

## Modern Slavery Compliance

Coveris

May 2017

## Slavery and Human Trafficking Statement

### **Introduction**

We are proud of the steps we have taken to combat slavery and human trafficking and we are committed to constantly reviewing and improving our practices to combat slavery and human trafficking.

### **About Us**

Coveris UK Flexibles Ltd. part of the Coveris Group. Responsible for the supply of paper, cardboard and flexible packaging solutions, we work with a long established, approved network of suppliers across each of our product divisions to ensure we deliver the most responsible products for our customers. Coveris remain vigilant towards imported goods and materials from outside of the UK and EU and their increased risk of slavery/human trafficking issues, operating a rigorous supplier monitoring programme to counter this.

### **Our Policies on Slavery and Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we monitor ethical standards across the business on a regular basis both internally and via external third party audits. Site are compliant with ETI Base Code, and undergo unannounced SEDEX Ethical Trade Audits. These are supported by our own annual Ethical verification audits. This activity is also supported by our Equal Opportunities Policy, and our commitments to ensuring the safety of our employees.

### **Our Supply Chains**

Supply chain security and integrity is a crucial component of the business model. Robust technical and traceability systems ensure that our products are responsibly sourced from suppliers whose values are aligned with our own. Our terms require that our direct suppliers comply with all applicable laws and regulations. This includes anti-slavery and human trafficking legislation. We have proactively communicated to all our suppliers to ensure our suppliers understand and comply with this legislation.

As a company we use Labour Providers (temporary worker agencies) to supply a percentage of our workforce. Each Labour Provider is audited by trained ethical auditors periodically. Within these audits, the ETI Base code and controls around Modern Slavery are reviewed. We always monitor, assess and mitigate the potential risk areas in our supply chains and have robust systems in place to deal with such risks.

### **Whistleblowing Policy**

The business also has a Whistleblowing Policy and a confidential, independently operated hotline for our employees to voice any concerns that they have, and this can be run concurrently in line with site Grievance



policies. The Whistleblowing policy and hotline number is displayed at all sites to ensure that all employees and temporary workers have access to it.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2017.

**Jonathan Pallas**  
**Group Human Resources Director**  
**Coveris UK Food & Consumer**

Dated : 3<sup>rd</sup> May 2017