ANTI-HUMAN TRAFFICKING AND MODERN SLAVERY POLICY

1. POLICY STATEMENT & PURPOSE

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.2 The very nature of our business requires a global culture of responsibility. Ethics and integrity are the foundation of Sealed Air Corporation’s (or “Company”) business success. Therefore, we have a zero-tolerance approach to modern slavery and are committed to acting ethically, with integrity and transparency in all our business dealings and relationships; and to taking steps to ensure modern slavery and human trafficking are not present in our business or in our supply chains.

1.3 This policy is informed by a number of international instruments, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the United Nations Universal Declaration of Human Rights (UNDHR), and the International Labor Organization’s (ILO) 1998 Declaration on Fundamental Principles and Rights at Work, and also a number of laws, such as the U.S. Federal Acquisition Regulation, the U.K. Modern Slavery Act 2015, and the California Transparency in Supply Chains Act of 2010.

1.4 This policy does not constitute a contract of employment and the Company may amend or terminate this Policy at any time in its sole discretion.

2. SCOPE AND RESPONSIBILITY

2.1 This policy applies globally to all persons or organizations working for us or on our behalf in any capacity, including employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, business partners or vendors.

2.2 Global Senior Leadership has overall responsibility for implementing and ensuring this policy statement complies with our legal and ethical obligations.

2.3 Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and are completing the Company’s mandatory compliance training courses which may focus on these topics.

3. RELATED DOCUMENTS

3.1 Sealed Air Corporation Code of Conduct

3.2 Sealed Air Supplier Code of Conduct
4. COMPLIANCE WITH THE POLICY

4.1 Employees have a responsibility to read, understand and comply with this policy.

4.2 It is the responsibility of all employees, contractors and any third-party conducting business with or on Company’s behalf to assist in the prevention, detection and reporting of modern slavery in our business and/or supply chain as they are able. As such, employees are required to avoid any activity that may be a breach of this policy.

4.3 Employees should notify their manager, the Global Legal Department, Supply Chain, or their local Human Resources department if they believe or suspect that a breach or a conflict with this policy has occurred. If an employee does not feel comfortable contacting any of the above departments or personnel, they should contact the Company’s ethics hotline, also known as the Integrity Line.

4.4 The Company will conduct periodic reviews of this Policy and Suppliers’ compliance with this policy and Company Supplier Code of Conduct, as necessary.

4.5 If Employees are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they should seek guidance from their manager, the Global Legal Department, local Human Resources, or Supply Chain. If an employee does not feel comfortable contacting any of the above departments or personnel, they may seek guidance by contacting the Company’s ethics hotline, also known as the Integrity Line.

4.6 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring no one suffers any detrimental or retaliatory treatment as a result of making a report in good faith in their suspicion that modern slavery in whatever form is or may be taking place in any part of our own business or in any of our supply chains.

5. COMMUNICATION AND AWARENESS OF THIS POLICY

5.1 Company will communicate these principles and train employees to ensure they understand the principles contained within this policy, the risks modern slavery and human trafficking pose to our business and human rights in general.

5.2 Our zero-tolerance approach to modern slavery will be communicated to suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. BREACHES OF THIS POLICY

6.1 Any employee who breaches this policy may face disciplinary action, including and up to termination.

6.2 Company reserves the right to terminate any relationship with individuals and organizations working on our behalf if they breach this policy, any contractual provision, or our Code of Conduct.