

Slavery and Human Trafficking Statement of CANPACK S.A. and CAN-PACK UK Limited for the financial year 2020

This Slavery and Human Trafficking Statement was prepared in compliance with regulations imposed by The Modern Slavery Act 2015 enacted by the Parliament of United Kingdom, approved with the royal assent on 26 March 2015.

I. Introduction

During the past financial year CANPACK S.A. and CAN-PACK UK Limited have continuously monitored their organisational structures and supply chains in order to ensure that the highest standards and appropriate mechanisms are applied in order to identify and prevent any possible symptoms of slavery, servitude, forced or compulsory labour, child labour or human trafficking.

As before, CANPACK S.A. and CAN-PACK UK Limited, being members of the global CANPACK Group, approached the problem of modern slavery with great care, interest and continued commitment to create and maintain safe and employee-friendly environment, both within the Group itself and within the supply chains that are used by any of the Group's company.

Therefore, as in the previous financial years, herein is presented the Slavery and Human Trafficking Statement containing the overview of actions taken by CANPACK S.A. and CAN-PACK UK Limited to ensure that slavery and human trafficking was not taking place in any of companies' supply chains, nor in any part of the companies' business.

II. Business Structure and Supply Chain

Business Structure of CANPACK S.A. and CAN-PACK UK limited, as well as the supply chain used by both companies, have not varied during the past financial year compared to previous reported years.

CANPACK S.A. and CAN-PACK UK Limited are engaged in business activity regarding manufacturing and distributing packaging for food and beverage industries. The policies and activities of both companies taken in regard to the prevention and elimination of modern slavery and human trafficking are uniform and consistent among both companies, as well as the whole CANPACK Group.

Both CANPACK S.A. and CAN-PACK UK Limited have access to variety of raw materials suppliers around the globe, but in order to maintain the highest ethic and business standards in commercial relations, supply materials necessary for the conduction of companies' activity are sourced only from reputable and verified suppliers, who can guarantee observance of the CANPACK Group standards and policies, as well as binding regulations of European Union and international conventions.

III. Policies Regarding Slavery and Human Trafficking

In order to ensure the highest ethical and legal standards of their suppliers, both CANPACK S.A. and CAN-PACK UK Limited have implemented uniform policy of CANPACK Group Suppliers Code of Conduct. As in the previous years, this policy was strictly abided by, and best endeavours were used in order to make sure that any an all of the companies' suppliers adhered to its provisions.

CANPACK Group Suppliers Code of Conduct requires the suppliers to comply with all relevant applicable laws and regulations in countries of their operations, including any legislation concerning prevention of slavery, compulsory labour or human trafficking. Furthermore, every supplier is required to respect the rights and dignity of each individual involved in their business, including any employee or contractor of the suppliers. Any kinds of forced labour and employment of minors is strictly unacceptable. Each supplier is obliged to respect the UN Universal Declaration of Human Rights and the Eight Fundamental Conventions of the International Labour Organisation. In particular, each and every supplier must ensure that in their respective supply chain: (1) the minimum employment age limit defined by national law, applicable regulation and the relevant fundamental Convention of the International Labour Organisation is adhered by; (2) forced, slave or unpaid labour is prohibited; (3) wages and working hours meet or exceed the national legal standards; (4) discrimination and harassment of any kind is not tolerated; (5) the freedom of association is observed.

Moreover, in order to secure and maintain the best standards within the CANPACK Group itself, both CANPACK S.A. and CAN-PACK UK Limited have implemented the CANPACK Group Code of Conduct.

CANPACK Group Code of Conduct sets the highest level of professionalism and ethical behaviour in relation to both labour law and human rights. This Code requires any CANPACK Group company to ensure that any of the company's activities fulfil the rights and needs of its employees, and are in compliance with laws governing labour relations, working hours, working conditions and remuneration. Each and every CANPACK Group company, including CANPACK S.A. and CAN-PACK UK Limited, must not use and cannot accept the use of forced labour, slave labour, unpaid labour, or human trafficking at any point along the supply chain. It is obligatory to avoid any cooperation with suppliers that are known for making use of forced labour in their operations.

In addition, the Code addresses the issue of freedom of assembly, whereas the management of every CANPACK Group company is required to strive for transparency and consultation with employees in issues which concern them. Each and every employee have the right to represent their own interests with regards to employers to the full extent guaranteed by law, including the ability to form or join trade unions. The executive management is furthermore required to strive for transparency and to provide information to employees about the activities of the CANPACK Group.

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The full text of the CANPACK Group Code of Conduct can be found under following address: https://www.canpack.com/wp-content/uploads/2020/10/CANPACK-Group_Code-of-Conduct.pdf

IV. Due Diligence Processes

Observance of the applicable codes and policies is constantly verified by the procurement departments of both companies, which ensure that each of the suppliers accepts and signs the Suppliers Code of Conduct, and which are obliged to take prompt and adequate steps whenever any infringement of the rules contained in the Suppliers Code of Conduct is discovered.

As to the internal affairs of the companies, the organizational structures and informational flow of both companies allows any of the companies' employee to easily report any concerns in anonymous and fearless manner, either to any of the companies' managers or persons designated for ethical or labour issues. Compliance with the aforementioned codes and policies within the CANPACK Group is subject of verification of internal and external audits.

V. Risks

As in the previously reported years, CANPACK S.A. and CAN-PACK UK Limited maintain cooperation with reputable and well-verified suppliers, where the risk of any abuse or infringement of the good standards is rather minimal, but nevertheless taken into consideration and carefully evaluated at each time. As of today neither CANPACK S.A. nor CAN-PACK UK Limited have identified any considerable risk related to occurrence of slavery, servitude, forced or compulsory labour, child labour or human trafficking within their organizations or within their supply chains.

VI. Effectiveness and Further Training and Improvement

As of today no slavery, servitude, forced or compulsory labour, child labour or human trafficking has been discovered within the CANPACK S.A. or CAN-PACK UK Limited structures, or within any of the companies' chain of supply. Nevertheless, both CANPACK S.A. and CAN-PACK UK Limited will strive to maintain the highest applicable ethical, legal and business standards in their commercial and social activity, and will aim to educate and train its personnel in the area of prevention of modern slavery and human trafficking.

This Statement was approved and signed on 12nd March 2021 by:

Małgorzata Podrecka
Vice-President of the
Management Board
CANPACK S.A.

Marius Croitoru
Vice-President of the
Management Board
CANPACK S.A.