

Saica UK&I Modern Slavery Act Statement

June 2017



Saica UK&I

Modern Slavery Act Statement

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 2016 to 31 December 2016.

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 Natur, Paper, Pack and Flex. In the UK, the Flex division is new, formed with the acquisition of Americk in December 2016 and as such does not fall within the scope of this year's review.

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

Consequently, our suppliers are predominantly from within the UK & Ireland, 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. Subsequently, we are very proud of the steps we have implemented to combat slavery, demonstrating our dedication to promoting ethical behaviour. 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.
- 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.
- Our policy will be communicated across all levels of the organisation through the addition of this policy into the handbook and employee inductions.
- Our Code of Ethics and Legal Compliance has been communicated and trained to all UK & Ireland employees during 2016, as well as taking a place of prominence on our website from which it can be accessed by all customers and suppliers.
- As mentioned above, the Colleague Handbook contains the Saica Ethical Trading Statement and Policy. The Colleague Handbook also sets out the Saica approach to business, which expressly includes offering "the optimum working environment for the welfare of all our employees". It also includes "observe ethical behaviour" under employees' core skills and behaviours.

Supply Chains:

- Saica has amended its template contracts, to ensure suppliers are expected to abide by the SAICA Code of Ethics which includes anti-slavery. This will cover both new and renewal contracts.
- We have reached a decision to carry out a risk assessment of suppliers, based upon systematic criteria to identify larger higher risk suppliers based on industry, geography or scale. This process is starting in 2017.
- A clear anti-slavery policy will be added into contractor inductions.

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 2016.



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