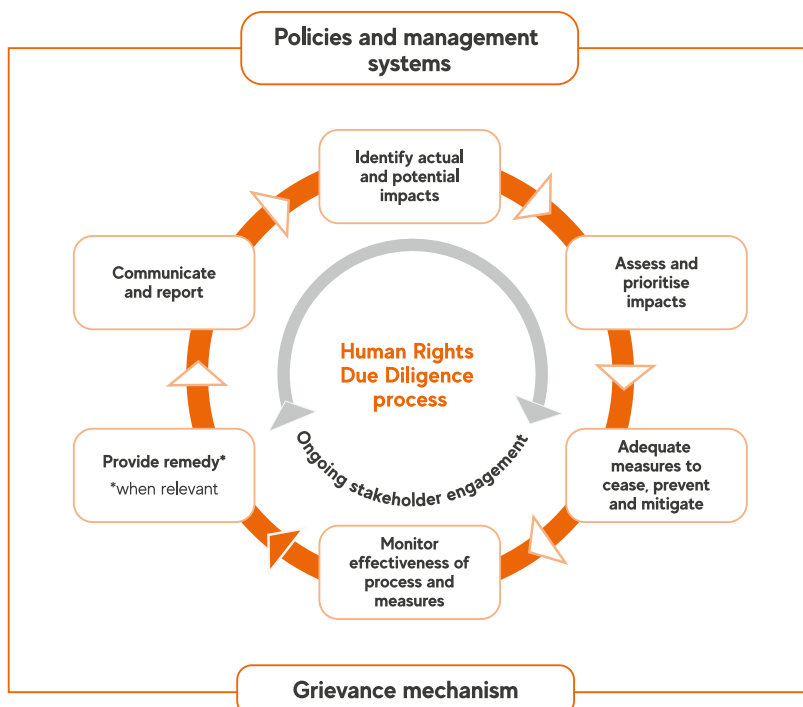
In 2025, 142 individual cases were recorded (2024: 120), raising topics such as work-related harassment, unfair treatment, working time, safety, health and environment issues and business integrity. There were no severe human rights incidents or issues of modern slavery identified.

For all cases with demonstrated breach of internal policies, we implemented appropriate corrective actions including disciplinary measures, process and control improvements (further details of cases are not disclosed due to confidentiality).

Remediation is provided where appropriate, in line with our internal process and methodology. If an investigation were to reveal that Mondi has caused or contributed to adverse human rights impacts, we would provide for or cooperate in the remediation through legitimate processes. Appropriate remediation measures are defined on a case-by-case basis, in alignment with the needs of the impacted party, aiming at addressing the impact and preventing reoccurrence. Outcomes could for example include formal apologies, restitution, rehabilitation and measures to prevent future harm. In case criminal charges are involved we will cooperate with judicial proceedings.

In 2025, we focused on introducing our SpeakOut mechanism to newly acquired operations. We have enhanced our internal structures dedicated to compliance and investigation of concerns raised by our own workforce via our SpeakOut platform.

While we welcome the absence of reports pointing to modern slavery or human trafficking, we recognise that such risks may exist, particularly when considering the full supply chain. We remain committed to continuously improving our approach and working towards our MAP2030 targets.



Assessing and managing risk

As part of our Human Rights Due Diligence (HRDD) process, we regularly review our potential human rights impacts, including modern slavery, among other means, through engagement with internal stakeholders. We collaborate with external human rights experts and engage with our partners across the value chain, as well as in the communities where we operate.

Our priority human rights focus areas include forced labour, child labour and human trafficking. These issues are determined through our HRDD process which takes into consideration any inherent risks in countries where we operate, as well as our business processes and industry risks. To support the identification of potential modern slavery risks related to our suppliers, we use EcoVadis as sustainability risk assessment provider in our Responsible Procurement process.

Combining inputs from various internal and external sources, the Group Sustainable Development function generates an overview of potential impact to people, and consequential risks to Mondi which include modern slavery in Mondi's own operations and supply chains, including forced labour, child labour and human trafficking. This assessment also provides input to our double materiality assessment and Mondi's risk management framework.

In 2025, our focus areas have not changed compared to previous years and remain aligned with our human rights roadmap and action plans.

In our own operations

Many of our existing assessments and procedures include consideration of human rights issues, typically involving health and safety, labour law compliance, community impact assessment and environmental due diligence.

We have identified our human rights focus areas through a risk-based approach and risk identification process, which considers local context, prior incidents and established practices.

