

MODERN SLAVERY STATEMENT 2021



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This statement sets out SAICA's actions in the UK to understand our potential modern slavery risks and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business and supply chains. This statement relates to actions and activities during the financial year 1 January 2021 to 31 December 2021.

ORGANISATIONS STRUCTURE AND SUPPLY CHAIN

Saica is split into four divisions, working in an integrated cycle to produce sustainable solutions for recycling and waste services, paper, board and flexible packaging. The divisions comprise SAICA Natur, SAICA Paper, SAICA Pack and SAICA Flex.

Our Paper and Pack businesses operate almost entirely within the UK & Ireland only. Natur operates predominantly in the UK and Ireland, with some limited sales internationally. Flex operates predominantly in the UK with a proportion of sales and supply internationally.

Consequently, our suppliers are predominantly from within the UK & Ireland with lower risks, although some specialist material supplies are sourced internationally.

OUR COMMITMENT

We recognise that we have a corporate social and ethical responsibility to take a robust approach to tackling modern slavery.

One of the fundamental principles firmly upheld by our company, which infuses and governs the professional actions of our managers and executives, is legal and ethical behaviour devoted to guarantee sustainable growth. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its employees and supply chains are all free from slavery, human trafficking, debt bondage or any other form of slavery.

As part of this Saica has been committed to the Ethical Trading Initiative (ETI) Base Code (www.ethicaltrade.org) and has maintained and followed an Ethical Trading Statement and Policy. The Statement and Policy, as well as the ETI Base Code, are contained in the Saica Colleague Handbook of the UK and Ireland. The Policy shows that the inclusion of steps to combat slavery and human trafficking in Saica's values and policy pre-date the Modern Slavery Act.

DUE DILIGENCE PROCESS FOR ASSESSING RISK

Internal employees

- The 'Right to Work' checklist issued by the Government is used to verify all new employees and requesting updated copies of relevant documents if required.
- During the recruitment offer process, we ensure potential employees are aware that relevant documentation will need to be presented.
- The vast majority of workers are employed directly by SAICA where we have direct control over processes, and hence we use very low proportions of agency employees. Even in the case of agency employees as we are subject to external SMETA audits in many plants we have a process for validating the Agency procedures.
- Training has been provided for HR and Procurement on the Act to raise awareness on Modern Slavery, how to identify and deal with it efficiently.
- Compliance with the Modern Slavery Act has been included in our Ethical Trading policy within the Employee handbook.
- Our Code of Ethics and Legal Compliance has been communicated and trained to all UK & Ireland employees, as well as taking a place of prominence on our website from which it can be accessed by all customers and suppliers.

Supply chains

- Saica template contracts ensure suppliers are expected to abide by the SAICA Code of Ethics which includes anti-slavery. This covers both new and renewal contracts. In key cases this has also extended into supplier questionnaire which include ethical trading requirements and supplier audits usually to ISO standards.
- A basic risk assessment of suppliers in Pack was carried out, based upon systematic criteria to identify larger higher risk supplies. In these cases a more in-depth assurance approach has been taken.

Through the processes discussed in this section, Saica will continue to deploy these steps in order to verify all suppliers and employees over time. Additional methods to enhance awareness and compliance will be reinforced through audits and training.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Saica's slavery and human trafficking statement for the financial year ending December 2020.



Director – Saica Pack UK Ltd, Saica Paper UK Ltd, Saica Natur UK Ltd, Saica Flex UK Ltd

