

Slavery and Human Trafficking Statement of CAN-PACK S.A. and CAN-PACK UK Limited

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

CAN-PACK S.A. and CAN-PACK UK Limited, as members of the CAN-PACK Group, being one of the leading and most appreciated businesses in the industry, approach the problem of modern slavery with great care and interest. It is in the very centre of the Group's concern to prevent and work against any symptoms of slavery, servitude, forced or compulsory labour, child labour or human trafficking.

CAN-PACK Group is committed to the highest endeavour to meet the best standards in creating 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.

The Group place great emphasis to ensure that none of the aforementioned crimes and offences occur in its environment.

Therefore, with great appreciation and recognition of the United Kingdom's Government activity in this vital matter, herein is presented the Slavery and Human Trafficking Statement covering steps that have been taken by the CAN-PACK S.A. and CAN-PACK UK Limited in the previous financial year 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

CAN-PACK S.A. and CAN-PACK UK Limited are engaged in business activity regarding manufacturing and distributing packaging for food and beverage industries. As CAN-PACK UK Limited is a subsidiary company of CAN-PACK S.A., 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 CAN-PACK Group.

Both CAN-PACK S.A. and CAN-PACK UK Limited, as part of the global group, 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 CAN-PACK 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 the supplier, both CAN-PACK S.A. and CAN-PACK UK Limited have implemented uniform policy of CAN-PACK Group Suppliers Code of Conduct.

According to this policy, each supplier of CAN-PACK S.A. and CAN-PACK UK Limited is obliged to sign the policy and assure that the rules and regulations contained thereof will be abided in the course of supplier's operation.

CAN-PACK 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 CAN-PACK Group itself, both CAN-PACK S.A. and CAN-PACK UK Limited have implemented the CAN-PACK Group Code of Conduct.

CAN-PACK 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 CAN-PACK 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 CAN-PACK Group company, including CAN-PACK 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. The employees of the companies' may at any time terminate their employment contracts, and

retain the use of their own identification documents. It is obligatory to avoid any cooperation with suppliers that are known for making use of forced labour in their operations.

Consequently, the Code prohibits employment of any person who has not reached the legal age for employment for the country where they are living. It is forbidden to employ any person who is not at least fifteen years old, and for any employees below the age of 18, it must be ensured that the type of work or number of hours worked does not interfere with their ability to receive an education.

In addition, the Code addresses the issue of freedom of assembly, whereas the management of every CAN-PACK 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 CAN-PACK Group.

The full text of the CAN-PACK Group Code of Conduct can be found under following address:

http://www.canpack.eu/wp-content/uploads/2017/01/kodeks1_nowy_ENG_16112016.pdf

IV. Due Diligence Processes

In relation to the CAN-PACK S.A. and CAN-PACK UK Limited suppliers, the observance of the described codes and policies is constantly verified by the procurement team, who ensures that each of the suppliers accepts and signs the Suppliers Code of Conduct, and who is 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 CAN-PACK Group is subject of verification of internal and external audits.

V. Risks

As the supply chains of CAN-PACK S.A. and CAN-PACK UK Limited are relatively short (the raw materials are usually obtained directly from the producers) the verification of the obedience of all relevant codes and policies is more effective compared to complicated and complex chains of supply, which occurs in other industries. Since CAN-PACK S.A. and CAN-PACK UK Limited cooperate with reputable and well-verified suppliers, 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.

VI. Effectiveness and Further Training and Improvement

As of the date of this statement, no slavery, servitude, forced or compulsory labour, child labour or human trafficking has been discovered within the CAN-PACK S.A. or CAN-PACK UK Limited structures, or within any of the companies' chain of supply. Nevertheless, both CAN-PACK 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 covers the period of financial years 2016 and 2017.

This Statement was approved and signed by:

Herman Nicolaas Nusmeier, President of the Management Board
on behalf of CAN-PACK S.A.

Philip Fisher, Director
on behalf of CAN-PACK UK Limited

Gary Beard, Director
on behalf of CAN-PACK UK Limited