Insights generated by the EcoVadis country and industry risk assessment methodology provide a foundation for the risk evaluation of our own operations and business processes. Combined with desk-based research and sources such as the Global Slavery Index, Trafficking in Persons Report, ITUC Global Rights Index, Rule of Law Index and the Children's Rights in the Workplace Index, we generate an overview of potential modern slavery risks. We take a risk-based approach and consider more in-depth assessments, where we see the highest risk potential.

Our human rights baseline was established in 2023, by an in-depth Human Rights Risk Identification questionnaire completed by all our operations.

We have assessed and prioritised the results of the risk identification process using HRDD methodology, considering the severity (scale and scope) and likelihood for rights holders. We also consulted with external human rights experts to validate our understanding of the risks identified, which confirmed our finding that there were no adverse human rights issues reported in Mondi operations.

In 2025, no significant changes in Mondi's risk assessment were identified and no instances of modern slavery were reported in Mondi operations.

Assessing and managing risk

In our supply chain

We have two distinct mechanisms to manage supply chain risk within our procurement activities: the Due Diligence Management System (DDMS) for sourcing wood and pulp; and the Responsible Procurement process for all other materials and services.

Responsible Procurement process

We apply a risk-based approach to assess suppliers against the standards set in our Code of Conduct for Suppliers. We use EcoVadis, a global provider of sustainability intelligence solutions, to identify and assess risks in our supply chain. The integration of this third-party tool enhances the accuracy and robustness of our Responsible Procurement process and enables scalability.

The initial screening is determined by country and industry risk according to EcoVadis risk assessment methodology. It indicates the potential supplier risks in four areas: environment, labour and human rights, ethics and sustainable procurement. Risks of modern slavery and human trafficking are included in the EcoVadis methodology and integrated in the labour and human rights risk score.

We screened 2,128 supplier sites in 2025 (2024: 2,436), focusing on the highest-risk categories, such as aluminium, chemicals or films. From the screened supplier sites, we have followed up with 168 suppliers through in-depth sustainability risk assessments (2024: 250). By the end of 2025, 36 of these suppliers were still working on their assessment or the corrective actions assigned, and 24 supplier sites remained unresponsive.

The scorecards from the EcoVadis rating platform provide information on the sustainability performance and potential related risk for each supplier. The assessment includes aspects of internal management systems related to modern slavery, such as policy and documentation, measures to prevent forced labour and human trafficking and reporting information provided. External sources, such as media monitoring, are used to identify adverse reports regarding child labour, forced labour and human trafficking.

We have started using the dedicated EcoVadis Modern Slavery report and the various functionalities in the tool for identification of possible cases, helping us to be informed about potential modern slavery issues in our supply chain. The tools identify significant adverse reports, based on external sources, as well as sustainability third-party audit findings of non-compliance on child and forced labour in the supplier site, or from a site owned by the parent entity.

In 2025, we followed up with seven suppliers concerning their third-party sustainability audit findings, mainly related to a site in their wider group. None of the non-conformities outlined by external third-party auditors occurred in a site directly supplying to Mondi. Irrespective of this supplier relationship or the overall sustainability rating, we engaged with the suppliers to understand the findings. More than half of the suppliers have already closed their non-conformities and provided more detailed information on the specific incidents. We continue to follow-up with the suppliers that have not yet provided the required information.

Responsible wood sourcing and certification

Our Due Diligence Management System stipulates that all our wood fibre (round wood, wood chips and market pulp) is purchased from responsible sources in line with our policies. We do not accept wood fibre from sources where critical biodiversity and important ecosystem values are threatened, or where the fundamental rights of workers and communities are violated. To manage the risks, we use independent voluntary certification schemes, such as Forest Stewardship Council™ (FSC) and Programme for the Endorsement of Forest Certification (PEFC). Their standards require fulfilment of human rights based on the ILO Declaration on Fundamental Principles and Rights at Work, including modern slavery topics, such as the use of forced labour and child labour.

100% of wood fibre sourced originates from responsible sources, which are declared as PEFC or FSC certified, or FSC Controlled Wood as a minimum. Additionally, to confirm supply chain integrity, we ensure that 100% of our pulp and paper mills have valid FSC and/or PEFC chain of custody certification. Both certification systems require annual third-party audits conducted by independent accredited certification bodies.

Assessing and managing risk

Modern slavery risks

Our Labour and Human Rights policy as well as the Code of Conduct for Suppliers state that we have zero tolerance for any inhumane treatment of employees including forced labour, child labour, human trafficking and other forms of modern slavery.

In relation to fair working conditions, we collaborate across functions to gain a better understanding of potential adverse impacts and the prevention and mitigation measures already established in our operations. Our consideration of vulnerable groups in these initiatives extends beyond Mondi's own employees and includes leased employees as well as contractors.

