



Modern Slavery Statement

Organisation Structure & Supply Chains

Plastipak UK Ltd, part of Plastipak Holdings Inc., operates within the manufacturing sector as a market leader in the production of PET (Polyethylene Terephthalate) preforms and bottles. The Company has 2 sites in the UK covering Factory and Corporate Office facilities. The products are mainly produced for the UK market, with some exported to the EU such as the Republic of Ireland.

We are committed to fully complying with the Modern Slavery Act 2015 in our operation in the manufacture and sale of PET preforms and bottles.

We have zero tolerance to any form of modern slavery and will not support or deal with any business knowingly involved in slavery or human trafficking. We are committed to acting ethically with integrity and transparency in all our business dealings to ensure against any form of slavery taking place within our business and supply chain.

Our approach to any form of modern slavery is embedded in our business core values covering:



Responsibilities

The Directors and the Senior UK Leadership Team shall take responsibility for ensuring this statement is reviewed and up to date.

The Senior UK Leadership Team will promptly and thoroughly investigate any claim or indication that there has been a violation of this statement, and take remedial action in the event of contravention and report back to the Directors.

The Human Resources function will be responsible for introducing and reviewing policies.

Our Policies and Standards

The Company operates a Social Compliance Policy which includes Modern Slavery and in addition, operates a Code of Conduct covering areas including, for example, Anti-Bribery and respecting Human Rights. In addition, employees can raise concerns and report misconduct including unethical behaviour by colleagues, customers, suppliers and third party's under the Code of Conduct.

We work closely with the Agency that provides our temporary staff who are a business partner of Stronger Together UK. The last year has seen a significant reduction in our numbers of agency staff.



Training and Awareness

We provide training for relevant staff and functions to ensure they understand slavery and human trafficking.

We publish on our Social Compliance noticeboard Stronger Together information and have a point of contact if issues need to be raised.

Due Diligence and Managing Risk

We are committed to implementing and enforcing effective processes to prevent the risk of slavery and human trafficking in our supply chains including:

- Compliance with the Plastipak Code of Conduct.
- Continuous review of Plastipak HR policies and standards in line current UK legislation.
- Undergoing periodic Ethical Trading Initiative (ETI) Base Code of Conduct audits by our customers. The requirements of the ETI Base Code are publicly displayed in our factory.
- Working closely with the Agency that provides our temporary staff who are a business partner of Stronger Together UK. They also have long standing relationships with the Recruitment and Employment Confederation, the Association of Labour Providers, the Association of Recruitment Consultants and they are a GLAA licence holder and work closely with the GLAA. In addition, they have due diligence processes for their workers, applicants and suppliers.
- Membership of the Supplier Ethical Data Exchange (SEDEX), a not for profit membership organisation dedicated to driving improvements in responsible ethical business practices in global supply chains.
- Periodic audits by our customers.
- Reference checking in recruitment.
- Approved Supplier lists.
- Understanding the ethical policy status of our suppliers.

Performance Measures

a) 2020

Complaints

We have received no complaints relating to modern slavery and human trafficking. However, we will continue to periodically review best practice as part of our continuous improvement culture.

Safeguarding

Our main focus in 2020 was safeguarding our employees and agency personnel in response to the CV19 pandemic. To ensure this objective was achieved and that no one felt vulnerable the following approach was adopted:



- Where possible, our colleagues worked from home with appropriate health and safety monitoring in place.
- Employees identified as vulnerable shielded in accordance with the public health advice.
- Factory based personnel and those unable to work from home have been subject to social distancing and mask wearing policies in addition to regular sanitising. Site facilities have been modified to reduce CV19 risks. This is continuing.
- During the pandemic all staff have been regularly briefed on Company and Government policy changes including regular communication from the Business Continuity Team (BCP).
- Regular consultation and discussion has taken place with our Partnership Council trade union representatives and our agency provider.

Induction – New Recruits

There was continued emphasis on our ETI Base Code for new recruits.

b) 2021

The focus for 2021 will be a combination of internal and external activities, with key areas as follows.

Safeguarding

We will continue to have a focus on safeguarding of employees, agency and visitors during 2021 in response to CV19. Phased return to site for those who have been working from home is planned, subject to legal requirements.

Increased Awareness

We will be increasing awareness of Modern Slavery in the business through:

- Reminder to all our employees of our commitment to the ETI Base Code and Modern Slavery.
- Inclusion of Modern Slavery as part of our Partnership Council Meeting agenda.
- Selection of 3 key suppliers to ensure Modern Slavery is a key focus for them.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes slavery and human trafficking statement for the financial year ending 31 October 2020 of Plastipak UK Ltd.

Signed by Pedro Martins

Pedro Martins

Executive Managing Director

Dated April 23rd 2021