

MODERN SLAVERY ACT STATEMENT

This statement sets out SAICA Group's activities in the UK to understand any potential risks of slavery and human trafficking. By doing so we can ensure that steps are put in place to prevent modern slavery and human trafficking both within our business and in our supply chain. This statement relates to actions and activities during the financial year 1 January 2024 to 31 December 2024.

What is Modern Slavery:

Modern Slavery encompasses a range of situations and encompasses the following:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity, or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement



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Our Organisation Structure and Supply Chain:

Saica Group has four business divisions which work in an integrated cycle to produce sustainable solutions for recycling and waste services: manufacture of recycled paper for corrugated board (Saica Paper), waste management and environmental services (Saica Natur), production of corrugated board packaging (Saica Pack) and flexible packaging (Saica Flex). The divisions comprise of c.20 manufacturing and office locations across the UK.

Our Paper and Pack businesses operate almost entirely within the UK & Ireland. Natur operates predominantly in the UK and Ireland, with some limited sales internationally. Flex operates predominantly in the UK with a proportion of sales and supply internationally.

Consequently, our suppliers are predominantly from within the UK & Ireland although some specialist material supplies are sourced internationally.



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Our Commitment:

We recognise that we have a corporate, social and ethical responsibility to tackle modern slavery and we are committed to doing so. We have a zero tolerance approach and will refrain from entering into business, or will discontinue business, with any organisation we believe may knowingly be involved in any forms of modern slavery in any way.

One of the fundamental principles firmly upheld by our company, which infuses and governs the professional actions of our managers and executives, is legal and ethical behaviour designed to guarantee sustainable growth. The organisation is committed to preventing slavery and human trafficking in its corporate activities and to taking steps to ensure that our employees and supply chains are free from slavery, human trafficking, debt bondage or other forms of slavery.

Saica has committed to the Ethical Trading Initiative (ETI) Base Code (www.ethicaltrade.org) and has maintained and followed an Ethical Trading Statement and Policy. The Statement and Policy, as well as the ETI Base Code, are contained in the Saica Colleague Handbook of the UK and Ireland.

Many of our sites are members of SEDEX and undergo SMETA Audits (Sedex Members Ethical Trade Audit). This is a widely used format for social auditing and enables us to assess both our sites and suppliers to understand and assure compliance with the established Sedex standards of labour, health & safety, environmental performance and ethics.

All employment offered by Saica Group Companies in the UK are on a guaranteed hours basis. We do not offer any zero hours contracts and a competitive package including a range of benefits is offered to all employees.



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Due Diligence Process for Assessing Risk:

Internal Measures:

- An e-learning package has been developed to raise awareness across the organisation of modern slavery risks, including visual signs and indicators of modern slavery, our responsibilities as an organisation and the contribution of colleagues across the business.
- The vast majority of workers are employed directly by SAICA where we have direct control over employment practices, policies and procedures.
- Checks on bank details are built into the HR system, particularly where payment is being made into an account in the name of someone other than the employee.
- We use very low proportions of agency employees, however, where temporary agencies or 3rd party contractors are used, we have a process for validating agency / contractor procedures and employment practices which is externally verified through Sedex audits for many locations.
- Internal communications are placed in our workplaces signposting anyone suffering from modern slavery where to seek support.
- Training has been arranged for key roles, including Human Resources to raise awareness and to ensure understanding of our obligations.
- Training has been carried out for People team colleagues on 'Right to Work' procedures.
- During the recruitment and offer process, we ensure potential employees are aware that relevant documentation will need to be presented.
- Compliance with the Modern Slavery Act is included in our Ethical Trading policy within the Employee handbook.
- Our Code of Ethics and Legal Compliance is communicated to all UK & Ireland employees, as well as taking a place of prominence on our website from which it can be accessed by all customers and suppliers.

Supply Chains:

- E-learning has been developed to raise awareness of modern slavery across Saica, including Procurement colleagues, to ensure understanding of the risks of modern slavery and of our obligations.
- SAICA terms and conditions for suppliers include the requirement to abide by the SAICA Code of Ethics which includes anti-slavery. This covers both new and renewal contracts.
- A new supplier management system has been introduced which ensures that suppliers are aware of and explicitly commit to Saica's compliance standards prior to being accepted as a supplier.

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Compliance:

Saica Group has introduced a Whistleblowing channel which can be accessed via its website, through which any individual, internal or external to the Company, may raise a concern, anonymously if preferred, which will be fully investigated. All those raising concerns are assured that there will be no reprisals from raising a concern in good faith.

The Human Resources department will confidentially investigate any concerns raised regarding modern slavery and human trafficking and will inform the UK Compliance Committee of any matters requiring further action.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes SAICA's slavery and human trafficking statement for the financial year ending December 2024.

Jonathan Kralev

Director – Saica Pack UK Ltd, Saica Paper UK Ltd, Saica Natur UK Ltd, Saica Flex UK Ltd

