

## **MODERN SLAVERY STATEMENT**

This statement has been published in accordance with the Modern Slavery Act 2015. We have continued throughout 2018 to build on our commitment to prevent slavery and human trafficking within our own business and our supply chains.

### **What do we produce?**

Manufacturing packaging for over 160 years, we are the UK's largest producer and supplier of Paper Bags and Packaging for Retail and Industrial markets.

### **Our Commitment**

We have a zero-tolerance policy towards modern slavery and we are committed to regularly reviewing and continuously developing our approach. We will discontinue business with any organisations which knowingly support or are found to be involved in slavery, servitude and forced or compulsory labour.

We will ensure through our recruitment process that all staff are subject to pre-employment checks, this will include confirmation of the details provided, the confirmation of their identity and the right to work in the UK.

We undertake to use reputable recruitment agencies to support the supply of our workforce and we will carry out regular audits. All new agencies are visited to check their processes before we commit to using them. Registrations are checked directly with the Gangmasters' Licensing Authority where applicable.

### **Supply Chain**

We are focused on working with our supply chain to understand their commitment to the Modern Slavery Act and how it impacts on their business and us as their customer. We have assessed the potential human rights risk of our supply chain by considering our supplier database, identifying major suppliers and have confirmed that they fully understand and comply with our expectations and requirements of them.

A very high percentage of our suppliers are based in the UK or Europe. Most hold accreditations which require regular audits by an issuing authority or they have policies relating to modern slavery and/or codes of conduct that address the issue.

We will continue to work with our supply chain to mitigate risks and monitor our procedures and practices to ensure that there are no human rights abuses in our business operations.

## **Training and Awareness**

We have provided awareness training to our employees working with Stronger2gether, which is a multi-stakeholder initiative aiming to reduce modern slavery, by providing guidance, resources and training. Working with Stronger2gether we have provided training to all our managers and employees. Our induction process is designed to provide information to all new employees and each new employee receives a copy of the Stronger2gether information to ensure that they have a reference document.

In order to promote continued awareness, all employees are provided with updated information at regular intervals.

## **Governance**

As a major supplier of packaging to the UK's leading retailers and brand owners we have joined SEDEX and are regularly audited using the SEDEX Member Ethical Trade Audit (SMETA) which is based on the Ethical Trading Initiative (ETI) and are committed to surpass these standards.

We have established mutual agreement relationships with organisations that are also members of SEDEX.

We have long since had a positive and communicative relationship with our Unionised workforce. Our highest priority remains providing a safe working environment for everyone.

## **Next Steps to prevent modern slavery in our business**

- Review all HR policies and procedures.
- Incorporate a request for Modern Slavery information in our annual check of suppliers.
- Undertake refresher training in line with Stronger2gether
- Establish a confidential Whistleblowing Service
- Undertake audits on supply chain providers who do not have a statement
- SEDEX audit to be undertaken



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