

Modern Slavery Policy Statement

Introduction from the Managing Director

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. InterFlex Group UK has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and relationships to ensure that modern slavery is not taking place within our own business or in any of our supply chain.

This statement is made in accordance to s.54 of the Modern Slavery Act 2015 and outlines what is in place in order to help combat modern slavery and reflects practices during financial year ending 31 December 2018 and improvements for the present year.

Our Business

We are recognised experts in flexible packaging manufacturing. Market leading quality, speed of response, innovative technical development and exceptional customer service, are the key pillars upon which our business has grown over the last 40 years. We have two UK manufacturing sites; Sunderland and Dalkeith, employing 244 employees, with a further two manufacturing sites and technical facility in North America.

Our Supply Chain

Our supply chain includes the sourcing of raw materials related to the manufacturing of packaging such as film and inks. We operate a supplier policy and maintain a preferred supplier list, which holds circa 300 suppliers for the entire business.

InterFlex Group embraces its responsibility, as part of our corporate governance, to minimise any risk of Modern Slavery within our global supply chain and is committed to act ethically and with integrity in all our business relationships.

As part of this commitment we formally share our policy statement with all our key suppliers to clearly demonstrate our expectations of them. Any supplier found to be involved in Modern Slavery would have all contracts terminated with immediate effect.

Our Policies and Procedures

InterFlex has a number of policies and procedures predominantly led by Human Resources which demonstrate our commitment to ensuring our relationships, both internal and external, are of the highest integrity.

- ✓ Real Living Wage Accredited; we are committed to providing both employees and regular third party contractors the real living wage. The real living wage is part of the supplier contract or service agreement set up prior to supply.
- ✓ Bullying and Harassment and Grievance; our policies outline our desire to promote an environment where everyone is to be treated fairly, with respect and dignity; outlining processes to deal with complaints seriously, promptly and confidentially.

- ✓ Corporate Social Responsibility; as a responsible corporate citizen, we aim to act in a socially responsible manner at all times. This policy covers a number of different areas in relation to our conduct including forced labour and child labour and juvenile workers. Employment with the InterFlex Group shall be freely chosen by the worker and employees are free to terminate their contract and leave.
- ✓ Equal Opportunities; InterFlex is committed to the promotion of equal opportunities and ensuring that the human resources, talent and skills of all people are maximised. It is our policy is to treat all InterFlex employees with respect and dignity, and to ensure that decisions are taken without reference to irrelevant or discriminatory criteria. We will take every possible step to ensure that decisions on recruitment, selection, training, conditions of work, pay and benefits, promotion, career, management and every other aspect of employment are justifiable and based solely on objective criteria.
- ✓ Recruitment; InterFlex will not employ any persons below the UK minimum working age of 16 years. Juvenile workers, under 18 years, will not be permitted to work overtime, nightshift or perform hazardous tasks. Proof of age will be checked during recruitment and copies retained on file. We will only use reputable recruitment agencies and contract organisations for work carried out on our premises.

Due Diligence

- ✓ Right to Work Checks; we complete the relevant right to work checks for all employees. InterFlex will not employ any persons below the UK minimum working age of 16 years. Proof of age/Right to work documents will be checked during recruitment and copies retained on file. The right to work checks are part of any supplier contract or service agreement set up prior to supply.
- ✓ Supplier Assurance Questionnaire; exists for new suppliers acting as part of the vendor management process. We specifically request a copy of a supplier's Ethical Trading Policy prior to trading.
- ✓ Third Party Supplier Audits; have recently been introduced at InterFlex in relation to regular third party contractors. This ensures the specified contractor is upholding their contractual obligations.

Key Performance Indicators

InterFlex is a member of Sedex, with this comes the Sedex Members Ethical Trade Audit (SMETA) which is based upon the 4 Pillars of the Ethical Trading Initiative (ETI) Base Code. This biennial 2.5 day audit ensures that InterFlex follows and stays ahead of all best practice relating to the ethical treatment of employees and contractors.

As the base code evolves so do the requirements of the SMETA, which helps develop InterFlex's strategy towards policies and procedures for its people.

InterFlex also welcome a relationship with the Health and Safety Executive (HSE), partnering to ensure the safe treatment and environment for all workers.

Improvements

During the course of this year InterFlex pledges to improve its commitment by improving in the following areas:

- Introducing a new Whistleblowing procedure for all employees, contractors and visitors to site. Encouraging any concerns, any individual may have, to be raised in this way and subsequently addressed in the appropriate manner.
- Further on the job training will take place amongst the quality and purchasing departments who have the greatest influence on InterFlex's chosen supply chain, alongside the improvements to processes within their control.
- Greater promotion of InterFlex policies and procedures amongst third party contractors to ensure all workers are clear on their rights to evoke such policies regarding their relationships with and treatment at InterFlex, such as Bully and Harassment, Grievance etc
- A review of the current Supplier Assurance Questionnaire to provide an increased focus on Ethics and Modern Slavery.

Commitment

We will treat any breach of our Modern Slavery Policy very seriously. For example, any employee who breaches the policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct.

We are dedicated to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy Statement reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking does not take place anywhere in our business or within our supply chains.

We have a continued commitment against Modern Slavery and will continue developing our internal practices and working in partnership with our suppliers to maintain our zero tolerance stance.

Graham Tilley, UK Managing Director



4 May 2019

