

# Valpak's 2016 Modern Slavery & Human Trafficking Statement

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25 May 2017

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## 1 Valpak Limited - Our Commitment

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Valpak welcomes the UK Modern Slavery Act 2015 and the Transparency in Supply Chains provision as a means of tackling the global issue of modern slavery.

Valpak is committed to maintaining high standards throughout our dealings with employees, customers and suppliers, conducting every aspect of our business with honesty, integrity and openness. Valpak will continue to review our practices to meet these standards.

Key elements that we seek to address:

### **Policy**

We have defined clear standards for our staff and our suppliers in our Code of Ethics and expect these to be adhered to. The policy will be communicated to all staff and suppliers to encourage them to act responsibly and affect change.

### **Risk management**

We have identified that our greatest potential risks in relation to modern slavery exist in our in our supply chain. A risk management approach has been taken to help us identify and understand the potential risks and to ensure we can respond appropriately to any challenges. We will continue to review this approach and seek to strengthen our processes.

### **Awareness**

At Valpak, we recognise our responsibility to ensure staff are aware of the reality of modern slavery in the UK and worldwide. We provide training that enables staff to recognise and respond to any instances of modern slavery - during work time or otherwise.

This Statement details the steps taken by Valpak Limited and its subsidiaries within the financial year ending 31 December 2016 to ensure that modern slavery is not occurring in our business and supply chain. It has been approved by the Executive Board on 25 May 2017.

The Valpak Slavery and Human Trafficking statement will be updated and published annually.

### **Signature**



**Name: Steve Gough**

**Position: CEO**

**Date: 25 May 2017**

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## 2 Our Organisation

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Valpak has been providing complete, innovative environmental solutions to over 4,000 customers since 1997 when the first piece of producer responsibility legislation, the Packaging Waste Regulations, was introduced in the UK.

We have continued to grow our service offering steadily, providing solutions for organisations obligated under a wide range of complex environmental legislation, encompassing sustainability and waste management issues amongst many others.

The compliance and consultancy services are delivered from two offices: one based in Stratford upon Avon and the second in Glasgow. Altogether, Valpak has approximately 120 personnel.

### 2.1 Our supply chain

Our supply chain includes a wide range of organisations, providing Valpak with services and goods which support our office operations, compliance activity and waste management and recycling services undertaken on behalf of our members. The majority of direct suppliers to Valpak are medium to large UK based organisations, whilst international end-markets are utilised for recyclable materials.

These suppliers include general office suppliers, East European and UK based recyclers and reprocessors, site contractors, sub-contractors and haulers amongst others.

#### 2.1.1 Supplier process

Valpak has long standing relationships with many of its suppliers and if we have any concerns that they are not meeting our expected standards, we work with them to address this.

Valpak's supplier set up process is comprehensive; tailored to the type of supplier, we request information from the company on its health and safety, environmental, quality and security systems to ensure maximum visibility.

For organisations which provide international and UK recycling and reprocessing services, Valpak carries out site audits which review health and safety, environmental and quality practices and policies. This audit process has been expanded to include consideration of ethical factors which could highlight the potential for the risk of modern slavery. If issues are identified, these will be investigated and we will work with the supplier to address any concerns.

Valpak has a Code of Ethics for suppliers which all suppliers are expected to adhere to, or to take steps to become compliant.

### 2.2 Our Operations

Valpak conducts its business by developing long standing, reliable, dependable, safe, innovative, customer focused and sustainable services. Valpak has a Corporate Social Responsibility Policy, and an Ethical Policy for staff which sets out our commitments and standard of conduct to our employees and members.

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The Corporate Social Responsibility Policy provides a framework of standards and principles for Valpak managers and employees to adhere to in regard to the following areas:

- Business Ethics
- Health & Safety
- Employment
- Customer
- Community
- Environment

The Ethical Policy includes commitments to:

- Fair and equal pay which is monitored through our Remuneration Committee of the Board
- Equal opportunities
- Human rights

Responsibility for the policies and the action to address modern slavery within our business and supply chain is held by the Director of HR and the Chief Executive Officer, who provide the operational and leadership commitment.

Valpak encourages its customers, suppliers and employees to use the Whistle Blowing policy to report any concerns, including issues regarding Modern Slavery. Any complaint received will be investigated thoroughly. In addition to Whistle Blowing, Valpak has grievance procedures in place for employees and complaints procedures for customers and suppliers.

