

PACCOR 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 for the financial year ending 31/12/2021.

Introduction

PACCOR UK Limited 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

PACCOR UK Limited is registered in Scotland and has its main business address in Chester-le-Street (England).

We are a part of the PACCOR Group and our ultimate shareholder, Lindsay Goldberg, has its head office in the USA. With 18 manufacturing locations, 9 sales offices, 2 Centers for Development and Innovation and more than 3,700 dedicated employees, PACCOR Group is a global leader in the manufacturing of packaging and engineered coatings for a variety of consumer and industrial end-use markets.

Nature of our supply chains

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

Policies relating to slavery and human trafficking

The Paccor Group has established a Human Rights policy and a Modern Slavery policy which are applicable to our business.

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.

Through the Global Standards for Suppliers policy document, we communicate to our suppliers our expectations in regards with compliance with our ethics of business, including the Paccor Group position in combatting modern slavery. 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. A revised version of the Global Standards for Suppliers (renamed Code of Conduct for Business Partners) is in place since January 2022.

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 for major suppliers 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 PACCOR. Once the supplier is set-up, the questionnaire process is repeated and in any event not less than every 12 months for critical suppliers.

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. The Paccor Group has implemented a policy manager module linked to the

PacEthics helpline to facilitate communication and training of Paccor employees on the Modern Slavery policy. First trainings via this module are expected to be held in 2022.

We also require our key business partners and suppliers to provide such training to their own staff. We make specific provision in our policies 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. In addition, a whistleblowing tool allowing anonymous reporting on these subjects, inter alia, by Paccor employees and third parties alike has been set up at www.convercent.com.

This statement has been approved by the Board of PACCOR UK Limited on 15 February 2022.



