

## **Slavery and Human Trafficking Statement January 2023**

### 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, including many in developed countries, 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.

At Swan Mill Group of Companies (SM), 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. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2023 / 2024.

### **Structure and supply chains**

SM manufactures, procures and distributes disposable products, gift packaging and greetings cards for the tableware and gift markets. It operates from several sites across the UK and also has offices in Hong Kong. Napkin manufacture is based at the Swanley site and manufacture of Gift wrap and other seasonal products is at Hirwaun in South Wales. In addition, there are four trading businesses, Ling Design and The Great British Card Company (GBCC) Ltd supplying Greeting cards and Castleview Enterprises supplying back of house and janitorial products, Swantex Asia is a sourcing house.

As well as manufacturing in the UK, SM source a range of associated products globally.

### **Policies on modern slavery**

SM is committed to a work environment & supply chain free from human trafficking, forced labour and harmful child labour in compliance with The Modern Slavery Act 2015.

The company will not support or deal with any business knowingly involved in slavery or human trafficking and, as such, requires all our suppliers to adhere to the legislation.

SM operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.

- Procurement Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.

We updated our Procurement Code of Conduct to make explicit reference to slavery and human trafficking.

### **Due diligence**

We undertake a range of audits, supplier visits and inspections, appertaining to this and other aspects of ethical and social business practices. We will also write to our suppliers asking them to confirm they have zero tolerance for slave labour and human trafficking.

SM conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

### **Risk assessment**

Risk assessments will be undertaken relating to specific suppliers in industries and regions where there are less stringent Government controls.

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
- News analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.



### **Training for staff**

SM has updated and rolled out an e-learning course as part of the employee induction training which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem
- 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

Personnel responsible for ensuring these policies are implemented and adhered too will be trained to the required standard.

SM is regularly audited by external accredited bodies for compliance with ETI (Sedex), BRC and ISO 9001 requirements.

By increasing supply chain accountability, more workers will be protected and consumers will have greater confidence in the goods and services they buy. That is why the transparency in supply chains provision is world leading and will bring about the change that is so needed.

It is our intention to formally review our annual slavery and human trafficking statement for each financial year and will encourage our suppliers to do likewise.

This statement covers 3<sup>rd</sup> January 2023 to 30<sup>th</sup> June 2024 and has been approved by the board of SM.

Balwinder Singh Gill  
Procurement Director