



Modern Slavery Statement

1. Introduction

This statement is made by ProAmpac Grimsby Ltd. It is a statement made in accordance with section 54 of the Modern Slavery Act 2015 and covers the period from November 2022 to October 2023. ProAmpac Grimsby Ltd is a company which strives to do things in the right way and as a business we recognise our responsibility to be aware of the risks of modern slavery and human trafficking within our own organisation and supply chain.

2. Background

Our manufacturing processes and offices are based in Grimsby, UK. We employ approx. 260 staff members, undertaking a range of roles including, sales, manufacturing, finance, IT, HR, Engineering, warehousing and logistics. We supply to, and buy from, mainly the UK and mainland Europe.

We do not use any temporary agency labour on site. Our recruitment process includes using reputable recruitment agencies. We may outsource certain services where specific expertise may be required and a number of non-key activities, such as engineer support, site maintenance and logistics.

We have carried out a review of our direct supply chain and have concluded that the risks of modern slavery and human trafficking are low. However, we acknowledge that we must remain vigilant to the risks and ensure that our vendors understand and play their part in ensuring that modern slavery and human trafficking does not take place in our organisation or supply chains.

3. Relevant Policies

To further our commitment to combating slavery and trafficking, we have policies in place, which set out our zero tolerance approach to modern slavery both within our own operations and our supply chain:

We have in place a Social Compliance Policy and Human rights and Ethical Trading Policy, which applies to all our operations and those in our supply chain which refers to our zero-tolerance stance on modern slavery.

We have procedures in place when engaging with new vendors, contractors and business partners to ensure that they are aware of and will adhere to our Social Compliance Policy and Human Rights and Ethical Trading Policy and to assess the likelihood of slavery or trafficking existing in those organisations and what measures are already in place to combat those risks.

We have reviewed our existing policies and are making amendments to recognise our obligations under the Act including our Whistleblowing Policy.

4. Risk assessment processes

We have considered the risk of modern slavery in our own operations and we have concluded that, on the basis that we are a UK employer subject to UK employment protections and practices and already have well developed checks and balances within our business, we have a low risk of modern slavery occurring in our own operations.

Our suppliers which fall into the following categories are strongly encouraged to commit and adhere to Ultimate Packaging standards, which include a requirement to abide by the Ethical Trading Initiative base code.

- Substrates (e.g. films, paper)
- Coatings (e.g. inks, solvents, adhesives)
- Subcontractors

We are currently in the process of approving the following suppliers, with regards to Ethical Trading.

- Consumables (e.g. boxes, pallets)
- Suppliers of services associated with our product (e.g. hauliers, laundry supplier)
- Contractors

We have considered the risk of modern slavery occurring in our use of employment agencies for permanent placements on site. Given the organisations that we work with and the existing checks that we apply in these areas we have concluded that the risks of modern slavery are low in this area.

5. Due diligence processes

In order to prevent slavery and trafficking in our business and supply chains, we are taking steps to update and improve our supplier due diligence process. This includes integrating and acting upon the findings of our risk assessment processes described above and taking action to embed zero tolerance of modern slavery and trafficking.

6. Training

To raise awareness of slavery and trafficking and of our policies and procedures we are developing an approach to training key staff members in this area.

7. Measuring effectiveness – performance indicators

In order to monitor the effectiveness of the steps we have taken and are intending to take to stop slavery and trafficking taking place in our business and supply chains, we intend to use the following performance indicators for the year ahead:

- We intend that key members of staff will receive relevant training, as referenced above.

- We will display Stronger Together and Ethical Trading Posters to our employees and include Ethical Trading information within the induction process for all new starters.
- Where we assess that there may be a heightened risk of slavery and trafficking within other organisations, we will take appropriate measures to encourage and persuade them to adopt their own measures to minimise the risks of slavery and trafficking within their own organisations and the supply chain beyond.

As referenced in this statement, we will monitor the need for further action to be taken and other key performance indicators to be implemented as we continue our risk assessment and due diligence activities and get responses from our key suppliers.

This statement has been approved by the Board of Directors, who will review and update it annually.

Signed on behalf of ProAmpac Grimsby Ltd.

A handwritten signature in dark ink, appearing to read 'J. Hodson', with a long horizontal stroke extending to the right.

Jeremy Hodson

Managing Director

Date: 1st November 2022