



**Genpak**

**Modern Slavery Report 2023**

This Modern Slavery Report (the “Report”) addresses the period from January 1, 2023 to December 31, 2023 and has been prepared in compliance with Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (Canada) (the “Act”).

This initial Report is made on behalf of Genpak, a division of Great Pacific Enterprises LP.

## **I. INTRODUCTION**

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading business in the packaging industry, Genpak recognizes the important role that we have in ensuring that the supply chains that support our operations and products adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain. This Report sets out the steps we have taken during the 2023 fiscal year to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by Genpak or of goods imported into Canada by Genpak.

## **II. CORPORATE OVERVIEW AND SUPPLY CHAINS**

Genpak, a division of Great Pacific Enterprises LP, is a Canadian manufacturing company with a head office in Ontario located at 3185 Pepper Mill Court, Mississauga, ON and plants based in Ontario and Quebec. Great Pacific Enterprises LP is part of the Jim Pattison Group of companies. The company has no operations outside of Canada, but is a sister company to Genpak LLC, a US company.

Genpak operates four plants which produce food packaging. There are three unionized plants in Ontario and one unionized plant in Quebec. The company has approximately \$35 million CDN in total assets, including 50% inventory and 20% fixed assets at NBV. The remaining assets are accounts receivable, cash and prepaid expenses. Genpak has approximately 300 employees. Genpak's annual gross revenues were \$90 million CDN in 2023 and \$130 million CDN in 2022. The company's revenues were heavily impacted by the Canadian single use plastics ban.

Genpak spent approximately \$70 million CDN in 2023 and \$100 million CDN in 2022 on outside goods and services.

Genpak has approximately 700 suppliers.

The main categories of goods and services procured were:

- Paperboard (raw material input);
- Paper (raw material input);
- Expandable polystyrene (raw material input); and
- Foodservice containers (for resale).

The majority of Genpak's purchases are from Canada and the US. However, Genpak purchases approximately \$3 million CDN worth of goods annually overseas primarily from three to four suppliers in Asia.

## **III. POLICIES AND DUE DILIGENCE PROCESSES**

The company has a Whistleblower Policy implemented in November of 2017 where any violation of law, regulations or company policy can be anonymously reported.

The company uses the following methods to mitigate financial, social and environmental risks:

1. New policies are posted for all employees to review;
2. Employees are asked to confirm that they have reviewed the policies;

3. Genpak or Genpak LLC employees visit offshore suppliers for observation and audit purposes; and
4. Employees are encouraged through the Whistleblower Policy to report any issues anonymously without retaliation.

Further, Genpak used an independent consultant to visit new suppliers in Asia (specifically China and Vietnam). This consultant audited the facilities and viewed operations to confirm that they operated using acceptable labour practices.

#### **IV. RISK ASSESSMENT AND MANAGEMENT**

The highest risk in Genpak's supply chain of child or forced labour is in offshore supply. Relationships with our offshore suppliers are long-term. Over the course of the relationship, representatives from Genpak, Genpak LLC or our independent consultant have visited supplier sites for observation and audit purposes. Currently, we assess our risk as low.

#### **V. MODERN SLAVERY REMEDIATION MEASURES**

We have not yet identified any instances of modern slavery and therefore have not taken any specific remedial action. Should an instance occur in the future, the nature and circumstances of the event will guide Genpak on the measures to be taken.

#### **VI. LOSS OF INCOME – REMEDIATION MEASURES**

We have not yet identified any instances of modern slavery and therefore do not have specific measures regarding loss of income. Should an instance occur in the future, the specifics regarding the occurrence will guide Genpak on how to remediate loss of income.

#### **VII. TRAINING**

There is no training specific to child labour or forced labour.

#### **ASSESSING EFFECTIVENESS**

Genpak will continue to take conscious, considered and risk-based steps to enhance our systems and processes for mitigating modern slavery risks.

The tools that Genpak uses include:

- Regular review and engagement;
- Enhancing internal awareness;
- Partnering with a third party; and
- Considering trends as part of our assessment process.

## **VIII. APPROVAL AND ATTESTATION**

This Report was approved pursuant to paragraph 4(a) of the Act by **Kristine Smith** on May 31, 2024 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at [www.genpak.com](http://www.genpak.com)

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

**Kristine Smith on behalf of Genpak**

**President, May 31, 2024**

I have the authority to bind Genpak