# Modern Slavery Act 2015

**Introduction**

This statement sets out Premier Paper Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking

**Organisational structure and supply chains**

This statement covers the activities of Premier Paper Group:

- Premier Paper Group is a paper merchant distributing paper and other print media to businesses and organisations throughout the UK via local sales and logistics teams.

- Premier Paper deals with many leading paper manufacturing companies with the majority of its products being made within the EU and a lesser quantity being made in non-EU countries.

**Risk Assessment**

An assessment of slavery and human trafficking within the organisation shows the risk to be extremely low.

**Responsibility**

Responsibility for our anti-slavery initiatives is as follows:

- **Policies**: We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

- All Directors and Senior Managers are responsible for compliance in their respective departments and for their supplier relationships

**Relevant policies**

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in it's Company:

- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise them with their Line Manager or contact the HR Manager.
- **Charter Corporate Behaviours/Employee code of conduct** - Our Charter makes clear to employees the actions and behaviour expected of them when working and representing our Company. We strive to maintain the highest standards of employee conduct and ethical behaviour.
- **Supplier/Procurement Standards** - We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- **Recruitment/Agency workers** - Our recruitment and employment practices operate within the UK laws and all direct employees undergo a "right to work" checks. The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

**Due diligence**

The majority of the products that we sell are sourced within the EU with some sourced from paper mills based in non EU countries. All of our products are manufactured by leading global companies with robust ethical business practices. Generally, we consider it a low risk that our suppliers do not conform to the requirements of the Modern Slavery Act 2015.

Premier Paper Group holds FSC and PEFC chain of custody status. All products that Premier sells conform to EUTR and the vast majority carries FSC or PEFC accreditation. These standards help confirm that our supplier are meeting the social and ethical criteria required for certification.

However, we have introduced a supplier audit questionnaire to evaluate our supply chain, but we believe due diligence is an area where we can improve further. We aim to review new suppliers, as well as reviewing existing suppliers, which includes certification and accreditation status. Based on this we assess and review the supply chain to consider particular product and/or geographical risk of modern slavery and human trafficking.

Where Premier Paper Group identifies indicators of modern slavery in its supply chain, it will work with the relevant supplier to help implement effective measures to address the issue. If compliance with the code is suspected or proven to have been breached by any supplier, Premier Paper Group reserve the right to request open and effective cooperation and will take corrective remedial action as well as the final option to terminate the commercial agreement if necessary.

**Training and Awareness to our Employees**

Premier Paper Group have communicated our Modern Slavery Policy to all our employees, providing them with information on how to identify and report potential slavery within the workplace

We have also provided all of our employees with information on how to identify signs of slavery in everyday life, along with details on how to report this outside of our Company.

**Group CEO Approval**

This statement was approved by the Company's Group CEO who will review and update it annually.



**Michael Beever Group CEO**

**August 2022**

Premier Paper Group Ltd. Head Office,
Midpoint Park, Kingsbury Road, Minworth, Birmingham, B76 1AF
**t** 0121 313 1115 **f** 0121 313 3508 www.paper.co.uk
Registered in England and Wales No. 3672117. Registered Office as above