

Rigid UK Policy

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Modern Slavery Policy

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Contents

1. Status of this policy
2. Why combatting forced labour matters
3. Our responsibilities
4. What we are doing
5. Employee responsibilities
6. Monitoring effectiveness

1. Status of this policy

This policy sets out Coveris Rigid UK Ltd.'s policy on combatting forced labour in our business and in our supply chain. The term forced labour used in this policy includes slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

We oppose the use and exploitation of forced labour and we expect all those who work for us or on our behalf to share our zero-tolerance approach.

This policy applies to all those who work for us and those who work on our behalf, including employees, agency workers, casual and freelance staff.

This policy is not part of any contract of employment and does not create contractual rights or obligations. It may be amended at any time.

2. Why combatting forced labour matters

Forced labour is a global problem. It affects over 20 million people around the world. Taking steps to tackle forced labour protects vulnerable workers and helps prevent human rights violations.

We do not tolerate forced labour within our business. Eradicating forced labour is consistent with our ethical principles and is important to protect our reputation, sustain investor and consumer confidence and secure our commercial position.

3. Our responsibilities

The Human Resources Department is responsible overall for ensuring that this policy and our annual slavery and human trafficking statement (see below) comply with our legal and ethical duties.

The Human Resource Department has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, answering queries on it and auditing internal processes aimed at ensuring that forced labour is not taking place in our business or our supply chains. The Human Resource Department is also responsible for preparing the annual statement and presenting it to the Head of Human Resources for approval.

The Modern Slavery Act 2015 requires commercial organisations over a certain size to publish a slavery and human trafficking statement each financial year, disclosing the steps an organisation has taken to ensure that slavery and human trafficking is not taking place in its supply chain or its business (see Appendix 2).

4. What we are doing

We are confident that we employ no forced labour directly within our business. However, we regularly review that and also assess our supply chain with a view to ensuring that there is no use of forced labour within the supply chain.

We take the following steps to prevent, evaluate and address risks of forced labour in our supply chain:

- We have established a Supplier Code of Conduct (see Appendix 1) with which we expect our suppliers to comply. We may impose contractual obligations requiring compliance;
- We review our supply chains annually to evaluate forced labour risk and, if a risk is identified, we take appropriate steps to address it; and
- We consider the conduct of each supplier against the Supplier Code of Conduct when awarding and/or renewing business with the supplier.
- We train personnel working with our supply chain on forced labour and the Supplier Code of Conduct, with a view to reducing the risks of forced labour in our supply chain.

5. Employee responsibilities

Managers are responsible for ensuring that this policy is applied within their area of responsibility.

Our employees are expected to be alert to any indicators of forced labour in our business or supply chain.

We do not tolerate any forced labour within our business. If you suspect that there has been a breach of this policy or if you have any concerns regarding the issue of forced labour in any part of our business or our supply chain, you should notify your line manager or report it in accordance with our Whistleblowing policy as soon as possible.

6. Monitoring our effectiveness

We will review this policy to ensure that it is operating effectively. Where concerns have been raised through this policy, we will consider how they have been handled and if appropriate follow up action has been taken.

APPENDIX 1

SUPPLIER CODE OF CONDUCT

FORCED LABOUR

Coveris Rigid UK Ltd opposes the use and exploitation of forced labour. We expect all those who work for us or on our behalf to share our zero-tolerance approach.

References in this Code to “forced labour” include slavery, servitude, and any type of forced or compulsory labour as well as trafficking for the purposes of exploitation.

Accordingly, our expectations of suppliers are as follows:

1. Suppliers must not use forced labour.
2. If requested by us, suppliers will complete a self-assessment questionnaire provided by us regarding the use of forced labour and the steps they have taken to ensure that neither they nor their supply chain make use of it. Suppliers will provide us with a copy of the completed questionnaire.
3. Suppliers will allow us to audit compliance with this Code by inspecting their facilities, reviewing records, policies and practices and interviewing personnel. Suppliers are expected to provide prompt access to their facilities, records, documentation, and personnel.
4. If we identify any non-compliance, suppliers must prepare, permit us to review and execute an improvement plan approved by us to rectify matters.
5. Suppliers will place similar expectations to those set out above on their own suppliers.

We may require compliance with this Code of Conduct in our contracts with suppliers and may also require that they impose equivalent obligations on their own suppliers.

Subject to any contractual terms, we may terminate our supply relationship if a supplier fails to comply with this Code of Conduct. If appropriate, we may report any breach of the Code of Conduct to the appropriate authorities.

If you have any concerns, or are aware of any suspected violations of this Code of Conduct, please notify the Human Resources Department immediately.

APPENDIX 2

COVERIS SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending 31/03/2017.

Introduction

Coveris Rigid UK LTD is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

Our organisational structure and operations

With over 60 manufacturing locations and more than 10,000 dedicated employees, Coveris is a global leader in the manufacturing of packaging and engineered coatings for a variety of consumer and industrial end-use markets.

We are a part of the Coveris Group and our parent company, Sun Capital have its head office in Florida, USA.

Nature of our supply chains

Our Group's key supply chains involve plastic raw materials and plastic cutlery. These are sourced mainly from the UK and mainland Europe, but are also sourced from Asia.

Policies relating to slavery and human trafficking

Our Modern slavery policy reflects our commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains, and to acting ethically and with integrity in all our business activities and relationships.

We ensure that our suppliers are aware of our policies and take appropriate measures to ensure that our suppliers adhere to the same high standards.

Risk assessment

We use the following processes and information/resources to assess which of our own activities and supply chains represent the highest risks in respect of slavery or human trafficking.

- We have established a Supplier Code of Conduct with which we expect our suppliers to comply. We may impose contractual obligations requiring compliance;
- We review our supply chains annually to evaluate forced labour risk and, if a risk is identified, we take appropriate steps to address it; and
- We consider the conduct of each supplier against the Supplier Code of Conduct when awarding and/or renewing business with the supplier.
- We train personnel working with our supply chain on forced labour and the Supplier Code of Conduct, with a view to reducing the risks of forced labour in our supply chain.

We seek to continually review the operations of existing suppliers in relation to the risk of modern slavery and human trafficking.

Due diligence processes in relation to slavery and human trafficking

In order to monitor and mitigate the risks of slavery and human trafficking occurring within our supply chains we aim to undertake the following due diligence processes in relation to all suppliers.

As part of setting up a new supplier, we request the potential supplier to complete a questionnaire covering the following:

- Information covering business processes and personnel
- Ethical trading standards;
- Is employment freely chosen?
- Are working conditions safe and hygienic?
- Is child labour used?
- Are living wages paid?
- Are working hours excessive?
- Is there any harsh or inhumane treatment practiced?

Where practical, site visits are arranged to check working conditions and staff facilities as part of the supplier audit.

The supplier must meet selected criteria prior to being authorised to supply Coveris. Once the supplier is set-up, the questionnaire process is repeated every 12 months.

Staff training

We facilitate training to key staff to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively operate our policies and procedures aimed at mitigating this risk.

We also require our key business partners and suppliers to provide such training to their own staff.

We make specific provision in our whistleblowing policy for the protection of those who whistle-blow in relation to an issue of modern slavery.

Monitoring of our due diligence processes

We use annual audits and customer/employee feedback to monitor how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.