

MODERN SLAVERY STATEMENT

Introduction

This statement sets out Welton Bibby and Baron's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2024 to 31 December 2024 and is published in accordance with section 54 (1) of the Modern Slavery Act 2015.

Our business

We are the UK's largest producer and supplier of Paper Bags and Packaging for Retail and Industrial markets. We employ over 330 people and we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our Commitment

One legal definition of Modern Slavery is that it can take many forms including the trafficking of people, forced labour, servitude and slavery. Children (those aged under 18) are considered victims of trafficking, whether or not they have been coerced, deceived or paid to secure their compliance. Types of slavery today are human trafficking, forced labour, debt bondage/bonded labour, descent-based slavery, child slavery, forced and early marriage and domestic servitude. Our Company continues to be committed to preventing slavery and human trafficking in all activities and to demonstrate this commitment we have completed an Organisational Progress Assessments through Stronger Together and this has demonstrated that we are a low-risk organisation, which is a positive statement to be able to make and excellent news for customers wishing to work with us.

We continue to review our recruitment processes taking into account any changing legislation and ensuring that all new starters have the relevant right to work documents. Utilising the information from Stronger Together to ensure we are delivering a positive message at our induction sessions.

Supply Chains

We purchase a range of goods and services throughout a number of suppliers within a global environment. Each supplier has to demonstrate that they are committed to the highest ethic. We request that our suppliers provide risk free working conditions where employees are treated with dignity and respect. We will terminate any contract that does not achieve the standards we expect.

Relevant Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations. All policies have been reviewed during this year.

- Whistleblowing policy, we encourage all our employees, customer and business partners to report any concerns related to the direct activities or supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline.
- Code of Conduct, our code makes it clear to employees the actions we expect of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- Recruitment Policy which demonstrates our process and checks that will be undertaken. With regard to the use of agency workers, we use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before we accept workers from that agency.
- Human Rights Policy, which covers areas around Labour Rights, Forced Labour (Slavery) and Child Labour.
- We also have important policies on Human Rights, Anti Bribery and Anti-Slavery and Human Trafficking.

Due Diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include

- participating in collaborative initiatives focused on human rights in general, including slavery and human trafficking in particular such as participation in Stronger together initiatives
- Check suppliers regarding their labour standards, compliance in general, and modern slavery and human trafficking in particular.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship
- We work closely with the companies who are supplying our outsourced staffing such as cleaning and security, ensuring in the recent change of security provider, the transfers were handled with the employees at the forefront and that they had the relevant understanding on tackling modern slavery and what training they are providing.

Training

All HR staff have attended relevant training provided by Stronger Together throughout this year, with the HR Advisors attending Tackling Modern Slavery in UK Business and Tackling Labour Exploitation in UK Warehousing and the HR Manager attending The Advanced Modern Slavery in UK Business.

Performance indicators

- Undertake the action plan provided from Organisational Assessment Procedure (OPA) through Stronger Together, which was undertaken on the 19th and 20th June 2024.
- Review training materials used for modern slavery at induction. Review areas to place relevant posters.
- Continue to be members of SEDEX and to learn from audits.
- Produce a Procurement code of conduct,

Remedial Action

If any potential victims of modern slavery are identified then we will notify the relevant law enforcement organisations and work together to resolve issues.

Governance

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

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

If you need help you can contact the Modern Slavery Helpline on 08000 121 700 or you can visit their website at <https://www.modernslaveryhelpline.org>

Nick Tomkins
Managing Director
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