

Modern slavery and human trafficking statement

Introduction

This statement sets out the Alexir Partnership's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

The company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The company is absolutely 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.

Organisational structure and supply chains

This statement covers the activities of the Alexir Partnership:

- The design, printing and finishing of carton board packaging, and the packing of dry foods i.e., seasoning, noodles, meal kits and airline products.

Countries of operation and supply

The company currently operates in the following countries:

- United Kingdom

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- A supplier management programme is in place and includes the evaluation of suppliers and subcontractors through questionnaires, audits as necessary and ethical information.

High-risk activities

The Alexir Partnership have not determined any supply chain or contractor as high risk of slavery or human trafficking:

Responsibility for the company's anti-slavery initiatives is as follows:

- **Policies:** The HR manager, supported by the senior leadership team, is responsible for ensuring that all policies around Human rights and modern slavery are kept relevant and up to date.
- **Risk assessments:** The HR manager, supported by the senior leadership team, is responsible for ensuring that all risk assessments are in place
- **Investigations/due diligence:** The HR manager, supported by the senior leadership team, is responsible for ensuring that due diligence and investigations are carried out within the confines of the law
- **Training:** All staff are made aware of their rights through the induction process and through the staff handbook. This is managed by the HR manager for all HR related topics, and the Partnership QA and H&S manager for the induction process and further training as required.

Relevant policies

The company 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:

- **Whistleblowing policy** The company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company'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 call the numbers provided on the whistleblower policy if the need arises.
- **Employee code of conduct** The company's code makes clear 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 abroad and managing its supply chain.
- **Procurement 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 where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the company's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy** The company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The company's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- evaluating the modern slavery and human trafficking risks of each new supplier
- conducting supplier audits or assessments through the supplier management programme
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through auditing as necessary and requiring them to implement action plans as appropriate
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking, in particular, Sedex
- using Sedex where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- 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

Performance indicators

The company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the company is:

- requiring all staff working in the Alexir Partnership to have completed training on modern slavery at their induction training
- developing a system for supply chain verification, in place since 2016, whereby the company evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains annually, or every 3 years, dependent on risk allocation

Training

The company requires all staff working in the Alexir Partnership to complete training on modern slavery as part of induction and refresher training

The company'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 labour 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 the company.

- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative.
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the company's supply chains.

Awareness-raising programme

As well as training staff, the company has raised awareness of modern slavery issues by putting up posters across the company's premises.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015.
- how employers can identify and prevent slavery and human trafficking.
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the company

Director/senior management approval

This statement has been approved by the company's board of directors who will review and update it annually, as managed by the HR manager

Director's signature:

A handwritten signature in black ink, appearing to read 'Robert N Davison'.

Director's name:

Robert N Davison

A handwritten signature in black ink, appearing to read 'Jeremy Keable'.

Jeremy Keable

Date:

13/12/2024