



Modern Slavery and Human Trafficking Statement for Financial Year Ending December 31, 2018

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 and improve the security and safety of the food we eat.

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 and Bubble Wrap® brand cushioning. In 2018, the Company generated revenue of approximately \$4.7 billion by helping our customers achieve their sustainability goals in the face of today's biggest social and environmental challenges. We have approximately 15,500 employees and operate through our subsidiaries and have a presence in the United States enabling us to distribute our products to our customers in 123 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, 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.

We are not aware of any breaches of our policies during the last 12 months.

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.

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 2018.
- 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.

Emile Chammas

Emile Chammas
SVP & Chief Manufacturing and Supply Chain Officer