



MEMORANDUM

Date: December 14, 2022

To: United Nations Global Compact

From: CCL Industries, Inc.

Subject: 2022 Communication on Progress

CCL Industries, Inc. (The Company) is a first time signatory of the United Nations Global Compact (UNGC) in 2022. As such, this Communication on Progress (CoP) represents a baseline assessment of The Company's commitment to supporting the UNGC Ten Principles in each of the four categories: human rights, labour, environment, and anti-corruption.

Below is an outline of the implementation of the UNGC Ten Principles into The Company's strategies and operations. The Company commits to reporting and communicating annually to UNGC and its stakeholders on progress made to further implement these principles.

| Implementing the Ten Principles of the United Nations Global Compact into CCL Industries, Inc. Strategies & Operations | | |
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| Principle | CCL Industries, Inc. Approach | More Information |
| | President and Chief Executive Officer, Geoffrey T. Martin, reiterates The Company's continued commitment to and engagement with UNGC in the 2021 Sustainability Report. | CCL Industries, Inc. <i>Enlabeling Sustainability: 2021 Sustainability Report</i> , pp 11. |
| Human Rights | | |
| 1. Businesses should support and respect the protection of internationally proclaimed human rights. | The Company respects the human rights of all employees globally and does not tolerate harassment or discrimination. The Company has adopted best global practices and complies with all applicable regulations protecting human rights including but not limited to child labor, | CCL Industries, Inc. <i>Enlabeling Sustainability: 2021 Sustainability Report</i> , pp 18. |



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| <p>2. Businesses should make sure that they are not complicit in human rights abuses.</p> | <p>forced labor, discrimination and human trafficking.</p> | <p>CCL Industries, Inc. <i>Global Business Ethics Guide</i>, revised 2021, pp 24 – 30.</p> <p>CCL Industries, Inc. <i>Anti-Slavery and Human Trafficking Statement</i>.</p> |
| <p>Labour</p> | | |
| <p>3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.</p> | <p>The Company strictly prohibits human trafficking and forced labor, and does not employ children. The Company complies with local laws where they are more restrictive.</p> <p>The Company is also dedicated to diversity and inclusion in the workplace providing equal opportunities to all employees and applicants respecting applicable laws and regulations.</p> | <p>CCL Industries, Inc. <i>Enlabeling Sustainability: 2021 Sustainability Report</i>, pp 18.</p> <p>CCL Industries, Inc. <i>Global Business Ethics Guide</i>, revised 2021, pp 24 – 30.</p> <p>CCL Industries, Inc. <i>Anti-Slavery and Human Trafficking Statement</i>.</p> |
| <p>4. Businesses should uphold the elimination of all forms of forced and compulsory labour.</p> | | |
| <p>5. Businesses should uphold the effective abolition of child labour.</p> | | |
| <p>6. Businesses should uphold the elimination of discrimination in respect of employment and occupation.</p> | | |
| <p>Environment</p> | | |
| <p>7. Businesses should support a precautionary approach to environmental challenges.</p> | <p>The Company promotes greater environmental responsibility by integrating the social and environmental concerns into business operations and interactions with stakeholders. The Company is committed to sourcing from and fostering responsible supply chains and participating in the circular economy.</p> <p>The Company invests a fixed financial percentage of its research and development resources annually toward further development of sustainable and circular products. For example, EcoStretch is a closed-loop concept that</p> | <p>CCL Industries, Inc. <i>Enlabeling Sustainability: 2021 Sustainability Report</i>, pp 14 – 17, 21.</p> |
| <p>8. Businesses should undertake initiatives to promote the greater environmental responsibility.</p> | | |



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| <p>9. Businesses should encourage the development and diffusion of environmentally friendly technologies.</p> | <p>was born out of the CCL Label Austrian operation where, after de-linking and cleaning, used sleeves can be re-melted and shaped into pellets for re-use in base film.</p> | <p>CCL Industries, Inc. <i>Enlabeling Sustainability: 2021 Sustainability Report</i>, pp 21 – 22.</p> |
| <p>Anti-Corruption</p> | | |
| <p>10. Businesses should work against corruption in all its forms, including extortion and bribery.</p> | <p>The Company strictly prohibits employees from giving or taking bribes, kickbacks or any other form of payoff and from engaging in money laundering or corruption of any kind. Employees must comply with local and international laws and regulations pertaining to corruption, bribery and money laundering.</p> <p>Corruption is any dishonest or fraudulent conduct by those in power, typically involving bribery.</p> <p>Bribery is giving a person money or anything else of value to persuade that person to take or abstain from a particular course of action.</p> <p>A kickback occurs after the fact and is compensation to an employee for facilitating an unlawful or unethical transaction and may be a portion of the income earned from that transaction.</p> <p>Money laundering is the concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or through legitimate businesses.</p> | <p>CCL Industries, Inc. <i>Global Business Ethics Guide</i>, revised 2021, pp 20 – 23.</p> |



Resources:

CCL Industries, Inc. *Anti-Slavery and Human Trafficking Statement*, <https://cclind.com/wp-content/uploads/2019/01/anti-slavery-and-human-trafficking-statement.pdf>.

CCL Industries, Inc. *Enlabeling Sustainability: 2021 Sustainability Report*, https://cclind.com/wp-content/uploads/2022/07/2021_CCL_Sustainability_Report_062922.pdf.

CCL Industries, Inc. *Global Business Ethics Guide*, revised 2021, https://cclind.com/wp-content/uploads/dlm_uploads/2021/10/Global-Business-Ethics-Guide.pdf.