

Purpose

Foxpak Flexibles Ltd. is committed to ethical trading. Modern Slavery is a criminal offence under the Criminal Law (Human Trafficking) Act 2008 Ireland. Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. The purpose of this policy statement is to establish clear guidelines to identify good ethical trading practices and reduce the risk of modern slavery occurring within our supply chain or business operations.

Scope

This policy will be applied to all Foxpak stakeholders including Employees, Customers, Suppliers and any sub-contractors acting on behalf of Foxpak Flexibles Ltd.

Policy Statement

Foxpak Flexibles Ltd. has a zero-tolerance approach to poor working conditions and unfavourable employee policies in our supply chain and is committed to preventing acts of any form of employee mistreatment from occurring throughout the company and supply chain.

Foxpak is dedicated to the prevention of Modern Slavery and Human Trafficking within our business and throughout our supply chain. We shall:

- identify, monitor and assess those areas of our business and supply chain most at risk from Modern Slavery and implement initiatives to enhance risk management effectiveness.
- engage with our Supply Chain at the outset of our relationship to convey the importance of this policy as any non-compliance found may result in termination of contract.
- Continue to subscribe and be an official member of the *Sedex* – a leading ethical trade membership organisation, working with businesses to improve working conditions in global supply chains. Membership number: **ZC202532744**.

Our Supply Chain

We are committed to our corporate social responsibilities at a local, national and international level. We internally review our supply chain to assess both human trafficking and slavery risks. We review all aspects of the supply chain including but not limited to human trafficking, child labour and safety. We have a sound document management system that ensures all steps of the supplier approval process are followed. We recognise and understand the complexities associated with the existence of modern slavery and its potential impact on global supply chain networks and we are committed to working with our Suppliers, Customers, Regulatory Authorities and other parties and organisations, support the development of long-term solutions to this issue and its abolition. Our Purchasing team is fully committed and focused on ensuring that we purchase materials only from legitimate certified companies that meet all appropriate legislation and are not in any way engaged in or associated with Modern Slavery or Human Trafficking.

Our Workplace

Foxpak Flexibles Ltd. places a high value on each and every one of our employees. We offer a work environment where there are equal opportunities, fairness, inclusiveness, mutual respect and diversity.

Our Policies

Our policies and procedures are continually reviewed to enable a supportive, safe and accident-free workplace. Our employees are at the centre of our health and safety programmes where we work collaboratively together to achieve the objective of Zero Harm across the organisation.

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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. This Statement 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. We internally review our supply chain to evaluate human trafficking risks and slavery risks and we review all aspects of the supply chain including safety, human trafficking, child labour and other legal requirements. We are members of *Sedex* (Supplier Ethical Data Exchange) and audited by third parties – see above.

Review of Policy

Foxpak will review this policy on an annual basis, where it may be revoked, replaced or changed at any time to adhere with any new legislative amendments.

Definitions

Slavery	<ul style="list-style-type: none"> • the state or condition of being a slave; a civil relationship whereby one person has absolute power over another and controls his life, liberty, and fortune. • The subjection of a person to another person, especially in being forced into work. • The condition of being subject to some influence or habit. • work done in harsh conditions for low pay.
Human Trafficking	<ul style="list-style-type: none"> • Article 3, paragraph (a) of the Protocol to Prevent, Suppress and Punish Trafficking in Persons defines Trafficking in Persons as the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.
Due Diligence	<ul style="list-style-type: none"> • the degree of care that is to be reasonably expected or that is legally required. • an assessing, evaluating, etc. conducted with prudent or necessary care.
Supply Chain	<ul style="list-style-type: none"> • a channel of distribution beginning with the supplier of materials or components, extending through a manufacturing process to the distributor and retailer, and ultimately to the consumer.
Sub-Contractor	<ul style="list-style-type: none"> • A subcontractor is a person or firm that has a contract to do part of a job which another firm is responsible for.

Signed: *Foxpak Flexibles Ltd. Management*

Date: Jan 2021

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