

Modern Slavery, Human Trafficking and Human Rights Policy

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1. Introduction

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

Mpac Group plc strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We 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, and it is our expectation that our suppliers commit to holding their own suppliers to the same high standards.

Respecting human rights is a fundamental part of our ethos and values as an organisation.

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 in our 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.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply.
- We take a risk-based approach to our contracting processes and keep them under review.
- Consistent with our risk-based approach we may require:
 - ✓ employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Supplier Code of Conduct.
 - ✓ Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Supplier Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this Policy we will ensure that we take appropriate action.

Definitions:

- **Modern slavery** is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services.
- **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.



- **Servitude** is the obligation, imposed by force, to provide services. The victim is often obliged to live at another person's property and changing his or her position is impossible.
- **Forced or Compulsory Labour** involves coercion, either by direct threats or violence or through more subtle forms of compulsion. Work or service is exacted from the victim under threat of a penalty.
- **Human Rights** are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

2. Mpac's structure, business & supply chain

Mpac is a global leader in customer-orientated, high-speed automation and packaging. Our automation systems enhance complex manufacturing lines, helping businesses adapt and grow.

As an international business, the parts and products Mpac sells are sourced from a broad range of national and international suppliers therefore the ethical procurement of goods and services plays a big part in the success of our business. We have various policies and management processes in place to ensure that all of our suppliers and third parties comply with the Modern Slavery Act 2015. We will ensure that our direct suppliers, and where possible their sub-contractors, are absolutely committed to preventing Slavery within their own activities and through their own supply chain. Our contracts and agreements allow for termination in the event of non-compliance.

Mpac currently operates in the UK, Canada, USA, the Netherlands and Asia. We adhere to local laws in the countries in which we work. Respecting human rights is a fundamental part of our ethos and values as an organisation.

3. Policies

Mpac maintains a suite of established formal policies, these include:

- Modern Slavery and Human Trafficking Policy
- Group Ethics Policy
- Speak Up (whistleblowing) Policy
- Equal Opportunities Policy
- Recruitment and Selection Policy
- Safeguarding Policy
- Supplier Code of Conduct

Policies are regularly reviewed and ratified by our Executive Board as applicable. The policies are communicated to all employees to inform them of the standards to which both Mpac staff and suppliers must adhere, and the mechanisms available to staff and suppliers to report issues/concerns. These mechanisms include the provision of a confidential, independent whistleblowing hotline, and a dedicated email inbox.



4. Recruitment and our people

We have a variety of policies and procedures in place to ensure compliance with UK employment law. Our Human Resources team manage recruitment activities with recruiting managers and only use reputable employment agencies and job boards to source candidates. We carry out appropriate background checks including Right to Work for all fixed term and permanent appointments.

5. Risk assessment and due diligence

Effective due diligence is imperative in helping to prevent human trafficking and slavery. It allows us to assess the risk and aids better visibility and understanding of our supply chain. Mpac's approach to human rights due diligence is actioned through a process of:

- Check; We assess the actual and potential risk posed to our business
- Act; If risks are identified we do not ignore them, we act to mitigate or remove the risk completely
- Review; We continually monitor, review and improve our systems to help safeguard our business from financial, operational and reputational risks

6. Looking out for key indicators of human trafficking and/or slavery

All employees of the Group should familiarise themselves with this policy and be vigilant against anything which raises a suspicion of human trafficking and/or slavery.

What to do if you have a concern about a suspected or an actual instance of human trafficking and/or slavery

If you have a concern, please speak up and alert the Group as soon as possible. Your concerns may relate to the Group or to any of its Suppliers.

In the first instance you should refer the matter to your Managing Director or Site Director or if that is not possible, for whatever reason, then you should report it to a member of the ELT, the CFO or CEO or through the Group's whistleblowing email address speakup@mpac-group.com. If you are concerned about raising the matter directly, you can use the Group's confidential whistleblowing helpline or website. Details can be found in the Group's "Speak Up" Policy or on information posters at each of the Group's sites.



Content to be included elsewhere – Supplier Code of Contact, training materials etc

Setting specific requirements for Suppliers

For the purpose of this Policy, the term ‘Suppliers’ includes suppliers, distributors, contractors, subcontractors and/or business partners.

Suppliers must comply and confirm that they:

- do not and will not use forced or compulsory labour
- will not engage in any practice of slavery, servitude, forced labour, compulsory labour or human trafficking either within or outside the UK
- will ensure that their terms of employment are entered into voluntarily
- will adhere to any applicable minimum working age requirements in the countries in which they operate
- will adhere to any applicable minimum wage requirements in the countries in which they operate
- will adhere to any applicable working time requirements in the countries in which they operate
- will use their best endeavours to ensure that any suppliers or subcontractors used by them in the provision of goods and/or services also comply with these requirements.

Risk assessment and due diligence

Each site must maintain an effective system of monitoring its Suppliers, including considering modern slavery and human trafficking in assessments of new and existing suppliers and requiring suppliers to confirm periodically their approach to preventing modern slavery and human trafficking in their businesses and supply chains. If human trafficking and slavery risks are identified and highlighted through the risk assessment process then procedures must be adopted to mitigate these risks.

Each local Managing Director or Site Director must ensure its local management engages in effective risk assessment and implements the necessary steps to seek to prevent human trafficking and slavery. If so requested, Suppliers must be able to demonstrate compliance with this policy to the reasonable satisfaction of the local Site or Managing Director.

Training will be provided to employees as appropriate to help them identify and deal with instances of modern slavery and human trafficking.

Looking out for key indicators of human trafficking and/or slavery

Whilst there is no typical victim of human trafficking and/or slavery, key indicators include:

- Does a person possess their own passport, identification and travel documents or are these in the possession of someone else
- Does a person act as if they were instructed or coached by someone else or do they allow others to speak for them when spoken to directly
- Was a person recruited for one purpose but is now being forced to do some other job
- Does the person receive little or no payment for the work that they do
- Does a person have unexplained injuries
- Is a person dropped off and picked up for work so that their movements are controlled



- Is a person withdrawn or frightened
- Is a person in a situation of dependence
- Has a person been physically or emotionally harmed or deprived of necessities such as food, sleep, medical care, etc.