



# Modern Slavery and Human Trafficking Statement

**This statement has been published in accordance with Section 54 of The Modern Slavery Act 2015 and constitutes the anti-slavery and human trafficking statement for Berlin Packaging Holding UK Ltd and its subsidiary, Berlin Packaging UK Ltd (collectively, “Berlin Packaging UK” or the “Company”) for the fiscal year ending 31 December 2024.**

## **Introduction**

Berlin Packaging UK recognises its responsibility and is committed to taking a robust approach to preventing slavery, child labour, servitude, forced labour and human trafficking (Modern Slavery).

This statement sets out the Company’s actions to understand all potential risks related to our business and to put in place steps that are aimed at ensuring that there is no manner of Modern Slavery in our business, whether directly or within our supply chains.

Modern Slavery is a global issue and a violation of fundamental human rights. No industry is immune to the issue, and we are committed to being alert to the risks and implementing strategies to prevent and manage those risks throughout the supply chain.

## **Company structure and supply chains**

Berlin Packaging UK specialises in supplying a range of glass, metal and plastic containers and closures for customers in various end markets, along with packaging solution services including design and technical and logistical support.

Our products are sourced from a global supply chain and, while business relationships with our supply base are long-term and well-established, we recognise that this introduces a risk of breaches to human rights that are not within the control of the Company and that we must therefore take steps to identify and minimise this risk. The Company also accepts that we cannot do this alone and relies on the transparency and cooperation of suppliers to identify breaches of the Modern Slavery Act 2015 within their own supply bases. We will only do business with suppliers, contractors and consultants that comply with relevant laws, rules and regulations and the standards of business conduct set forth in Berlin Packaging’s Supplier Code of Conduct, including standards on human rights and labour.

The CEO and Company Directors have overall responsibility for the Company’s anti-slavery initiatives and for ensuring that all those under Company control comply with it.

This statement covers the following activities of the Company:

- Procurement
- Logistics, Packaging and Distribution
- Labour
- Contracted services
- Technical and Laboratory Services



## **Relevant Policies and Working Practices**

The Company operates the following policies that describe its approach to the identification of Modern Slavery risks and steps to be taken to prevent Modern Slavery in its operations:

- **Whistleblowing Policy** - The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or supply chains, of the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking and taking into account UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the principles concerning fundamental rights set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation and provides the opportunity to report anonymously through a third party managed portal, the Compliance Helpline. The Company's full Whistleblowing Policy and links to the reporting channels are available on the Company's website: <https://berlinpackaging.eu/en-international/compliance>
- **Employee Code of Conduct** - The Company's Global Code of Conduct clarifies to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating both domestically and abroad to manage its supply chain. This responsibility includes listening to employee concerns, maintaining confidentiality, and taking appropriate action in responding to such concerns. Employees are expected to sign a copy of the Code of Conduct every year.
- **Supplier Code of Conduct** - The Company 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, treat workers with dignity and respect, and act ethically and within the law in their use of labour including, without limitation, those related to human rights, health and safety, work relationships, anti-bribery, corruption, conflicts of interest, antitrust, trade, the environment, and data privacy. We work with suppliers to ensure that they meet the required standards and improve their own and their supply chains' working conditions. Any violations recognised within our supply chain through our whistleblowing policy or supplier audits and assessments shall be acted upon immediately with improvement measures and follow-up activities. Berlin Packaging UK may also terminate its business relationship with the supplier if it determines that a supplier or any of its subcontractors has violated the Company's Supplier Code of Conduct or if the supplier has continued violations without improvement.
- **General Recruitment** – We ensure that all our staff are legally able to work in the UK and provide information to all new recruits on their statutory rights, including sick pay, holiday pay and any other benefits they may be entitled to.
- **Agency Workers Policy** - The Company uses only specified, reputable employment agencies to source labour.

## **Risk Management**

Berlin Packaging UK sources from a global supply base with varying degrees of risk associated with the differing countries. Where we consider the countries to be of a higher risk, we manage risk appropriately to approve suppliers on a case-by-case basis, after conducting due diligence specified



below.

With its Sedex (Supplier Ethical Data Exchange) membership, the Company is strengthening its relationship and transparency with both suppliers and customers. This approach aims to identify and understand the areas of highest human rights risks within its tier 1 and tier 2 suppliers. Through the Sedex platform, the Company connects directly with its suppliers, gaining visibility over their assigned risk score, which is determined based on their responses to a self-assessment questionnaire and, where applicable, on-site audits. When a supplier is identified as high risk, the Company proactively contacts them to carry out a follow-up process and monitor any identified non-conformities.

In general, Berlin Packaging UK maintains close business relationships with its suppliers, including regular visits to review performance and development activities.

The company is seeking to standardise the due diligence approach across the global business.

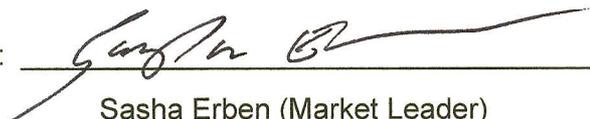
### **Due diligence**

The Company undertakes due diligence when considering taking on new suppliers, and reviews its existing suppliers on a quarterly basis, as established by the Standard Operating Procedure (SOP) developed to review high risk suppliers.

The Company's due diligence and reviews include:

- conducting supplier audits or assessments, both independently and through Sedex;
- ensuring suppliers have acknowledged the Supplier's Code of Conduct;
- conducting regular risk profiles for each supplier;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our Supplier Code of Conduct, including the termination of the business relationship;
- ensuring that all employees are made aware of the Global code of Conduct and their obligation to comply with this policy;
- ensuring that staff involved in supplier audits, procurement, recruitment and deployment of workers are appropriately trained and aware of the risks of modern slavery and ethical business practices; and
- understanding that the risks of Modern Slavery are growing, and we will continue to monitor our approach to mitigating this risk in the year ahead.

This statement has been approved by the CEO and CFO (together forming the board of the Company), who will review and update it annually.

Signed:   
Sasha Erben (Market Leader)

Date: June 2025'  
Review Date May 2026