

Modern Slavery Statement



This statement has been written in accordance with the requirements of the UK Modern Slavery Act 2015. This statement outlines VPK Packaging's commitment, actions and activities regarding efforts to combat slavery and human trafficking within our business and value chain during the period of 1st January 2021 to 31st December 2021.

About VPK Packaging

VPK Packaging is one of the UK and Ireland's largest independent box and container manufacturers, with facilities based in Desborough (Northamptonshire), Selby (North Yorkshire), Wellington (Somerset) and Limerick (Ireland). Our converting services range from high volume transit cases, ecommerce packaging to retail ready packaging and we can assist in all box design requirements.

The UK and Ireland operations were formerly known as Rigid Containers Limited (first established in Desborough in 1907). In 2000, Rigid Containers was acquired by the VPK Group (family owned). Employing over 6200 people across 65 locations in 20 countries, the group records a turnover of €1.5 billion. In 2020 Rigid rebranded to VPK Packaging Ltd.

VPK Packaging produce corrugated products manufactured using test and kraft papers to produce single and double walled fibreboard, utilising recycled and recyclable material. The products are intended mainly for use as secondary packaging but, Wellington also produces product for direct food contact and all products will meet all relevant legal requirements in accordance with this intention.

Statement

The Company is a leading provider of corrugated packaging in the UK & Ireland with four manufacturing sites. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. To that end, we have a series of mechanisms and responsibilities throughout the business as detailed below.

Policies

To affirm our commitment, we have policies in place to help eliminate the potential use of slavery and human trafficking. Aligned with our global commitment to ethics and compliance, these practices are enforced through the company's Code of Conduct, which outlines our expectation of all employees and serves to foster a culture of compliance and transparency within the organisation. In addition to employees, all stakeholders within the our supply chain are also required to operate in a manner that is compliant with all applicable laws and are subject to certain operating standards. Our Code of Conduct includes topics that range from equal and fair treatment, health and safety, conflicts of interest, protecting our information, anticorruption, and financial and reporting integrity.

Risk Management & Governance

We strive to create open channels of communication throughout the organisation to ensure all employees feel valued and respected. We ensure all employees are aware of our policies through the on-boarding process, training and communication throughout the year.

We encourage employees to raise concerns in line with our Whistleblowing Policy, which clearly indicates a number of mechanisms available to make confidential disclosures. No employee will be victimised for raising a legitimate matter under this procedure.

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Supply Chain

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. We expect our suppliers to conduct business with ethical standards consistent with our own; which includes treating each other fairly, with dignity, and respect; avoiding actual and potential conflicts of interest; and safeguarding all Company assets.

As part of our BRC accreditation we have a group/ local approved suppliers list, which involves Self Assessment Questionnaires (SAQ), approval forms and proof of certifications. Supplier auditing will occur where deemed necessary, along with trial orders. Supplier performance is monitored through complaint analysis and contract management

Training & Awareness

The Company has identified all relevant employees, and assigned reoccurring training on modern slavery as a module within the Company's wider training programme.

The Company's modern slavery training covers:

- Recognising forms of modern slavery;
- Recognising the purpose and reasons for the existence of the Modern Slavery Act 2015;
- Identifying what a company's slavery and human trafficking statement should contain;
- Recognising aspects of modern slavery and the requirements of the Modern Slavery Act 2015.

As well as training, the Company raises awareness of modern slavery issues by making information available to employees which is located on SharePoint or can be obtained from the HR Department. The information explains:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking; and
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Company.

Looking forward, we plan to maintain our commitment to combatting slavery and human trafficking by continuing to develop resources, refine our goals, and educate our employees and stakeholders across relevant areas of our business and supply chain.

We look forward to continuing this process and continue to work within the industry to make an impact within our sphere of influence.

This statement was approved on 1st January 2021 by the Company's Senior Leadership Team, who review and update it annually.

A handwritten signature in black ink, appearing to read 'D Richardson'.

David Richardson
Managing Director – UK & Ireland