

# Elopak UK Limited: Modern Slavery Statement

## 1. Organizational Structure and Supply Chains

This statement is made pursuant to the Modern Slavery Act 2015 (“MSA”). It sets out what Elopak UK Limited (“**Elopak UK**”) has done to ensure that slavery and human trafficking is not taking place within its business or supply chains.

Elopak UK is a subsidiary of Elopak AS, a Norwegian company and is part of a global corporation with operations on all continents. Elopak UK’s principal activities are the selling of beverage cartons, and installation, and maintenance of equipment required to fill such cartons.

Our supply chains are predominately European. Our cartons are produced at Elopak production plants in Denmark and the Netherlands where key raw materials are mainly sourced from Sweden, Finland, Germany, the Netherlands, Switzerland, France and Belgium. Our caps are sourced from third party suppliers based in Germany, Luxembourg, Hungary, Spain and the UK. Any equipment we source, is via a German based Elopak company, that ultimately will come from Italy or Japan.

The installation and maintenance of equipment at our customer’s sites is undertaken by Elopak UK engineers or engineers from other European companies in the Elopak Group or third-party engineering companies in the UK or Ireland.

## 2. Policies in relation to slavery and human trafficking

At Elopak, we intend to uphold the highest ethical standards in all our business operations. We work from a simple, yet comprehensive and effective set of values: We think clearly, act dynamically, and always behave with integrity.

Elopak is committed to maintaining high ethical standards in all business operations and has zero tolerance against harassment and any type of behaviour that may offend or cause unpleasantness to other stakeholders.

Elopak respects and promotes human rights as defined by the United Nations in the 30 articles of the common standard, Universal Declaration of Human Rights. Elopak expects the same from the company’s suppliers and business partners.

- All employees must comply with our **Code of Conduct and Anti-Corruption Policy (“CoC”)**. Our CoC outlines our commitment to behave with integrity towards employees, communities, and other business partners of Elopak. The CoC is our commitment to always act in accordance with acceptable ethical standards, take responsibility for our actions and ensure that the entire company complies with local laws and regulations in the countries we operate.

[https://www.elopak.com/wp-content/uploads/2019/12/CodeOfConduct\\_English.pdf](https://www.elopak.com/wp-content/uploads/2019/12/CodeOfConduct_English.pdf)

- All Elopak employees sign a Pledge of Secrecy – Confidentially agreement as part of their formal employment contract with Elopak. The employee signs an agreement that states that they will follow codes of behaviour in respect of ethical dilemmas defined by Elopak in its CoC, which is also to be found on Elopak’s web site <https://www.elopak.com/about/our-social-responsibility/>

Employees and external stakeholders are encouraged to report any discovered misconduct and unethical business conduct through their line management or through an on-line reporting system. This is done securely and confidentiality via the **Elopak Whistle-blower** - the external whistleblower channel with KPMG, Norway. The service provided by KPMG ensures that Elopak employees and external stakeholders can report their concerns confidentially and anonymously with no ability to trace back to the notifier.

### 3. External partnerships

Elopak holds several memberships in various organisations that gives us perspective and useful insights in order to influence and improve our sustainable business practice and positive impact on societies.

- To improve our practices and to build transparency with our customers Elopak is a member of **Sedex**, the Supplier Ethical Data Exchange. **Sedex** is a non-profit membership organization and collaborative platform focusing on driving improvements in supply chains in the areas of labour rights, human rights, health & safety, the environment and business ethics.
- Since 2017 Elopak are continuously reporting and monitoring its Corporate Social Responsibility (CSR) performance on the sustainability rating platform **EcoVadis**.
- Elopak is a member of **Ethical Trade Norway**, a Norwegian member based, non-governmental organisation and resource centre for sustainable business practice and trade. **Ethical Trade Norway** provides guidance, training, tools and capacity building, to secure responsible business practices in the supply chain with focus on securing human rights, workers' rights, society and environmental standards. They also require all members to report annually on sustainable business practice performance and development in accordance with their minimum requirements and reporting standard.

### 4. Responsible Sourcing

Elopak is committed to conducting business in a responsible manner and to account for social and environmental aspects in our value chain. Responsible sourcing is a key strategic objective and is reflected in our procurement policy and practise.

