



## UK MODERN SLAVERY ACT STATEMENT

### Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Waddington Europe has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Waddington Europe is a leading global consumer goods company. Waddington Europe rigorously applies high standards of corporate governance and ethics to its business and emphasizes transparency and accountability. Modern slavery encompasses slavery, servitude, human trafficking and forced labor. Waddington Europe is 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.

### Organizational structure and supply chains

Waddington Europe and its subsidiaries is a member of The Waddington Group (TWG) is a major global packaging manufacturer and marketer with four divisions:

**United States:** WNA offers a broad range of mainly upscale disposable solutions for the foodservice industry including catering, bakery, processor, deli and chain restaurants. Product innovation has been the key to the success of WNA over many years and they have an enviable reputation for being first to market with many new technologies. WNA has several manufacturing facilities strategically located throughout the U.S. utilizing various technologies including injection molding, thermoforming, metallizing and decorating.

**Canada:** With manufacturing facilities in Montreal and in Toronto POLAR PAK (formerly Polar Plastic and Par-Pak) has many of the same manufacturing capabilities offered by WNA in the US and serves the foodservice, bakery, deli, produce and confectionary markets. In addition to products manufactured in Canada, POLAR PAK also markets products produced by other Group companies, thereby providing unparalleled one-stop shopping convenience for single-use foodservice products across Canada.

**Europe:** Waddington Europe is a leading bespoke thermoformer of packaging and transit trays for a wide range of markets including bakery, dairy, protein, food service, produce and non-food. This division represents the TWG companies in Europe, namely: ParPak Europe, Holfeld Plastics, Deltaform, Chiltern Thermoforming and Eureka Caterware.

**Global Green Solutions:** Eco-Products, of Boulder, Colorado, is the leading brand and thought innovator in the green packaging space. Eco-Products offers a broad array of green packaging solutions and truly lives by its mantra, "Green is all we do.<sup>TM</sup>"

The corporate offices of The Waddington Group are located in Covington, Kentucky (close to Cincinnati, Ohio).

## **Relevant policies**

Waddington Europe operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Code of Conduct
- Equal Opportunities Policy
- Anti-bribery policy
- Harassment Policy

Waddington Europe's policies is the key to our continued growth and a commitment by every employee to an ethical workplace. Our policies help us keep that commitment by reflecting our values, putting our Company policies into practice and providing us with the information we need to make good decisions. Waddington Europe's policies makes clear to employees the actions and behavior expected of them when representing Waddington Europe. Waddington Europe strives to maintain the highest standards of employee conduct and ethical behavior when operating abroad and managing its supply chain.

Waddington Europe uses only specified, reputable employment agencies to source labor and verifies the practices of any new agency before accepting workers from that agency.

Waddington Europe is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labor. Waddington Europe works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Each supplier is required to conduct themselves in the required manner, failure to do so will lead to the termination of the business relationship.

Waddington Europe encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, Waddington Europe. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Waddington Europe's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact our HR team anonymously if they wish to.

## **Risk assessment and due diligence**

The greatest potential risk of slavery and human trafficking can exist in our supply chain. Waddington Europe believes that the risk of slavery and human trafficking is mitigated as a result of clearly established standards, oversight and quality controls within our sourcing process and business operations.

Waddington Europe undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. Waddington Europe's due diligence and reviews include:

- reviewing on a regular basis all aspects of the supply chain
- conducting supplier audits or assessments through Waddington Europe's auditors.

### **Performance indicators**

Waddington Europe reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015

### **Training**

Waddington Europe requires key professionals within Waddington Europe to complete training on modern slavery on a periodic basis.

Waddington Europe's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labor engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within Waddington Europe;
- what steps Waddington Europe should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from Waddington Europe's supply chains.