

MODERN SLAVERY STATEMENT 2016

Published in accordance with the Modern Slavery Act 2015

Euro Packaging UK Limited purchases from a global supply base, including the Far East, Turkey and mainland Europe, in addition to UK based suppliers.

Euro Packaging is committed to identifying and working with suppliers whose personal and business ethical standards are compatible with our own. Euro Packaging expects its suppliers to be law abiding as individuals and to comply with local legal requirements in the conduct of all their business activities as well as strive for compliance with international standards to promote increased employee protection. This includes compliance with the specific terms of the Euro Packaging Code of Practice.

This document details the ethical code of practice (based on the ETI Base Code) to be adopted by both our own business and our suppliers. We require our suppliers to promote compliance with the Code of Practice throughout their own supply chain. Where violations of the Code of Practice are found, a corrective action plan will be agreed between Euro Packaging and the supplier which will then be monitored. Failure to comply with this corrective action plan will result in a cessation of trading.

Furthermore, continuous due diligence monitoring is in place via our Supplier Questionnaire, a very detailed set of questions already encompassing quality, ethical trade, applicable legislation, capabilities and commercials. This tool is used to assess any new suppliers and to annually monitor and update existing supplier information and accreditations. Finally, suppliers may be required to undergo a Euro Packaging Internal Audit, in addition to any external third party ethical and technical audits requested by our customers.

Modern Slavery is now recognised as tainting numerous business aspects throughout the world and is one of the most pervasive and serious sources of human rights violations. Consequently, it should be at the heart of any business ethical trading programme, as it is for Euro Packaging UK Ltd.

During 2016 Euro Packaging ethical trade staff attended Modern Slavery training provided by ETI. Subsequently dedicated staff focused on reviewing and updating existing supply chain tools and processes to explicitly include references to Modern Slavery and implementing a zero tolerance approach to non-compliance. Both our Code of Practice and Supplier Questionnaire were updated to raise the Modern Slavery profile within our supply base. The revised documents were then rolled out primarily to the Far East and Turkish suppliers where it was felt that there was a higher level of risk of non-compliance compared to UK and EU supply chains.

In addition, due to our sourcing from Turkey, special attention was given to the broader context of the Syrian refugee crisis. We re-iterated our Code of Practice requirements to our Turkish suppliers and raised Modern Slavery to them as a standalone element, whilst highlighting particularly vulnerable categories of workers such as refugees. They were required to actively acknowledge our Code and confirm compliance, including assurance that the products we source from them are not made by victims of Modern Slavery.

Furthermore, initial and annual internal audits were carried out on our Far East suppliers by our own local staff. In excess of 30 internal audits on quality and social compliance were carried out during 2016, in addition to external third party ethical and technical audits requested by our customers. No Modern Slavery non-conformities were identified during these audits.

Following our own ethical audit conducted at our premises in 2014 and 2015, our audit procedures on temporary workforce agencies were enhanced and updated to include Modern Slavery and to include training requirements for labour providers.

During 2017, we will be reviewing the initial results from the steps taken during 2016. We will make any necessary adjustments and/or improvements to our current processes and expand our scope to include our UK and mainland European suppliers.

Moreover, we will continue the focus within our own organisation by undergoing another ethical audit at our premises to confirm current labour practices. We will drive cross-functional awareness of Modern Slavery within our business, championed by the Senior Management Team, in order to identify and eliminate potential risk areas within our own business.

Statement was approved by the Board of Directors on 27th April 2017

Signed by Director



Sarah Windham Luck, Sales Director