



Policy Name	Allpack Modern Slavery Policy
Policy Number	POL-05
Purpose	To ensure compliance with the Modern Slavery Act 2015 and operate within an ethically responsible fashion
Supporting Documents	Modern Slavery Act 2015
Supporting Forms	N/A
Supporting Systems	N/A
System approved by	George Clarke

Policy
<h2>Our commitment to the Principals of the Modern Slavery Act 2015</h2> <p>Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.</p> <p>At Allpack we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. As an equal opportunities' employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our employees. We want our employees to feel confident that they can expose wrongdoing without any risk to themselves.</p> <p>Allpack's recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion whilst working for Allpack.</p> <p>We do not enter into any business with any organisation, in the UK or overseas, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.</p> <h2>Our business and supply chains</h2> <p>Allpack operates in the UK and the bulk of our suppliers and customer are UK based. We specialise in packaging of all types.</p> <p>We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the</p>

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supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references. We are members of SEDEX and Ecovadis that monitor this commitment through yearly reviews of our systems, statements and actions.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Supplier policy

Our purchase agreement and supplier set up questionnaires as monitored by ISO and BRCGS, include a Modern Slavery Supplier Policy agreement to make explicit our expectations for their conduct in reference to slavery and human trafficking. This includes asking the supplier to warrant that:

- It complies with the requirements of the Modern Slavery Act 2015
- It undertakes due diligence for modern slavery on its own supply chain
- What steps Allpack will take if a supplier fails to implement anti-slavery policies or controls
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They do not require their employees or contract workers to lodge deposits of money with them, or identity papers, as a condition of their employment
- They don't require employees to surrender their passports, or work permits as a condition of employment

This due diligence is repeated for existing suppliers on a regular basis as monitored by our standards bodies.

Awareness / Training

All employees as part of induction and refresher training are educated on the points below

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- What external help is available for the victims of slavery
- An attestation from employees that they will abide by this policy.

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Risk assessment

We conduct an annual risk assessment of our supply chain taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups

This assessment will determine our response and any additional risk controls that we need to implement.

Measuring how we're performing

We have defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training.
- How many suppliers have filled out our due diligence questionnaire.

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