

## Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

Although we are currently below the turnover threshold where a modern slavery policy is obligatory, we have decided to voluntarily take up our responsibility, alongside every other right minded business, to do our bit to assist with eradicating this appalling practise.

At Allpack we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain.

The decision to implement this policy was made in November 2020 and therefore there has not been sufficient time to take all the actions that we need to take to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking. This plan outlines the steps that we have taken in 2020 and details the steps that are planned for early 2021.

## Our business and supply chains

Allpack operates in the UK and the bulk of our suppliers and customer are UK based. We specialise in transit packaging of all types.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

## Supplier policy

This year we have updated our purchase agreement to include a Modern Slavery Supplier Policy to make explicit our expectations for our suppliers conduct in reference to slavery and human trafficking. This includes asking the supplier to warrant that:

- It complies with the requirements of the Modern Slavery Act 2015
- It undertakes due diligence for modern slavery on its own supply chain
- What steps Allpack will take if a supplier fails to implement anti-slavery policies or controls

## New supplier due diligence

This year we have launched additional due diligence on all new suppliers during on-boarding and on existing suppliers. This includes:

- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They do not require their employees or contract workers to lodge deposits of money with them, or identity papers, as a condition of their employment
- They don't require employees to surrender their passports or work permits as a condition of employment

## Existing supplier due diligence

This year we have required all key suppliers to attest to their compliance with the Modern Slavery Act 2015, this includes:

- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They do not require their employees or contract workers to lodge deposits of money with them, or identity papers, as a condition of their employment
- They don't require employees to surrender their passports or work permits as a condition of employment

This due diligence will be repeated for existing suppliers on a regular basis.

## Awareness

This year we have raised awareness of modern slavery issues by putting up posters across our facilities and sending a series of emails focused specifically on modern slavery to all our staff, which explain:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery and to assure them that all reports of suspicion of slavery or human trafficking can be made without fear of retaliation.

## Training

Next year, in addition to the awareness programme, we will be rolling out an e-learning course to all employees, which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- What external help is available for the victims of slavery

- An attestation from employees that they will abide by Allpack's anti-slavery policy.

## Risk assessment

Next year we will conduct a risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups

This assessment will determine our response and any additional risk controls that we need to implement.

## Measuring how we're performing

This year we have defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training.
- How many suppliers have filled out our due diligence questionnaire.

This statement covers 1 January 2020 to 31 December 2020 and has been approved by the board of the company.

*George Clark*

**Director**

Signed for and on behalf of the Board 8<sup>th</sup> January 2023