

# Anti-slavery & Human Trafficking Policy

(PPP004)



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## 1 Introduction

Papilo has complex supply chains that depend on thousands of people nationally and within the EU. As a value based, privately owned business we recognise the need to protect the rights of both the individuals and the communities touched by our trading activities. This policy sets out the ethical standards expected by Papilo to protect human rights and with regards to modern slavery and human trafficking.

## 2 Policy objectives & purpose

This policy applies to all persons working for or on behalf (in any capacity), including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors & suppliers.

Papilo strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

## 3 Definitions

**Modern Slavery** is a term used to encompass slavery, servitude, forced and compulsory labour, bonded labour, child labour & human trafficking. Modern slavery is a crime and a violation of fundamental human rights (see also RR006 Ethical Trade & Human Rights Policy).

**Human Trafficking** is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

## 4 Who this policy applies to

This policy applies to all key stakeholders engaged in our business activities, including directors, employees, agency workers, seconded workers, volunteers, agents, contractors, and suppliers.

## 5 Our commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection, and reporting of modern slavery in any of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach we will also assess the merits of writing to suppliers requiring them to comply with our Modern Slavery & Human Trafficking Policy.
- Consistent with the above, we may require:
  - i. Employment & recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Modern Slavery & Human Trafficking Policy.
  - ii. Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to our Modern Slavery & Human Trafficking Policy.
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Modern Slavery & Human Trafficking Policy.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

## 6 Human rights & other considerations

As a minimum standard, our sourcing and supply chain activities ensure that the conventions of the international Labour Organisation (ILO) are adhered to by following the Ethical Trading Initiative (ETI) Base Code. The ETI Base Code is accepted as a global reference standard and is widely used as a benchmark against which to conduct social audits and develop ethical trade action plans.

## 7 Director sign-off

<b>Name</b>	Paul Hodgkiss
<b>Position</b>	CEO
<b>Signature</b>	<i>Paul Hodgkiss</i>
<b>Date</b>	06/02/2024

# Document Control

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Version	Version Date	Changes By	Version Notes
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**PP030 V3**

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<b>V1</b>	26/08/2021	MK	Policy implemented
<b>V2</b>	06/11/2023	MK	Policy reviewed (No changes)
<b>V3</b>	13/02/2024	MK	Updated with Papilo branding

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