

# Anti- Slavery & Human Trafficking Statement 2023 Glatfelter Lydney Ltd



Glatfelter UK operations have taken steps to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business. This statement is in relation to Glatfelter Lydney Ltd and Glatfelter Caerphilly Ltd.

In accordance with Section 54, Part 6 of the Modern Slavery Act 2015 (the “Act”), this statement sets out the steps that Glatfelter UK operations have taken to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business. This statement is in respect of our financial year ended 31<sup>st</sup> December 2023 and was approved by the Board of Directors in April 2024.

## What is modern slavery?

Modern slavery is an international crime, affecting millions of people around the world - a growing global issue that transcends age, gender and ethnicities. Sadly, vulnerable people from overseas, as well as across the UK, are forced to work illegally against their will. Modern slavery can take many forms, with forced labour being the most common. Therefore, businesses clearly have a key role to play in addressing the risks associated with labour exploitation and forced labour.

## Our organisation structure and supply chains

Glatfelter is a leading global supplier of engineered materials, and our stock trades on the New York Stock Exchange under the ticker symbol GLT. Our production processes and those of our main suppliers are highly automated, run by highly skilled technical personnel. Headquartered in Charlotte, North Carolina, USA, we have operations across the Americas, Europe and Asia, including two sites incorporated in the UK.

The Board of Directors (the Board) of Glatfelter Corporation is charged with providing effective governance over the Company’s business. The Company’s business is conducted by its officers, managers and employees, under the direction of the Chief Executive Officer and the oversight of the Board, which is comprised of a majority of independent directors.

Our UK operations largely use directly employed labour on permanent contracts of employment, as well as some temporary employees due to the fluctuating demand for products, which dictates differing demands for production. Our people policies ensure fair treatment of our people around the world.

Our main direct supplier (25% of raw material spend) is internally owned by Glatfelter, and therefore, bound by our internal policies and codes. Our external direct suppliers (70% European-based) are mainly professional stock-listed, long-standing organisations and have a highly automated process.

## Our policies and practices in relation to slavery and human trafficking

Glatfelter has a zero-tolerance approach to violations to the UK’s anti-human trafficking and anti-modern slavery laws. If we find breaches of these laws within our supply chain, we will look to support companies in their efforts to comply with the legislation.

Our Core Values of Integrity, Financial Discipline, Mutual Respect, Customer Focus, Environmental Responsibility and Social Responsibility are the pillars of our company culture. They embody everything that we do, and how we do business. They outline the expectation of our people's behaviour with colleagues, customers, vendors and people around the world.

We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

Our specific policies to address modern slavery risk include:

- A 'Modern-Day Anti-Slavery Policy', which sets out the key issues and how we should respond including a process for raising concerns internally.
- Our Code of Business Conduct connects our Core Values to the choices we make, ensuring we conduct our business legally, ethically, and responsibly.
- We offer multiple options for Glatfelter employees and partners to report concerns or ask questions on anything that appears to violate the law, our Core Values, or the Code. This includes the Integrity Helpline, which can be accessed by phone, website URL or QR code. The helpline is free, confidential and untraced. Concerns and questions can also be raised to the Legal team, the Board of Directors' Audit Committee Chair, any senior leader of Human Resources or an employee's manager. Glatfelter will promptly, objectively, and thoroughly investigate all reports and will take action to correct the situation, as appropriate.
- Robust recruitment processes in line with relevant employment laws
- Wellbeing strategy and initiatives to support our people's physical and mental wellbeing.
- A Supplier Code of Conduct sets out our global expectations for our business partners with respect to how they conduct business with us and on our behalf; this includes a strict prohibition that suppliers must not use any forced labour or exploitative working conditions. Furthermore, based on the child and forced labour principles of the International Labour Organisation conventions, suppliers are expected to restrict employment to those aged 15 or older or the local minimum employment age or the mandatory school age, whichever is higher.
- Human Rights Policy covering a range of topics, such as safety and health, labour standards and prohibition of forced labour and child labor, diversity and equal opportunity, and access to safe drinking water.
- Statement of Principles on Child Labour and Forced Labour.

The site is a registered member of SEDEX (Social and Ethical Data Exchange) which provides transparency on ethical and responsible practices. The site was audited to the SMETA (SEDEX Members Ethical Trade Audit) 4 pillar standard in 2014, 2019 and in 2023 which showed the site to be compliant with minor findings for correction/improvement.

## Due diligence processes, risk assessment and management

The implementation of our policies and procedures includes due diligence on suppliers that we engage with, in accordance with our Supplier Code of Conduct (which is available on our website), which was updated in 2022. In addition, our suppliers are also subject to Glatfelter's Human Rights Policy; should we have concerns of noncompliance, we would take action to address them with requests for performance improvement, or we would elect not to do business with that customer or supplier.

## Key performance indicators to measure effectiveness of steps being taken

We log complaints received via our ethics hotline system or through other sources, together with the actions taken. To the date of this statement, Glatfelter has had no identified instances of modern slavery.

In 2022, we further incorporated our Environmental, Social and Governance & Ethics (ESG) responsibilities into our organisation structure with a refreshed approach to reporting and multi-year goals. To ensure our ESG reporting is reflective of our evolving priorities and stakeholder interests, we conducted interviews with Glatfelter leadership and functional leaders in 2022 to reassess and update material topics that were previously identified. These updates demonstrate our heightened focus on human capital management, employee safety, and diversity, equity and inclusion; and our ongoing commitment to supply chain responsibility and transparency.

During 2023, the ESG Steering Committee continued their efforts to work towards the sustainability goals, identifying key objectives and opportunities for the organisation to become more accountable.

## Training on modern slavery and trafficking

Glatfelter employees, officers, agents, and directors receive periodic training on the contents and importance of the Code and related policies, and are asked to certify they are in full compliance with, and will uphold, the Code and related policy statements.

All salaried employees, including the management team, are required to complete quarterly compliance and ethics training and pass a test with at least an 80% score or fulfill certain other requirements to demonstrate their understanding of the training topics and compliance with Glatfelter's expectations.

Our HR team, which is responsible for recruitment, maintain up-to-date knowledge and awareness of modern-day slavery to ensure that our recruitment and screening practices are fit for purpose. The HR team undertake checks that all employees can demonstrate their eligibility to work freely in the UK.

Slavery and human trafficking are serious crimes, and Glatfelter is pleased to submit this statement in accordance with the scope of the Modern Slavery Act of 2015 outlining our commitment to the aims of the Act for the financial year ending 31<sup>st</sup> December 2023.

Signed,



**Valentin Ackermann**  
**Site Leader**  
**April 2024**