

MODERN SLAVERY STATEMENT 2018

Published in accordance with Section 54 of the Modern Slavery Act 2015

Euro Packaging UK Limited continues to purchase from a global supply base, including the Far East, Turkey and mainland Europe, in addition to UK 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 Euro Packaging Code of Practice (based on the ETI Base Code and the UK Modern Slavery Act).

Modern Slavery continues to be at the heart of our business ethical trading programme due to its vast potential as a source of human rights violations. Consequently, during 2018, Euro Packaging assessed 2017 activity and took further steps towards preventing Modern Slavery within the business and supply chain.

MODERN SLAVERY STEPS WITHIN OUR BUSINESS

As anticipated in our previous MS Statement, in 2018 we have developed an online portal for labour providers to register temporary workers details and conducted appropriate training. The portal consists of a three-step approach:

1. Initial appraisal of the labour provider with focus on practices relevant to Modern Slavery and thereafter scheduled updates and audits;
2. Timely registration and initial assessment of assigned temporary workers' details by crosschecking addresses, bank account names etc.;
3. Regular checks on existing temporary workforce including review of contracts, payslips, interview etc.

We continue to be engaged in permanent dialogue with the approved labour providers, while regular temporary workforce sessions are held on our premises to allow workers to voice any concerns.

Therefore, the system we now have in place allows us to have full and accurate visibility of the temporary workers on site and their details. This has already proven particularly useful during ethical audits where information must be readily at hand. Moreover, any new labour provider wishing to enter a commercial relationship with us must adhere to the same process. No Modern Slavery issues were identified since this portal was launched.

In addition, our own HR procedures and forms were updated to include more tools for identifying and tackling Modern Slavery issues. The HR team has also increased significantly in terms of resource and undergone specific MS training. Further internal MS training was cascaded from departmental managers to introduce company staff to the reality of Modern Slavery and the company's legal obligations.

Finally, we had our own premises audited against the ETI base code again, with NCs swiftly addressed by a dedicated high-profile cross-departmental team. No Modern Slavery issues were identified during the audit.

MODERN SLAVERY STEPS WITHIN OUR SUPPLY CHAIN

As per previous statements, due diligence monitoring is in place via our supplier questionnaire and bespoke internal audit (technical/ethical) for Far East and Turkish suppliers. In 2018, our supplier questionnaire was further reviewed and streamlined to ensure that relevant ethical questions are included. In addition, we continued to distribute our Modern Slavery pack consisting of a presentation (now available in Turkish, alongside English, Chinese and Vietnamese) and a toolkit to our suppliers. The pack is intended as a tool to raise awareness among factory management and workers, as well as setting expectations and providing concrete actions for the manufacturing sites. An adapted version of the pack is now implemented for indirect buying suppliers, covering internal use consumables.

Also, it became apparent that a better framework was needed in order to maintain flexibility in accommodating and reconciling the ever-increasing market demands related to ethical trade, including Modern Slavery. Consequently, a new vendor matrix covering improved assessment, ranking and continuous monitoring processes has been drafted to be implemented in 2019.

Moreover, we continue to use a market leading third party audit company for our bespoke internal audits on the supply chain. We further reviewed and updated our audit form by adding more Modern Slavery checks aimed at assessing supplier awareness of forced labour and check for any occurrence on the ground. We continued to carry out supplier audits on quality and social compliance during 2018, in addition to external third party ethical and technical audits requested by our customers. Following these audits, no Modern Slavery issues were identified.

During 2019, we will be implementing the new vendor matrix and assess its functionality and impact. We will also conduct more in-depth Modern Slavery training among own staff, as well as undergo more ethical audits at our premises. As in previous years, we are focused on constantly reviewing and improving our dedicated tools based on best practice and right holders' feedback to the best of our ability and knowledge.

We will therefore continue to drive cross-functional awareness of Modern Slavery within our business, championed by the Board of Directors, in order to identify and eliminate potential risk areas within our own business.

Statement was approved by the Board of Directors on 20th March 2019
(for the financial year 2018)

Signed by Director



Date:

20th March 2019

Sarah Windham Luck

Sales Director and member of the Board of Directors approving the statement