

MODERN SLAVERY STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is published by Welton Bibby and Baron Limited in line with section 54 (1) of the Modern Slavery Act 2015 covering the actions taken during the financial year from 1 January 2025 to 31 December 2025 to seek to ensure that slavery and human trafficking does not take place within our operations or our supply chain.

We have a zero-tolerance approach to modern slavery and human trafficking, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Business Structure

We are the UK's largest producer and supplier of Paper Bags and Packaging for Retail and Industrial markets. We employ over 340 people and we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Modern Slavery – Our Commitment

We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We also expect that our suppliers will hold their own suppliers to the same high standards.

An Organisational Progress Assessments through Stronger Together 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 and covering the following areas:

- The prohibition of child labour
- The prohibition of forced labour, including all forms of modern slavery and human trafficking
- The rejection of any form of unequal treatment and discrimination, in particular with regard to nationality, ethnicity, gender, disability, age, sexual orientation, political affiliation, religion and ideology
- A working environment free from violence and reprisals
- Fair and transparent remuneration that is at least equivalent to the statutory minimum wage.
- Reasonable working hours and sufficient rest periods

- A safe and healthy working environment in accordance with the applicable occupational health and safety obligations and statutory regulations.
- Respect for the right to freedom of association and collective bargaining

Supply Chains

Welton Bibby and Baron Limited works with a number of suppliers within a global environment and we are committed to ensuring that our suppliers will implement due diligence processes to identify, prevent and minimize risks for the violation of human rights and environmental impacts in its own supply chain. In doing so, the business shall require compliance by its subcontractors and other business partners along the supply chain. We will terminate any contract that does not achieve the standards we expect.

Policies and Procedures

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
- Human Rights Policy, which covers areas around Labour Rights, Forced Labour (Slavery) and Child Labour.

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, checking their processes for recruitment and undertaking annual audits.
- With regard to the use of agency workers, we use only specified, reputable employment agencies to source labour and always verify their practices through annual audits.

Training

HR have attended relevant training provided by Stronger Together, 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.
- Review training materials used for modern slavery at induction and reviewing materials available to employees.
- Continue to be members of SEDEX and to learn from audits.

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
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