

Valpak's 2018 Modern Slavery & Human Trafficking Statement



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1 Valpak Limited - Our Commitment

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 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.

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

The Statement has been approved by the Executive Board.

Signature



Name: Steve Gough

Position: CEO

Date: 10th May 2019

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2 2018 Summary

This is the second annual statement on slavery and human trafficking. The statement details the steps taken by Valpak Limited (including Valpak Scotland Limited, Valpak Recycling Limited and Valpak Retail WEEE Services Limited) within the financial year ending 31 December 2018 to ensure that modern slavery is not occurring in our business and supply chain.

Since our previous statement, our core activities remain the same and the key activity undertaken during the financial year has been to embed our existing process through the following objectives and actions:

Objective	Actions	2018 Update
1. Staff are confident in approaching suppliers about their policies and practices in relation to modern slavery	<ul style="list-style-type: none"> Provision of awareness training within the induction process Provision of job specific training (where applicable) 	<ul style="list-style-type: none"> 100% of staff received the annual Modern Slavery Act & Valpak training An article on modern slavery has been included within each employee newsletter
2. Suppliers are aware of and share our commitment to tackling modern slavery	<ul style="list-style-type: none"> Supplier set up process to include modern slavery questions Monitor and review responses through the supplier set up process All suppliers to be sent the Code of Ethics, incorporated within supplier set up process 	<ul style="list-style-type: none"> New suppliers are all required to respond to the modern slavery questions. 88% of new suppliers within 2018 signed and returned the Code of Ethics. Of the new suppliers 25% had existing modern slavery statements.
3. Valpak has confidence that our suppliers apply good human rights and labour practices	<p>Continually improve our knowledge and evidence base on practices:</p> <ul style="list-style-type: none"> Supplier set up process Self-assessment questionnaire Site audits Provision of escalation process through departmental managers and Executive management team 	<ul style="list-style-type: none"> The 2018 self-assessment questionnaire was completed. All suppliers who responded were ranked as low risk. Those outstanding will be contacted again in 2019 and any none response will be escalated to service managers. The responses indicated that the majority of suppliers had implemented measures and policies to address modern slavery. Following feedback, the site audit questions have been amended to include links to further information websites.

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3 Our Organisation

Valpak has been providing 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, the Valpak has approximately 140 personnel.

3.1 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. Within 2018, the number of active direct suppliers was 491.

The majority of these direct suppliers to Valpak are UK based organisations, with less than one percent by spend of purchases being made directly with suppliers outside of the UK. Those services directly sourced from suppliers outside of the UK were all for professional services such as IT or consultancy. It is however recognised that although operating within the UK some suppliers have international operations and for example international end-markets are utilised for recyclable materials.

3.2 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.

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

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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 to the Valpak Audit Committee. 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.

3.3 Supplier Management

Valpak has a significant number of suppliers, providing a wide range of services and goods. 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. To identify the risks of modern slavery within our supply chain, Valpak has implemented a risk assessment approach.

The risk assessment exercise was carried out to allocate a low, medium, high risk rating to each category of supplier. This assessment was a desktop exercise to review the known information about the supplier and supplier categories and information available on the potential risks of modern slavery in terms of the supplier sector and location. Higher risk categories of suppliers were identified as those related to waste management activities.

For all new suppliers, 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. The set-up process includes a request for information regarding the existence of a modern slavery statement and any procedures and policies in place to address modern slavery within their own business and supply chain.

As part of the supplier set up process, Valpak has a Code of Ethics for suppliers which all suppliers are expected to adhere to, or to take steps to become compliant. This includes reference to modern slavery including standards on human rights and employment standards.

For suppliers 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. As these are considered to be within the potentially higher risk category, auditors are asked to raise any concerns that they may have regarding a site in relation to modern slavery site internally or through the national helpline.

A self-assessment questionnaire is sent to suppliers within the high-risk category to ask for further details on their policies and practices to address modern slavery within their own business and supply chain. A review of the 2017

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self-assessment questionnaire was completed in 2018 and all of the suppliers who responded were ranked as low risk. The responses indicated that the majority of suppliers had implemented measures and policies to address modern slavery. No further action was taken as a result.

The 2018 self-assessment questionnaire was sent to key suppliers focussing on recycling services and all suppliers that responded were ranked as low risk overall. Within 2019, the focus will be on smaller suppliers, who may not be required to have a statement themselves, and who have a significant contract with Valpak.

Any suppliers which fail to respond will be contacted again and then any non-response will be escalated to the service managers for review.

4 Our Actions

During the financial year, Valpak has continued to implement its existing practices and corporate policies on business ethics and corporate social responsibility.

4.1 Corporate Policy

Valpak is committed to conducting business with honesty, integrity and openness, respecting human rights and the interests of our employees. There have been no changes to our corporate policies which include the Ethical Policy for staff and suppliers and a corporate social responsibility policy, as we believe that they continue to be in line with the ambitions of the Modern Slavery Act.

4.2 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.

4.2.1 Internal Communication

To help raise awareness:

- the internal employee newsletter has included articles which cover the topic of modern slavery
- the Modern Slavery & Valpak training was delivered to all staff. This covers the issue of modern slavery in a global and national context and how employee can help to tackle the issue

4.2.2 Communication with suppliers

All new suppliers are asked to sign up to the Code of Ethics. The supplier set up process also asks suppliers to confirm whether they have processes in place to address modern slavery within their own business or supply chain.

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5 Looking Forward

Valpak recognise that addressing the risk of modern slavery within our business and the supply chain is an ongoing process and is committed to continual review to ensure that we maintain the commitments set out at the beginning of this statement.

During 2019, Valpak will continue to:

- review our corporate policies and practices to ensure that we are maintaining high standards in relation to action on modern slavery
- raise staff awareness and provide training on the legislation, the risk of modern slavery and how to spot the signs of modern slavery
- roll out the detailed survey of our suppliers on their practices in relation to modern slavery
- respond to any issues identified through site audits or surveys on a case by case basis