

Modern Slavery Statement

1. Organisation and structure:

- 1.1. This statement applies to Sharpak Aylesham (referred to in this statement as 'the Company'). The information in this statement refers to the financial year 2024-2025.
- 1.2. The Company is based in Aylesham, Kent, with sister sites in Bridgwater, Yate, and Romsey. All sites are part of the wider UK Division and are owned by Groupe Guillin and are headquartered in Ornans, France. The Company is run by a board of Directors where all company policies, including this statement, are agreed at this level.
- 1.3. The main activities of the Company and wider group is the manufacture of thermoformed plastic packaging for food and non-food use. The Company mainly services the Fresh Produce markets in the UK, and as such has a degree of seasonality in the manufacture of the products.

2. Definitions:

- 2.1. The Company considers that modern slavery encompasses:
 - 2.1.1. Human trafficking.
 - 2.1.2. Forced work, through mental or physical threat.
 - 2.1.3. Being owned or controlled by an employer through mental or physical abuse, or the threat of abuse.
 - 2.1.4. Being dehumanised, treated as a commodity or being bought or sold as property.
 - 2.1.5. Being physically constrained or to have restriction placed on freedom of movement.

3. Commitment:

- 3.1. Sharpak Aylesham acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.
- 3.2. The Company does not enter business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.
- 3.3. No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking and strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.



4. Supply chains:

- 4.1. The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains
- 4.2. The Company does not enter business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.
- 4.3. No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

5. Potential exposure:

- 5.1. The Company considers its main exposure to the risk of slavery and human trafficking to exist in the use of supplying goods to the produce and agriculture industries due to the higher prevalence of exploitation as a result of the seasonality of the sectors.
- 5.2. In general, the Company considers its exposure to modern slavery and/or human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business, nor the business of any organisation that supplies goods and/or services to it.

6. Steps:

- 6.1. The Company carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.
- 6.2. The Company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.
- 6.3. In accordance with section 54(4) of the Modern Slavery Act 2015, the Company has taken the following steps to ensure that modern slavery is not taking place:
 - 6.3.1. reviewing all supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
 - 6.3.2. reviewing measures in place to identify and assess the potential risks in its supply chains.
 - 6.3.3. undertaking impact assessments of its services upon potential instances of slavery.
 - 6.3.4. creating action plans to address risk to modern slavery.
 - 6.3.5. any actions taken to embed a zero-tolerance policy towards modern slavery.



7. Key Performance Indicators:

- 7.1. The Company has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Company or its supply chains:
 - 7.1.1. review supplier contracts to include termination powers in the event that the supplier is, or is suspected, of being involved in modern slavery.
 - 7.1.2. review measures in place to identify and assess the potential risks in the Company supply chain.
 - 7.1.3. Review and update the company Modern Slavery Policy in the financial year 2023/24
 - 7.1.4. Assessing supplier risks of modern slavery through the use of SEDEX.

8. Policies:

- 8.1. The Company has the following policies which further define its stance on modern slavery: modern slavery policy and procedure, ethical policy, anti-bribery policy, employment of agency workers policy and procedures.

9. Training:

- 9.1. The Company provides training to leadership and sales teams to effectively implement its stance on modern slavery through its policies and statement and approach to mitigating risks with its customers, suppliers and other business partners.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

This statement has been approved by the Board of Directors and signed off by Justin Rigden, Head of HR.

First Published: January 2017

Reviewed & Authorised by the Board of Directors: January 2025