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 Ltd:

- Premier Paper Group Ltd 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.

Premier Paper Group Acquisition's
Premier Paper Group subsidiary business's, Wine Box Company Ltd (WBC), Graphic & Paper Merchants Ireland Ltd (GPMI), Graphic & Paper Merchants Northern Ireland Ltd (GPMI) and Reilly Plastics Ltd are also committed to preventing slavery and human trafficking activities within their own supply chains.

- WBC is a wholesale supplier of packaging, display and fabric bags to the specialist drink and food market.

Current certifications WBC hold include, Supplier Ethical Data Exchange (SEDEX) and the Achillies Network to which WBC attained silver level recognition. These, alongside their Ethical Business Policy, make reference and commitment to ensuring no modern slavery or human trafficking exists in their supply chains, or any part of the business, and they refrain from entering in to business with anyone found to be non-compliant.

- GPMI supply paper, board, plastics and the latest technology solutions to graphical printers and converters.

- Reilly Plastics Ltd supplies plastics to a wide and varied customer base including food processing/ servicing industry as well as engineering firms.

GPMI and Reilly Plastics Ltd have their own Modern Slavery Statement which will be reviewed and updated as appropriate.

Risk Assessment

Whilst the subsidiaries of Premier Paper Group are not required under Section 54 of The Modern Slavery Act to produce an annual statement; we are reviewing the new subsidiary policies to ensure they are consistent in standards to those of Premier Paper Group and will be taking the appropriate action to align policies and procedures for the Group.

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 have an established onboarding process for new suppliers that includes their written adherence to our policies, including Modern Slavery. We have also conducted an exercise to retrospectively seek these written assurances from existing suppliers.

- **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 Department.
- **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 is meeting the social and ethical criteria required for certification.

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.

This statement relates to actions and activities during the financial year 1st January 2023 – 31st December 2023.

Group CEO Approval

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



Michael Beever Group CEO