



## **Mpac Group plc**

### **Group Anti-Slavery Policy**

#### **Introduction**

The Board of Mpac Group plc is committed to the Group operating in an ethical way that is free from slavery, servitude, forced or compulsory labour and human trafficking (“human trafficking and slavery”). This Anti-Slavery policy sets out the general rules and principles to which the Group adheres. All employees are required to read, acknowledge and abide by this policy.

This policy identifies the steps that the Group will take to try and eradicate instances of human trafficking and slavery by any other business with whom the Group has a relationship (and particularly from within its supply chain). The Board will support each site with the reinforcement of this policy; how the Group tackles human trafficking and slavery is something that will evolve over time and incremental changes and adaptations will be included within it as appropriate.

#### **What is human trafficking and slavery?**

**Slavery** is behaviour on the part of an offender as if he/she has ownership of a person which deprives the victim of their freedom.

**Servitude** is the obligation, imposed by force, to provide services. The victim is often obliged to live at another person’s property and changing his or her position is impossible.

**Forced or Compulsory Labour** involves coercion, either by direct threats or violence or through more subtle forms of compulsion. Work or service is exacted from the victim under threat of a penalty.

**Human trafficking** occurs when one person arranges or facilitates the travel of a potential victim with a view to exploiting that person. The offence can be committed even where the victim consents to the travel e.g. by the promise of a better life or job. In addition, the exploitation of a potential victim need not have taken place for the offence to be committed as arranging or facilitating the movement of an individual, with a view to exploiting them, is enough.

#### **The Law**

Modern Slavery is a crime resulting in an abhorrent abuse of human rights. In the United Kingdom, the Modern Slavery Act 2015 is designed to ensure corporate accountability for labour practices in supply chains.



## **Steps we can take to prevent human trafficking and slavery**

### **1. Risk assessment**

Effective risk assessment is critical to the success of this policy. By identifying the risk of human trafficking and slavery in particular situations, the Group can evaluate and mitigate the risks and seek to protect against them.

Risk assessments should be periodic, informed and documented. The type of risks that will need to be considered include the:

- country risk, as some countries where the Group operates are more vulnerable to slavery and human trafficking
- sector or industry risk, which parts of the business may be vulnerable to slavery and human trafficking
- business or transaction risk, the need to assess whether particular relationships or transactions are susceptible to slavery and human trafficking
- product or raw materials risk

### **2. Setting specific requirements for Suppliers**

For the purpose of this policy, the term 'Suppliers' includes suppliers, distributors, contractors, subcontractors and/or business partners.

Suppliers must comply and confirm that they:

- do not and will not use forced or compulsory labour
- will not engage in any practice of slavery, servitude, forced labour, compulsory labour or human trafficking either within or outside the UK
- will ensure that their terms of employment are entered into voluntarily
- will adhere to any applicable minimum working age requirements in the countries in which they operate
- will adhere to any applicable minimum wage requirements in the countries in which they operate
- will adhere to any applicable working time requirements in the countries in which they operate
- will use their best endeavours to ensure that any suppliers or subcontractors used by them in the provision of goods and/or services also comply with these requirements.

### **3. Effective monitoring and control**

Each site must maintain an effective system of monitoring its Suppliers. If human trafficking and slavery risks are identified and highlighted through the risk assessment process then procedures must be adopted to mitigate these risks.



Each local Managing Director or Site Director must ensure its local management engages in effective risk assessment and implements the necessary steps to seek to prevent human trafficking and slavery. If so requested, Suppliers must be able to demonstrate compliance with this policy to the reasonable satisfaction of the local Site or Managing Director. The local management team may perform periodic audits on this policy and Suppliers are expected to fully cooperate with any such audit.

#### **4. Looking out for key indicators of human trafficking and/or slavery**

Whilst there is no typical victim of human trafficking and/or slavery, key indicators include:

- Does a person possess their own passport, identification and travel documents or are these in the possession of someone else
- Does a person act as if they were instructed or coached by someone else or do they allow others to speak for them when spoken to directly
- Was a person recruited for one purpose but is now being forced to do some other job
- Does the person receive little or no payment for the work that they do
- Does a person have unexplained injuries
- Is a person dropped off and picked up for work so that their movements are controlled
- Is a person withdrawn or frightened
- Is a person in a situation of dependence
- Has a person been physically or emotionally harmed or deprived of necessities such as food, sleep, medical care, etc.

All employees of the Group should familiarise themselves with these key indicators and be vigilant against anything else which raises a suspicion of human trafficking and/or slavery.

#### **What to do if you have a concern about a suspected or an actual instance of human trafficking and/or slavery**

The Board has appointed the Group Company Secretary as its compliance officer who is responsible for managing and overseeing the Group's compliance with this policy.

The Managing Director or Site Director together with their senior management team is responsible for compliance with the requirements of this policy within their business.

If you have a concern, please speak up and alert the Group as soon as possible. Your concerns may relate to the Group or to any of its Suppliers.

In the first instance you should refer the matter to your Managing Director or Site Director or if that is not possible, for whatever reason, then you should report it to the Group Company Secretary, the Chief Executive or through the Group's confidential whistleblowing helpline. Full details of this service are contained in the Group Ethics Policy which is available from the Group Company Secretary or can be found on the Group's website [www.mpac-group.com/packaging-company/mpac-group-policies](http://www.mpac-group.com/packaging-company/mpac-group-policies).



On receipt of a report, the Group will investigate any alleged instances of human trafficking and/or slavery. It will assist also the appropriate authorities with their investigations and any subsequent prosecution. The Group will take appropriate action against any person or Supplier who is found to be or has been engaged in human trafficking and/or slavery or who refuses to co-operate with any audit to verify compliance with this policy. Appropriate action against a Supplier may include the immediate termination of its contractual arrangement with the Group without compensation. The Group shall take such other steps as the Board shall determine to be necessary to address the violation and seek to prevent its reoccurrence.

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