

Our Commitment

This statement is made by Sofidel UK Ltd on its own behalf and on behalf of its subsidiaries, Sofidel Ireland Limited and Sofidel Sweden AB (hereafter referred to as “Sofidel”) operating in the UK as part of the Sofidel Group of companies, pursuant to s54(1) of the Modern Slavery Act 2015 and constitutes Sofidel’s modern slavery and human trafficking statement for the financial year from 1st January to 31st December 2024.

At Sofidel we pride ourselves on being a responsible and ethical business committed to always acting with integrity with our customers, suppliers, employees and the communities within which we operate.

Sofidel is committed to conducting business in a manner that respects the dignity and human rights of all people and to improving our practices to combat slavery and human trafficking in our business and supply chain. We acknowledge our responsibilities and obligations arising from the Modern Slavery Act 2015 (the “Act”) and we do not tolerate any conduct that encourages, facilitates or contributes to human trafficking, forced labour (including child labour) or any other human rights abuses.

Sofidel’s Organisation Structure:

Sofidel UK Limited & Sofidel Ireland Limited are both part of Sofidel Group, which was founded in 1966 and is now one of the world leaders in the tissue paper production market for hygienic and domestic use: toilet paper, kitchen paper, napkins, tissues and handkerchief). It’s best-known brand, available in several countries, is Regina, which stands alongside other prestigious brands.

From its headquarters in Porcari (Lucca), Sofidel Group coordinates the activities of 21 companies throughout Europe and the United States, which produce nearly two million tonnes of paper each year and provides 9,000 people with employment. Sofidel UK Ltd employs approximately 860 staff across its four sites in the UK.

The Group’s daily business includes the creation of value based on a profound sense of respect for the world we live in.

Supply Chain

Whilst the Group’s supply chains are extensive due to its global reach, Sofidel UK Limited’s supply chains are primarily focused within the UK.

The primary operations within these supply chains are warehousing, raw material supply and the transportation of finished goods. All of our warehousing is UK based and the majority of transportation is provided by UK based companies. Some raw materials are brought in from outside the UK by transport companies that have been checked and scrutinised by the Group.

We’re continuing to focus on policies and procedures that make sure slavery and human trafficking doesn’t take place in this chain and we will continue to assess how we engage with current and new suppliers to ensure it is eradicated in our supply chains or in any part of our business.

Preventing modern slavery

In order to ensure that we comply with our responsibilities under the Act and to identify and mitigate risk, we have continued to look at activities in 3 key areas – *policy, risk assessment* and *due diligence*. The steps we have taken include those set out below.

Policy

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. On a global level the Sofidel Group sets out its guiding principles and values in its Code of Ethics publication. The Group also sets and enforces effective systems and controls to ensure the same high standards from the majority of its suppliers, contractors and other business partners and, as part of its contracting processes. In addition, the Group uses its influence to promote and support human rights through its involvement in the United Nations Global Compact initiative. At a local level our recruitment policies are compliant with all local legislation, including the Immigration, Asylum and Nationality Act 2006, the Immigration Act 2014, and the Immigration Act 2016 which sets out the UK's requirements for preventing illegal working. These policies are reviewed annually.

As part of a review of its employment policies, Sofidel maintains a Modern Slavery and Human Trafficking Policy which is applicable to all employees, officers, directors and suppliers. This sits alongside other policies relevant to this issue (including a whistleblowing policy and grievance policy and a human rights policy) as part of a suite of measures designed to uphold our commitment to the Act.

Risk Assessment

Sofidel has determined that due to the policies and initiatives outlined above the risk of slavery or trafficking in our supply chain is low. The majority of our raw materials and finished goods are transported within the UK or Europe. The key exception to this is our paper pulp which is sourced from various countries worldwide. However, the risk here is also low due to the approaches taken by the Group's purchasing department and the fact that the majority of our suppliers and contractors have been evaluated using sustainability questionnaire TenP Paper.

Sofidel's policy regarding labour is to use permanent employees wherever possible and to limit the use of agency labour. We do not employ staff aged under 18 unless it is part of an apprenticeship programme run by a registered UK further education establishment. If in the unlikely event it is discovered that an employee, worker or contractor is under the age of 18 (who is not part of an apprenticeship programme), the HR team will immediately notify the relevant local authority. Sofidel carries out an internal HR audit annually which, amongst other things, looks to identify and eliminate forced or compulsory labour in our workforce.

As a sign of our commitment to respecting human rights, Sofidel is a member of SEDEX. We are audited using SMETA, which is one of the most widely used social audit procedures in the world. These independent audits ensure our systems and standards are legally and ethically compliant and are properly and sufficiently maintained.

We are also audited by our clients as part of their approach to ensuring compliance with the Act.

Due Diligence

To ensure that all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. Sofidel uses the “*TenP Paper*” self-assessment as the tool for evaluating suppliers in terms of this along with sustainability. This questionnaire was developed by the Global Compact Network Foundation based on the 10 founding principles of the United Nations Global Compact. It provides companies with a prequalification system by filling out an online self-assessment questionnaire on environmental and social sustainability performance in 4 different areas. These 4 areas are Human Rights, Labour Rights, Environmental Responsibilities and the Fight Against Corruption (Business Ethics).

We continue to undertake annual due diligence exercises in relation to the recruitment agencies we use to obtain our temporary labour; this is done internally on an annual basis through screening and a review of their policies and procedures. It has the aim of greater transparency and partnership between the parties.

Measuring Effectiveness

Sofidel uses the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking has not taken place in our business or supply chains:

- The majority of suppliers, contractors and partners must demonstrate effective policies and controls in their TenP Paper assessments;
- Integration of prequalification questionnaires with a specific Modern Slavery declaration to be required from our suppliers – Sofidel will require suppliers to sign a declaration affirming their commitment to combatting Modern Slavery;
- All employees (temporary and permanent) are screened through the gathering of references, basic DBS checks and checks on the individual’s right to work in the UK;
- All reported breaches under Sofidel’s Whistleblowing Policy are recorded, acted upon and reported each year;
- The number or percentage of staff trained in relation to anti-slavery and human trafficking.

In July 2024, following the adoption of the Corporate Sustainability Due Diligence Directive (CSDDD) and EU deforestation Regulation 1115/2023 (EUDR), Sofidel launched a comprehensive review of its supply chain due diligence processes. The CSDDD, in particular, mandates a risk-based approach to value chain management, requiring the identification, assessment, and mitigation of adverse impacts on human rights and on the environment.

To align with the directive’s requirements, the Procurement Department at a level Group has developed a new framework for supplier risk assessment and monitoring, which will be implemented starting from the first quarter of 2025.

This updated system also aims to ensure greater alignment with international standards on Modern Slavery, whose specific aspects have been integrated into the revision of the process. The implementation of the new supplier management system will begin in Q1 2025 and is expected to be fully completed by early 2026.

Training and communication

A training programme on the issue of modern slavery, and on the risk that the business faces from modern slavery in its supply chains, has been implemented and completed by the majority of staff, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

As mentioned above, measures will be taken to require our suppliers to sign a declaration as part of the prequalification process to confirm their commitment to eradicating Modern Slavery.

Sofidel will continue to work with its most relevant suppliers to implement educational initiatives and submitting training material to raise awareness of their Modern Slavery obligations and to further promote ethical practices.

The Company's zero tolerance approach to modern slavery will continue to be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

This statement was approved by the Board of Sofidel UK Limited on 12/06/2025.

Signature:



Date: 05/06/2025

Nicolo' Stefani

Director, Sofidel UK Ltd