



## **Modern Slavery and Human Trafficking Statement for Financial Year Ending December 31, 2016**

### **INTRODUCTION**

Sealed Air Corporation's vision is to create a better way for life. It is a vision rooted in sustainability and ethical business practices. It inspires us to continuously strive to develop purposeful innovations that not only fulfil our customers' needs but also protect products being shipped, improve the security and safety of the food we eat, and improve health by keeping hospitals, hotels, office buildings and other shared environments safe and clean.

The very nature of our business requires a global culture of responsibility and we are committed to acting ethically and with integrity and transparency in all business dealings; and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. This statement sets forth our commitment to combat unethical practices in supply chains, as well as comply with requirements of the UK Modern Slavery Act 2015 and the California Transparency in Supply Chains Act ("the Acts").

### **OUR BUSINESS, STRUCTURE AND SUPPLY CHAIN**

We are a global leader in food safety and security, facility hygiene and product protection. We serve an array of markets including food and beverage processing, food service, retail, healthcare and industrial, and commercial and consumer applications through our portfolio of widely recognized brands, including Cryovac® brand food packaging solutions, Bubble Wrap® brand cushioning and Diversey® cleaning and hygiene solution. In 2016, the Company generated revenue of approximately \$6.8 billion by helping our customers achieve their sustainability goals in the face of today's biggest social and environmental challenges. We have approximately 23,000 employees and operate through our subsidiaries and have a presence in the United States and 59 other countries, enabling us to distribute our products to our customers in 171 countries.

Our supply chains include the sourcing of raw materials, packaging components, contract manufactured goods, equipment and other direct materials, such as inks, films and paper principally related to the provision and manufacturing of goods. Our principal raw materials are polyolefin and other petrochemical-based resins, as well as chemicals such as caustic soda, solvents, waxes, phosphates, surfactants, chelates, fragrances, paper and wood pulp products.

## **OUR POLICIES**

We have put in place a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Global Anti-Slavery and Human Trafficking Policy.** This policy sets forth our stance on modern slavery and how employees can identify any instances of these practices and where they can report potential non-compliance.
2. **Code of Conduct.** This provides the foundational standards of conduct for all aspects of our business, and is applicable to all our employees and operations globally. It includes provisions related to, among other things, ethical standards, compliance with laws, safe working conditions, and whistleblowing so which encourages employees to raise concerns about issues they are observing or experiencing in the workplace or within our business functions without fear of reprisal.
3. **Supplier Code of Conduct.** This code explains our commitment to ethical workplace practices and sets forth the ethical and legal standards we expect suppliers will adhere to. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act in accordance with all laws and international and organizational standards governing slavery or forced labor (*e.g.*, International Labour Organization). Additionally, supplier violations of this code may lead to the termination of the business relationship.

## **DUE DILIGENCE & VERIFICATION OF SUPPLY CHAIN RISK**

We expect all suppliers within our supply chain to comply with our values and standards set out in our company [Code of Conduct](#) and Supplier Code of Conduct. As part of our evaluation process, we may conduct due diligence when considering engaging new suppliers, and regularly review our existing suppliers by:

- Performing internal supplier audits or assessments through our own staff or a third-party, which may have a greater degree of focus on slavery and human trafficking where these types of risks are identified; and
- Demanding corrective measures In the event the company becomes aware of any actions or conditions not in compliance with our Supplier Code of Conduct. We also may terminate an agreement with any supplier who does not comply with our Supplier Code of Conduct or the contractual provisions governing compliance with laws and the provisions set forth in our Code of Conduct.

## **TRAINING**

Our company has a robust global compliance training program in place comprised of mandatory training for employees related to code of conduct and ethical business practices



using our E-Learning tool. We plan to offer training to employees globally that is specifically related to awareness of modern slavery and trafficking in business.

### **PERFORMANCE INDICATORS & AUDITS**

We are taking the following steps to measure and maintain internal accountability standards and procedures for suppliers who fail to meet company standards regarding slavery and trafficking and to ensure that slavery and human trafficking are not taking place within our business or supply chain:

- Our Supplier Code of Conduct was issued to suppliers in 2016.
- We may verify our suppliers' compliance with our Supplier Code of Conduct by conducting unannounced supplier audits or internal assessments.
- We require Suppliers agree to comply with all laws, our Code of Conduct and Supplier Code of Conduct, as applicable, by way of contractual provisions in our supplier agreements and purchase orders.

### **APPROVAL OF THIS STATEMENT**

This statement is made pursuant to the relevant legal requirements of the United States (including the individual states therein) and the United Kingdom.

A handwritten signature in black ink that reads "E. Chammas". The signature is written in a cursive style and is underlined with a long horizontal line that extends to the right.

Emile Chammas  
Senior Vice President & Chief Supply Chain Officer