Our recruitment practices respect human rights at all times by ensuring equal opportunities and fair treatment for all. New employees are screened in compliance with right to work checks and we only work with reputable recruitment consultants with whom we have preferred supplier relationships with. All employees have agreed terms and conditions which accord with employment law and we have an internal commitment to pay our employees above national living wage regardless of age. We have a zero tolerance approach to slavery, trafficking or forced labour.

## 3 Our Actions

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During the financial year, Valpak reviewed its practices and corporate policies on business ethics and corporate social responsibility against the requirements of the Modern Slavery Act. As a result, Valpak has taken steps to strengthen our commitment to reduce the risk of modern slavery and human trafficking within our business and our supply chain.

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## 3.1 Corporate Policy

Valpak is committed to conducting business with honesty, integrity and openness, respecting human rights and the interests of our employees. As part of our internal review process, our corporate policies were reviewed to ensure that they supported the ambitions of the Modern Slavery Act. As such the following policies were updated to include reference to slavery and human trafficking:

- Ethical Policy – for all staff
- Code of Ethics Policy – for suppliers
- Corporate Social Responsibility (CSR) Policy

## 3.2 Communication and Training

Valpak believe that as part of our commitment to help prevent modern slavery and human trafficking, it is important to raise our employee and supplier awareness of the issue.

### 3.2.1 Internal Communication

To help raise awareness:

- A Working Group with representatives from the different departments and service areas was established. This Group is responsible for raising awareness, reviewing current practices and identifying areas for improvement.
- Internal briefings have been provided to raise awareness and outline:
  - An explanation of what modern slavery and human trafficking is
  - The requirements and implications of the Modern Slavery Act
  - Practical information for customer facing staff who conduct site visits and who may come into contact with personnel at supplier/member sites, on how to respond if they are concerned about conditions they witness on a site
- All staff have received training on modern slavery which includes: the statistical information and a video describing the issue of modern slavery in the UK, the actions that Valpak is taking, signs to look out for and what to do if they are concerned about practices they may witness.

### 3.2.2 Communication with suppliers

The following steps have been taken to raise awareness to our suppliers:

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- The Code of Ethics – for suppliers – this document has been updated to include provisions on modern slavery and human trafficking. All suppliers have been asked to sign the Code and to promote the same high standards in their supply chains.
- Engagement with our members – Valpak has delivered briefings on the legislation for members

## 3.3 Supply Chain Risk Assessment

Valpak has a significant number of suppliers, circa 360 in 2016, providing a wide range of services and goods. Valpak has developed a risk assessment approach to identify risks of modern slavery within our supply chain. This will help us to focus our action and improve our understanding of these issues.

An initial exercise was carried out to allocate a low, medium, high risk rating to each category of supplier. In order to complete this assessment, Valpak engaged with relevant staff to optimise the existing knowledge and information held on the organisations within each supplier category at that time.

The second stage was to complete a more detailed risk assessment on the individual suppliers and this approach took into account a number of factors including:

- The financial value of the goods and services provided
- The level of influence and nature of our working relationship with the supplier
- The perceived level of risk of modern slavery within that business based on factors such as:
  - the location of the company for example UK based or known to be located outside of Europe
  - the industry sector and nature of the business for example office based professional services compared to manufacturing or manual labour industries and
  - the potential for high risk employment categories for example contract staff or migrant workers.

As a result of the risk assessment, the following steps were taken:

- All current suppliers were sent the updated Code of Ethics for suppliers and were required to acknowledge the commitments within the Code by signing the document and returning it to Valpak
- For all suppliers, the set up process has been amended to include questions on the approach taken to address modern slavery risks in their supply chains. This is an ongoing process and Valpak will work with suppliers if it appears or becomes apparent that there is a potential risk.
- Suppliers rated as 'high risk' through the risk assessment process are being asked to complete a self-assessment slavery and human trafficking questionnaire using our online questionnaire and data portal system.
- The questionnaire is based upon the Code of Ethics for suppliers, the Ethical Trading Initiative Base Code and the Stronger Together Ethical Trade and Human Rights self-assessment questionnaire. A risk rating has been applied to each question and the questionnaire requires suppliers to provide evidence to

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support their answers. This element of the risk assessment is ongoing and a continuous process. The responses are reviewed and appropriate corrective actions developed if required.