For our own employees as well as workers in the value chain we consider harassment, harsh treatment, violence, intimidation, corporate punishment, mental or physical coercion, and verbal or sexual abuse as potential risks.

Related to modern slavery risks, we look at methods of discipline or control over workers, such as threats of violence, retaining employees' identification, passports or work permits as well as charging deposits or recruitment fees as a condition of employment.

We have not detected any cases or practices of modern slavery in the risk assessment of our own operations. Nevertheless, we identified some processes that, if not properly managed, have a potential to increase the risk of exploitation of vulnerable groups. Some of the processes identified included provision of workplace essentials, wage deductions as a disciplinary measure and missing guidance for working with agencies. Establishing good practices in these areas helps us to continue to improve our risk mitigation practices for modern slavery.

In 2025, we have started to review the topic of recruitment through third-party labour providers. Although our analysis has not revealed that this is a high-risk area for Mondi, we aim to establish a clear governance process to integrate responsible recruitment via labour agencies into our established processes. Based on international guidance and aligned with our commitment to ILO Fundamental Principles, we clearly highlight to all business partners that we do not allow or condone the imposition of financial burdens on employees or contractors, including recruitment fees or withholding wages.

We have held workshops with our global safety professionals related to detecting the signs of modern slavery and forced labour in 2023. The recommendations to embed human rights considerations into existing processes, such as on-site audits, have started to be implemented.

We pay special attention to our contractors, whose employees work directly at Mondi sites. While most activities at Mondi are carried out by our own employees, contractors play a vital role in specific occupational health and safety high-risk areas, such as forestry operations and various project-related tasks across our sites. In 2025, we had an average of 13,865 contractors across the Group (2024: 13,889).

Local managers monitor the recruitment mechanisms and working conditions for our contractors. We directly commission the companies that provide repair and maintenance services for the annual maintenance shuts at our pulp and paper mills. Similarly, for harvesting activities in our forestry operations in South Africa, we hire contractor companies that specialise in harvesting operations instead of hiring the workers directly. Most of our contractors are considered skilled workers with technical knowledge and hired by their respective companies on a legal and predominantly permanent basis.

Mondi's Social Psychology of Risk (SPoR) is also embedded into contractor engagement. The connection between modern slavery risks and the SPoR approach has been discussed in dedicated workshops with safety professionals to create awareness and work on relevant risk mitigation measures.

Training

Training is a key element of our approach to managing potential modern slavery and human trafficking risks. It raises awareness of these risks, informs our people of our policies and approach, strengthens knowledge and learning across the Group, and equips relevant teams with the skills and practical guidance needed to identify, monitor, report, and manage risks and incidents.

We have undertaken training of different employee groups since the introduction of the UK Modern Slavery Act. In previous years we focused on general awareness raising for human rights and dedicated modern slavery prevention workshops with the Safety and Human Resources networks. These workshops resulted in recommendations to strengthen our processes and guidance material for mitigating modern slavery risks. The specialists then apply and share the insights gained where relevant across Mondi's operations.

Human rights and modern slavery are part of our specific sustainability training sessions in the Sustainable Development Academy. These annual training sessions are developed by our internal topic experts, based on relevant international guidance material from reliable sources, such as UN and ILO, and Mondi's internal HRDD process experience. In 2025, the online training included a specific focus on modern slavery, with an interactive HRDD case study exercise to engage training participants into the individual due diligence steps.

For all managing directors of operations obligated under the UK Modern Slavery Act, a dedicated online training on the legislative requirements and Mondi's approach to human rights and modern slavery was hosted.

We continue to advance our roadmap for developing the required capabilities across our businesses to integrate human rights into all relevant management processes. This includes training that addresses the expertise required in local businesses, central functions, management skills and general awareness related to modern slavery and human rights.

We recognise the importance of ensuring our suppliers understand our approach and how to address human rights risks, including modern slavery and human trafficking. For some suppliers, corrective actions identified through the Responsible Procurement process included a review of their internal management systems related to labour and human rights, comprising considerations for modern slavery. Suppliers that have participated in the in-depth assessment also have access to the EcoVadis Academy which offers specific training sessions for these topics. Building capacity to improve the sustainability performance of our suppliers is a key component of our supplier engagement.



Evaluating the effectiveness of our approach

Our sustainability framework, Mondi Action Plan 2030 (MAP2030), sets out the targets and milestones we need to achieve to meet our ambitious sustainability commitments.