Our Corporate Procurement functions is a mix of central and local teams. Our key raw materials are sourced centrally while sourcing of equipment, components, parts and services to our customers in addition to goods and services to our own production sites are sourced both centrally and locally.

#### *Supplier Code of Conduct*

Elopak has established a global **Supplier Code of Conduct ("SCoC")**, setting forth our expectations in the areas of business ethics, human rights, labour practices, health and safety and the environment. It is based on the ten principles of the UN Global Compact, the UN Declaration of Human Rights and core ILO (International Labour Organization) conventions and compliance with applicable law.

The SCoC clearly outlines that a supplier must respect basic human rights in its business and supply chain and must adhere to the SCoC principles with regards to forced labour, freedom of association,

the right to collective bargaining, child labour, fair and equal treatment, working hours, wages and benefits and regular employment.

<https://www.elopak.com/wp-content/uploads/2019/12/FOR10202-Elopak-Global-SCoC.pdf>

#### *Assurance process and risk assessment*

Elopak requires its suppliers to comply with SCoC and to implement corresponding measures in their own supply chains. The SCoC forms an integral part of all contracts and agreements with suppliers and functions as an integral part of the Supplier Qualification process.

Elopak Category Managers and Local Purchasing Managers are responsible for continuously ensuring that all our suppliers sign our SCoC or demonstrate conformance by documenting that corresponding policies or codes are in place, as part of all new and renegotiated contracts with Elopak.

As part of the supplier qualification and performance monitoring process all new suppliers undergo a prequalification review including SCoC engagement.

If a supplier informs or we through audits or other means become aware of any non-conformance and/or the suppliers' own framework and supporting documentation is not sufficient and in line with the Elopak SCoC, a plan of remedy with a clear timeline is agreed between both parties. Where a deviation cannot be improved or remedied, the business relationship may be renegotiated or terminated by Elopak.

Transparency and credible proof of sustainability is key to us, therefore we also ensure that the main raw materials, paperboard and renewable plastics, are sourced and verified through certifications systems, also considering social aspects, such as FCS™ and ISCC. For these raw materials stricter criteria for sourcing activities are specified in separate procedures.

We are currently reviewing our supplier on-boarding, qualification and performance monitoring process which will be developed further to consider social and environmental aspects and further evaluate compliance with our Supplier Code of Conduct. This will be done through self-assessments and common industry assessment tools.

#### **5. Key Performance Indicators to measure effectiveness of steps taken**

A supplier evaluation and performance assessment is performed as a minimum on an annual basis based on KPIs relevant to the supply category.

Compliance with the procedures described are monitored through Key Performance Indicators.

By 2018 approximately 95 % of our Raw Material suppliers and in total 75 % of all suppliers (by spend) had either signed our SCoC or demonstrated conformance.

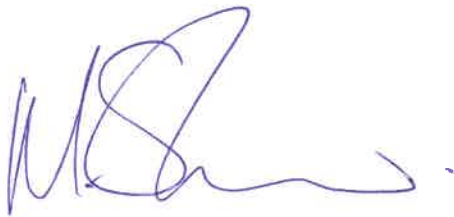
## 6. Training

All employees receive an invitation to do **PureEthics**; our Code of Conduct and Anti-Corruption Policy e-learning program in order to continuously focus on ethical behavior and compliance. Elopak asks all employees to perform the program every year as a mandatory task and Corporate HR monitor the completion.

A more in-depth dilemma training workshop concept has also been developed for selected target groups; upper management group in legal units, employees in sales, marketing, purchasing and finance. Implementation of the workshops in 2019 are followed-up by Corporate HR.

The Procurement team has received introduction and initial training in Responsible Sourcing. To increase awareness and knowledge further trainings and activities will be developed and performed. Key Responsible Sourcing experts have conducted more detailed trainings.

This statement was approved by the Board of Directors of Elopak UK Limited on 7 January 2020 and signed on their behalf by;

A handwritten signature in blue ink, appearing to read 'MS', followed by a long horizontal flourish.

Martin Shaw  
Director  
Elopak UK Limited