

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 2023 to 31 December 2023 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

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

We have continued to review our recruitment processes to ensure we are compliant with relevant legislation and checking all aspects of right to work documents. We have improved our induction procedure and regularly seek feedback on its effectiveness when undertaking probationary reviews.

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.

- 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.

Supply Chain /Due Diligence

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to confirm that they provide safe working conditions, treat workers with dignity and respect and act ethically and within the law in their use of labour. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

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, and 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 are working with the companies who are supplying our outsourced staffing such as cleaning and security to understand how they are tackling modern slavery and what training they are providing.

Training

HR staff have been booked on to training sessions offered by Stronger Together and these are booked throughout the following year. The training is Advanced Modern Slavery in UK Business for HR Manager, Tackling Modern Slavery in UK Business and Tackling Labour Exploitation in UK Warehousing for other team members.

Following the OPA review, we will assess the feedback on our assessment to additional training required for managers and supply chain staff.

Awareness-raising programme

As well as training staff, we have raised awareness of modern slavery issues by covering it at our induction process and having an open discussion with new employees within their probationary reviews. Making staff aware of the Modern Slavery helpline number.

Performance indicators

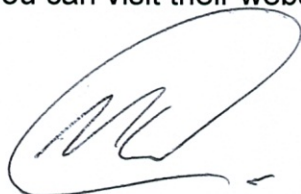
- Undertake an Organisational Assessment Procedure (OPA) through Stronger Together, which is booked for the 19th and 20th June 2024.
- Work through action plan provided following assessment in line with recommendations.
- Review training materials used for modern slavery at induction. Review areas to place relevant posters.
- Complete review of all HR policies and procedures to ensure legislative changes and updates/
- Continue to be members of SEDEX and to learn from audits.
- Training booked for all HR staff. Assess for learning and development.
- Produce a Procurement code of conduct,

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
June 2024