FIRST CIRCLE
PACKAGING REIMAGINED



FIRST CIRCLE PACKAGING LIMITED
SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out steps that First Circle Packaging Ltd have taken reasonable steps to ensure that slavery and human trafficking is not taking place in any of its supply chains or part of our business.

Our business

We are a UK manufacturer of HDPE plastic bottles to the dairy and juice industry. The business has multiple sites across the UK and Ireland, including its head office based in Milton Keynes.

Our supply chains

Our supply chain consists of sourcing raw material from approved food grade suppliers and the distribution of our bottles across the UK and Ireland. Due diligence processes for slavery and human trafficking. As part of our initiative to identify and mitigate risk:

- First Circle prides itself on building long term relationships with its suppliers both locally and nationally
- Our values are based around integrity, safety and transparency
- We have systems in place to encourage the reporting of issues or concerns and if necessary, the protection for whistleblowers

Relevant policies

The organisation is committed to ensuring that there is no modern slavery and human trafficking within our supply chains or within our business. Our commitment to integrity and acting ethically in all our business dealings to minimise the risk of modern slavery in our supply chain. First Circle has a number of policies in place:

- Code of Ethics Policy
- Dignity at Work Policy
- Purchasing Policy and Procedure
- Corporate Social Responsibility Policy
- Whistleblowing Policy

Our Code of Conduct sets out the behaviours we expect from employees in their dealings with colleagues, customers, suppliers and agents. All employees and suppliers are expected to act with integrity in accordance with the standards of behaviour set out in the Code of Conduct.

We encourage employees to raise concerns and issues via the Company's grievance Procedure or Whistleblowing Policy. We are committed towards creating a working environment where everyone is treated with dignity and respect and providing equal opportunities for all our colleagues.



We actively encourage and support employee engagement. The Grievance Procedure ensures employees have the opportunity to raise concerns or grievances.

Training

All Directors and Senior Managers have been briefed on the subject and the organisation has a high level of understanding of the risk and issues of modern slavery and human trafficking within our business and supply chains. The Company undertake all reasonable and practical steps to monitor and review, to ensure its suppliers meet our standards and comply with local legislation. This statement has been approved by our Board of Directors, who will review it on an annual basis