We currently do not have any dedicated targets related to modern slavery as we take a holistic approach to human rights. KPIs from various functional areas and existing practices support our human rights approach, these include diversity and employee statistics, health and safety, environmental emissions and incidents, community impact assessments, and SpeakOut results. We monitor the performance against the set targets and report transparently on our progress in our Sustainable Development report.

Continuous improvement

Since our first MAP2030 target in 2021, we have continued to gain experience and in-depth understanding of Human Rights Due Diligence (HRDD).

HRDD is a risk-based and continuous management process that encompasses all business activities. It cannot be considered 'completed' at a certain point in time. We therefore focus on strengthening governance systems to prevent human rights violations and remedy any adverse impacts.

We have adapted our MAP2030 human rights target to "Regularly review the effectiveness of our risk-based Human Rights Due Diligence process and take appropriate actions". This represents our transition to a continuous management approach where our actions on human rights are built into regular business processes.

See our [2025 Sustainable Development report](#) for more details on MAP2030 targets and progress supporting human rights efforts.

Approach	Progress 2024	Progress 2025	Next steps
Policy and governance Commitment to strengthen governance systems to prevent human rights violations and remedy any adverse impacts.	Reviewed our policies with relevant stakeholders including internal experts from various functions to ensure alignment across departments.	Updated our Human Rights Operating Standard and Practice Note to a combined Group-led approach with clear minimum requirements for local operations.	Establish a continuous management approach where our actions on human rights are built into regular business and engagement processes.
Due Diligence Targets to have Human Rights Due Diligence (HRDD) in all operations by 2025 and all impacts addressed by 2030.	Implemented our human rights roadmap, developed based on the findings from the initial risk assessment. In 2024, no adverse human rights impacts or incidents were reported in Mondi operations.	We completed a detailed review of the Human Rights Due Diligence steps for all our operations. Actions to prevent, mitigate or end potential human rights impacts form part of our sustainability management processes and are monitored in our established systems.	Regularly review the effectiveness of our risk-based Human Rights Due Diligence process and take appropriate actions.
Supplier risk assessment Commitment to mitigate risks and create greater transparency in our supply chains through our Responsible Procurement process.	Scaled up our Responsible Procurement process and screened 2,436 supplier sites, focusing on the highest-risk categories. 250 suppliers were further evaluated with in-depth sustainability risk assessments, and 32 supplier sites (1%) were classified as high risk at year-end 2024.	We screened 2,128 supplier sites, and followed up with in-depth sustainability risk assessments of 168 suppliers. At the end of 2025, 36 suppliers were still working on their assessment or the corrective actions assigned, and 24 supplier sites (1%) remained unresponsive.	Focus on continuous improvement and applying a risk-based approach by covering all key suppliers in our highest-risk categories and sustainability risk assessments when onboarding new suppliers.
Grievance reporting SpeakOut is Mondi's anonymous grievance channel, operated by an independent third party through which anyone can raise concerns on potential violations to our Code of Business Ethics.	In 2024, we had 120 reports from SpeakOut and other channels. No incidents were related to modern slavery or human trafficking.	In 2025, 142 individual cases were recorded, raising topics such as work-related harassment, unfair treatment, labour rights, safety, health and environmental issues, and business integrity. No cases were related to modern slavery or human trafficking.	Continue to treat all SpeakOut messages with the utmost discretion, in accordance with standard procedures, and ensuring objectivity and independence in the investigation.
Training Working with external experts and conducting internal training sessions to raise awareness of human rights risks.	Continued awareness raising and offered training for all employees. Focused workshops on modern slavery and human rights with specialist networks of Safety and Human Resources.	SD Academy training about human rights available for all employees with deep-dive into modern slavery. Dedicated online training for managers of UK Modern Slavery Act obligated companies.	Training roadmap for building awareness across our businesses to integrate human rights into relevant management processes.

Appendix 1

Obligated companies by the UK Modern Slavery Act for the 2025 financial cycle

Corporate

Mondi plc

Corrugated Packaging

Mondi Ansbach GmbH
 Mondi Corrugated Poland Sp z o.o.
 Mondi Neusiedler GmbH & Co KG
 Mondi Paper Sales GmbH
 Mondi Powerflute Oy
 Mondi SCP, a.s.
 Mondi South Africa (Pty) Limited
 Mondi Świecie Sp. z o.o..
 Mondi Turkey Oluklu Mukavva Kağıt Ve
 Ambalaj Sanayi Anonim Sirketi
 Mondi Wellpappe Deutschland GmbH

