

Policy	Ref No:	Rev No:
Modern Slavery Policy	POL-09	02

# Our commitment to the principles of the Modern Slavery Act 2015

Nexus Packaging Ltd is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion. We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

## Overview and how we define Modern Slavery

- Slavery, forced labour, servitude, and human trafficking are types of 'Modern Slavery' criminal activity
  that deprives victims of their liberty and usually involves financial and other exploitation.
- We conduct our business fairly, ethically and with respect to fundamental human rights. We are committed to the prevention of all forms of Modern Slavery, both in our business and in our supply chains. We will not tolerate it.
- You must read and comply with this policy if you work for, or on behalf of us in any capacity including as: an employee, director, officer, worker, consultant, volunteer, supplier or service provider.
- Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and us. It could also involve other legal steps being taken against you.
- If you are an employee, this policy does not form part of your employment contract, and we may update it at any time.

## **Preventing Modern Slavery in our business**

- We carry out appropriate checks on all employees, recruitment agencies and suppliers, so that we know who is working for us or on our behalf.
- Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains. Our supply chains are limited and we procure goods and services from a restricted range of UK and EU suppliers.
- We give every employee a written employment contract, and they are paid in accordance with the law.
- We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.
- All employees are required to sign a copy of this policy to show they have read and understood it.] [All managers are provided with training on this policy.] Amend as appropriate.

#### If you are one of our Suppliers

If you supply us with goods or services, you must assess your business and supply chains and confirm to us that you:

- Comply with your legal obligations, in relation to Modern Slavery; and
- Are committed to ensuring there is no Modern Slavery taking place in your business, or in any of your supply chains.

[You must also provide a copy of your anti-slavery policy.]

If you breach this policy, or are found to have Modern Slavery in your business, or knowingly in your supply chain, we may terminate our contract with you and pursue legal remedies against you.

#### If you are an Employee or a Worker providing services for us

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You must immediately report any suspicions of Modern Slavery in our business or supply chains to our directors. Our directors will investigate within a reasonable time, on actions which may require to be taken.

You will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately tell our directors and, if you are an employee, refer to our Grievance and Whistleblowing Policies.

### We will continue to embed the principles through:

- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring staff involved in procurement activity are aware of and follow current modern slavery procurement guidance.
- ensuring that consideration of the modern slavery risks and prevention are added to Nexus Packaging Ltd.'s policy review process as an employer and procurer of goods and services
- making sure Nexus Packaging Ltd procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- continuing to take action to embed a zero tolerance policy towards modern slavery.
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.

This statement has been approved by the directors, for the financial year ending 31 March 2026.

This statement will be reviewed and updated every year.

Signed:

Revised Sept 2025.

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