

## MODERN SLAVERY, HUMAN TRAFFICKING & LABOUR POLICY

This policy applies to all persons and organisations working for Sav-eco Packaging or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, agents, contractors and suppliers.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Sav-eco Packaging Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We are also committed to continuous improvement. We expect that our suppliers will hold their own suppliers to the same high standards.

Sav-eco Packaging adopts a clear 'Code of Conduct' as follows:

- Prohibiting any form of forced labour or trafficking (referred to as Modern Slavery)
- Prohibiting the use of child labour
- Prohibiting charging of recruitment fees to workers
- Prohibiting the with-holding of worker identity or immigration documents
- Requiring that workers are provided with a safe and healthy working environment
- Workers are engaged in compliance with applicable employment laws and codes of practice including working hours
- Permitting freedom of association and the right to collective bargaining
- Prohibition of bribery and corruption

### **Commitments**

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery and any breaches of the ILO (International Labour Organisation) core principles, in our own organisation and our supply chain.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking including pro.

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- Consistent with our risk based approach we may require
  - a) employment and recruitment agencies and other third parties supplying workers to our company to confirm their commitment and compliance with our Code of Conduct
  - b) suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the same Code of Conduct.
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that suppliers, individuals or organisations working on our behalf have breached this policy or any element of our Code of Conduct, we will ensure that we take appropriate corrective action which may include considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach, through to terminating such relationships and reporting the breach to the relevant authorities.

As a company we are committed to adhering to applicable compliance requirements but also to the continual improvement of our performance.

**Faizali Dharamshi**  
**Managing Director**  
**September 2019**