Flexible Packaging

Mondi Bags Mielec Sp. z o.o.
 Mondi Bags Świecie Sp. z o.o.
 Mondi Békéscsaba Kft
 Mondi Coating Štětí a.s.
 Mondi Coating Zeltweg GmbH
 Mondi Dynäs AB
 Mondi FlexPack Trading GmbH
 Mondi Frantschach GmbH
 Mondi Halle GmbH
 Mondi Heerlen B.V.
 Mondi Innccoat GmbH
 Mondi Italia S.r.l.
 Mondi Jülich GmbH
 Mondi Kale Nobel Ambalaj Sanayi Ve
 Ticaret Anonim Sirketi
 Mondi Korneuburg GmbH
 Mondi Örebro AB
 Mondi Padova S.r.l.
 Mondi Poperinge N.V.
 Mondi Poznań Sp. z o.o.
 Mondi Release Liner Austria GmbH
 Mondi Solec Sp. z o.o.
 Mondi Štětí a.s.
 Mondi Štětí White Paper s.r.o.
 Mondi Styria GmbH
 Mondi Szada Kft.
 Mondi Trebsen GmbH

Appendix 2

Mondi Hinton Inc. – Fighting Against Forced Labour and Child Labour in Supply Chains Report 2025

This Appendix adds required details for Mondi Hinton Inc. for the 2025 financial year (1 January 2025 to 31 December 2025) in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chain Act (the “Act”).

Business structure, activities and supply chain

Mondi Hinton Inc. operates a pulp mill in Hinton, Alberta, Canada, employing approximately 320 people. The company became part of Mondi Group (Mondi) in February 2024 following its acquisition from West Fraser Timber Co. Ltd. The company is fully incorporated into the Mondi Group’s Kraft Paper business and the operational management of Mondi in the Americas.

The Hinton mill has an annual capacity of roughly 250,000 tonnes of pulp. Its core operation involves processing purchased wood chips into pulp, which is then supplied to customers for further conversion into paper products. Wood chips constitute the primary raw material used for pulp production. Additional key procurement categories include technical procurement, chemicals and transport services.

Policies and due diligence processes

As part of Mondi, all Group policies and due diligence processes outlined on pages 5-7 apply to Mondi Hinton Inc.

Forced labour and child labour risks

Risk in our own business activities

In 2025, the risk of forced labour and child labour in Mondi Hinton’s operations was evaluated as low.

As part of the risk assessment, we consult additional external resources, such as public human rights indices and risk screening platforms. Based on the assessment of sustainability rating provider EcoVadis, child labour, forced labour, and human trafficking in the manufacturing of pulp, paper and paperboard are rated as medium low.

Canada is rated as a very low risk country, based on various indices related to Environment, Health & Social, Human Rights and Governance. In the Global Slavery Index, Canada

has a very low risk of vulnerability to modern slavery.

Risk in our supply chain and steps taken to assess and manage that risk

Processes for ensuring our supply chain risk are managed as described in detail on pages 9-10, apply fully to Mondi Hinton. Mondi Hinton suppliers were included in our Responsible Procurement Process to identify sustainability risks and assess supplier performance. None of the relevant suppliers screened were identified as high risk.

West Fraser Timber Co. Ltd. is our key supplier for wood fibre and a local long-term partner. A detailed desk-based review of the supplier-related risk of forced labour or child labour has been conducted. The supplier has been classified as medium low in labour and human rights risk through our risk screening process. West Fraser Timber Co. Ltd published their [Fighting against forced labour and child labour in supply chains report 2024](#), meeting all mandatory requirements and explaining the steps taken to assess and manage the risk. No evidence of forced labour or child labour was found and they make a clear commitment to continuous improvement and further assessment of effectiveness of measures taken.

In 2025, Mondi Hinton suppliers were integrated in the groupwide Responsible Procurement process. None of the suppliers screened for potential sustainability risk in the areas of environment, labour and human rights, ethics and sustainable procurement were assessed as potential high-risk. Consequently no further in-depth assessment or mitigation measures were required.

Remediation measures, remediation of forced labour or child labour, and remediation of loss of income

In 2025, our processes did not identify any incidents of forced labour or child labour in our operations or supply chain. Consequently, we did not need to implement any remediation measures or provide remediation for forced labour or child labour, or for loss of income.

Training and awareness

All employees of Mondi Hinton have full access to Mondi training programme on human rights, including forced labour and child labour as described on page 11.

Evaluating effectiveness

All processes to evaluate effectiveness of our efforts to prevent and reduce risks of forced labour and child labour in our business and supply chains that were set up by Mondi Group (see page 12) include Mondi Hinton.

Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Paul DiJulio

Managing Director Mondi Hinton Inc.

23 April 2026

I have the authority to bind Mondi Hinton Inc.