

# UK Modern Slavery Statement



This statement has been written in accordance with the requirements of the UK Modern Slavery Act 2015. This statement outlines VPK Packaging's commitment, actions and activities regarding efforts to combat slavery and human trafficking within our business and value chain during the period of 1<sup>st</sup> January 2026 to 31<sup>st</sup> December 2026.

## About VPK Packaging

VPK Packaging is one of the UK and Ireland's largest independent manufacturers of corrugated boxes and containers, with facilities in Banbury, Desborough, Limerick, Selby, and Wellington.

We produce corrugated packaging using test and kraft papers, including single and double-walled fibreboard, with a focus on recycled and recyclable materials. Our products are primarily used as secondary packaging, though our Wellington facility also manufactures food-contact packaging, all of which complies with relevant legal and regulatory requirements.

Our services include the design and conversion of packaging for high-volume transit cases, e-commerce, and retail-ready formats.

## Our Commitment

VPK Packaging is committed to acting ethically and with integrity in all business relationships. We take a zero-tolerance approach to all forms of modern slavery, including forced labour, servitude, human trafficking, and child labour. We are dedicated to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within our own operations or those of our supply chain partners.

## Policies and Governance

We have established a robust internal framework to support our commitment to eradicating modern slavery. Key policies include:

- **Code of Conduct:** All employees and suppliers are expected to operate in line with our ethical standards. Topics include equal treatment, health and safety, anti-corruption, conflicts of interest, and respect for human rights.
- **Whistleblowing Policy:** Provides a confidential channel for employees to report any concerns, including those related to unethical or unlawful labour practices. Disclosures can be made without fear of retaliation.
- **Ethics and Compliance Framework:** Integrated across onboarding, training, and day-to-day operations to foster a culture of integrity and accountability.

The Senior Leadership Team oversees the implementation of these policies and is responsible for reviewing and updating this statement annually.

## Supply Chain Management

We maintain a strict supplier compliance programme and expect all partners to uphold the same high standards. This includes:

- Completion of Self-Assessment Questionnaires (SAQs) and provision of relevant certifications.
- Use of a Group/Local Approved Suppliers List, aligned with our BRC accreditation.
- Conducting supplier audits based on a risk-based assessment, especially in high-risk regions or sectors.
- Ongoing supplier performance monitoring through complaint analysis, contract management, and trial orders where necessary.

We expect all suppliers to treat workers with dignity and respect, provide safe working conditions, and operate in full compliance with applicable laws, including those relating to modern slavery.

# UK Modern Slavery Statement



## Training and Awareness

To support identification and prevention of modern slavery, we deliver targeted training across the business. All relevant employees receive mandatory, recurring training modules as part of our wider compliance programme. Training covers:

- Forms and indicators of modern slavery
- Key provisions of the Modern Slavery Act 2015
- How to escalate concerns internally

In addition, information and guidance are readily available on the company SharePoint site and through the HR department.

## Ongoing Improvement and Future Actions

Looking ahead, we will:

- Continue to develop and refine our due diligence processes
- Expand employee training and supplier engagement
- Review and enhance supplier risk assessments using regional, operational, and industry data
- Monitor and report on the effectiveness of our controls using key performance indicators

We remain committed to collaborating across our industry and value chain to promote transparency and accountability in all areas of our business.

## Statement Approval

This statement was reviewed and approved on 2<sup>nd</sup> March 2026 by the Company's Senior Leadership Team, who review and update it annually.

A handwritten signature in black ink, appearing to be 'Paul Barber', written over a horizontal line.

Paul Barber  
Interim Managing Director – UK & Ireland