Modern Slavery Policy
Progress Packaging 10/10/2022

What is Modern Slavery?

Modern slavery is the illegal exploitation of other people for personal or commercial gain. There varying types including Human Trafficking and Forced labour. Further information on Modern Slavery can be found on the Anti-Slavery International Charity's website.

The most common forms of modern slavery are as follows:

- **Human trafficking:** The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.
- **Forced labour:** Any work or services people are forced to do against their will under threat of punishment.
- **Debt bondage/bonded labour:** The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.
- **Descent–based slavery:** Most traditional form, where people are treated as property, and their "slave" status was passed down the maternal line.
- **Slavery of children:** When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery.

Our structure and our business overview

Progress Packaging Limited is a independent company that operates as a production house, supplying our end customers with goods that have been produced via our approved supply base internationally**.** We rea committed to sustainable production and the highest of ethical practices

Our supply chain overview

Progress Packaging purchases luxury packaging from an existing supply base in the UK, EU and China.

Our policies

This Modern Slavery policy highlights that we are committed to acting ethically and with integrity in all our business dealings and relationships; and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Progress Packaging Limited is fully committed to human rights in the workplace as shown in our Human Rights Policy and this extends to our **zero tolerance approach to modern slavery, in all forms that it takes**.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the **Modern Slavery Act 2015.** As part of this commitment, we expect the same high standards from all of our contractors, suppliers and other business partners.

To further highlight the commitment we take at Progress Packaging Limited across our supply chain to tackle Modern Slavery, we have the following policies and processes currently running in our company:

- **Code of Conduct** - sets out what we expect from every single person working for and with Progress Packaging. It also underlines our responsibilities to our people, partners and shareholders.

- **Anti-Bribery** - sets out the responsibilities of both Progress and our partners in regard to observing and upholding our zero-tolerance positions on bribery and corruption

- **Whistleblowing** - we have implemented a process where employees can anonymously report legitimate concerns with the business and our supply chain. More details of this are made available to all our employees via our Staff Handbook.

- **Supplier Code of Conduct -** all suppliers are to now sign this code before we commence proceedings with them (and all suppliers whom we had contracted prior to this implementing this code have since signed). Part of this code highlights are expectations on how a supplier treats their employees and their support for the protection of internationally proclaimed human rights, fight forced labour (including modern slavery and human trafficking) and child labour.

- **Human Rights Policy -** this lays out are commitment to human rights in the workplace, respecting the dignity and worth of all employees, and our zero-tolerance approach to child labour and modern slavery.

Who does this policy apply to?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Our Due Diligence

When contracting with new and existing suppliers, they are required to sign and adhere to our Supplier Code of Conduct to confirm that they also operate a zero-tolerance approach to exploitation and actively request that all our new suppliers/contractors comply to the requirements of the Modern Slavery Act 2015. If we become aware of any breaches, then we will make it clear to our suppliers and contractors that we will terminate contractual terms as a result of the breach.

We have specific commitments on preventing child labour, promoting labour rights in agricultural supply chains and helping to ensure good conditions of work and employment. We monitor suppliers' compliance with our requirements through initiatives including third-party audits, independent assessments, and contractual and relationship reviews.

Our steps in assessing and managing risk

Our Modern Slavery policy is reviewed annual as part of our Ethics Risk Assessment which is stored on our ISO system. In addition, this is added to our new supplier approval process under our code of ethics and requires signing before we onboard new suppliers.

Progress Packaging has a fully up to date set of policies that protect and enshrine the rights of our own staff. Our Supplier Approval Process and Ethics Review is in place to ensure that our chosen suppliers, especially those outside the UK, share our values and commit to the same policies.

We aim to keep abreast of changes in any relevant legislation through our own research and the advisory role of our B Corp management partners.

The effectiveness of our approach

All suppliers and contractors are evaluated and are required to complete a questionnaire, this information is assessed and all approved suppliers and contractors and added to our approved suppliers' databases. We can only do business with suppliers and contractors on this list.

We require all of our suppliers to re-sign this code on an annual basis, and inform them of any updates in the code at this time. This further showcases our expectations of them.

Our training for Employees

Upon joining Progress Packaging we will notify you on the existence of this policy, as well as on the risk our business faces from modern slavery in its supply chains. We will ensure you have adequate training to spot any suspicious activity that may be regarded as modern slavery, and ensure you are aware of the correct procedure to follow if this occurs - as indicated above. Any updates will be provided using established methods of communication between Progress Packaging and you, and to ensure familiarity with this policy, we share our Modern Slavery policy on an annual basis with all employees.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

What occurs in a Breach of Policy?

Any employee who breaches this Policy by engaging in or conspiring to engage in any Modern Slavery conduct will face disciplinary action. This could, in the most severe circumstances include immediate dismissal for misconduct or gross misconduct and, if warranted, legal proceedings may be brought against the employee under the Modern Slavery Act 2015.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy, and again, if warranted, legal proceedings may be brought against the individual/company in question under the Modern Slavery Act.

How can I comply?

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

We encourage you to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager OR company Director OR report it in accordance with our Whistleblowing Policy which can be found in our Staff Handbook as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our “Grievance Process” which can be found in our Staff Handbook.

Who is responsible?

Progress Packaging has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Progress Packaging has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training (this training will be organised by us, Progress Packaging on it and the issue of modern slavery in supply chains.

As always, we open our doors and actively encourage you to comment on this policy and suggest ways in which it might be improved. For any comments, suggestions and/or queries on the Modern Slavery policy to please reach out to Simon Farrow (MD).

This policy and statement relates to the financial year 2022-2023 and will be updated on an annual basis. This policy and statement is approved by Progress Packaging’s MD- who will also be part of the review process.

Signed

SIMON FARROW _____

Simon Farrow
10/10/2022