

**Anti-Slavery and Human Trafficking Policy of
Emballator (UK) Limited**

**Unit 1 and 2, City Link Industrial Estate
Phoenix Way
Bradford
West Yorkshire
BD4 8JP**

and

**Unit 3 and 4, Whitehead Business Park
Holland Street
Bradford
West Yorkshire
BD4 8BH**

Dated 1st December 2021

Revision 3.0

Policy Statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. Emballator UK Ltd. has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse, and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, Emballator UK Ltd. accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications. This policy applies to all individuals working for Emballator UK Ltd, or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

Responsibility for the policy

Philip Mann, Managing Director has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations and also is responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Violet Fedorovic, HR Manager has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for Emballator UK Ltd. or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with the Company's whistleblowing policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

Emballator UK Ltd. aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Training and communication

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

Remediation

We acknowledge that remediation can take many forms and will depend on the individual's needs. This is a set of principles which we commit to acting in line with:

- Victim centred remediation - Protecting the victim of slavery will be our first priority. Our approach will be victim led, consultative and involve multiple stakeholders to ensure the best possible outcome for the victim.

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We will be driven by the wishes and needs of a victim unless there is a serious risk of physical harm to that individual, or anyone else as a result of any disclosures made. We have a responsibility to protect them from physical and or serious moral harm and will work with partner agencies to ensure this, even if the victim does not want any action taken.

We will seek to support the victim throughout the process, take steps to protect confidentiality and ensure a timely response. We acknowledge that victims have the right to pursue other forms of remedial action at any stage.

- Treat cases individually – We will treat each victim(s) on a case-by-case basis and take individual circumstances into account when creating a bespoke care plan.
- Follow advice of experts – We recognise that we don't have the specialist expertise to assess and identify what support is needed. In all non-urgent cases, we will first seek approval of the victim to share concerns and/or circumstances with any partner authorities, including the police.
- Collaborative approach with our supply chain - In the instance of modern slavery being detected within our supply chain we are committed to working with suppliers to help eliminate slavery and support those impacted. This would always be our preferred approach; however, this may be reconsidered if a supplier refuses to engage with us. For cases identified in the supply chain, we will ensure the victim has agreed for information to be shared.
- Ongoing victim support – We are committed to exploring opportunities to support victims throughout remediation and would adopt a victim centred approach. Under expert guidance we will assess what remedy we can offer the victim and use our resources to the best of our ability.
- No repeat and adapt our approach - If any potential cases of slavery are raised, we will investigate them fully to understand the root cause of any exploitation and take action to improve our processes to ensure no reoccurrence. We are committed to building new learnings into our future strategy, continually reviewing and adapting our approach to ensure it is appropriate and effective in tackling modern slavery and supporting those impacted. In addition, support will be provided to the individual who raised the concern if required.

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Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

References

Modern Slavery Act 2015

<https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement>