

## HUMAN RIGHTS AND MODERN SLAVERY POLICY

### OUR APPROACH

Nice-Pak recognises its responsibility to respect human rights throughout all areas of its operations, including its supply chain and to act in a responsible and ethical manner. We are committed to ensuring that people are treated with dignity and respect by upholding internationally recognised human rights principles encompassed in the Universal Declaration of Human Rights and the ILO (International Labour Organisation's) Declaration on Fundamental Principles and Rights at work.

To implement the UN guiding Principles on Business and Human Rights and ensure compliance with the Modern Slavery Act, 2015.

To recognise and manage the risk of harm associated with our business including:-

- *Modern slavery – human trafficking and forced or bonded labour,*
- *Unsatisfactory working conditions,*
- *Discrimination,*
- *Lack of Freedom of Association,*
- *Excessive working hours and illegal wage rates*

Our approach extends to both our role as an employer and as a customer when sourcing suppliers. As we qualify measure and evaluate all of our suppliers, we will consider the above areas of risks.

We have identified four key stakeholder groups who have the greatest potential to be impacted or harmed and where our attention should be primarily focused and these are:-

- People working for our suppliers
- People working for service providers to Nice-Pak – in particular, our temporary labour suppliers
- Colleagues of Nice-Pak
- Communities local to our sites

It is our belief that applying this approach is essential to our long-term business success.

### OUR COMMITMENT

We are committed to putting in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business (including our supply chains) or breaches of the UN guiding principles on Business and Human Rights (UN Guiding principles).

In relation to the risk areas, we make the following commitments:-

#### **MODERN SLAVERY**

We will not and do not condone or use any form of forced labour, including indentured, prison, bonded or slave labour. Nor do we use any form of child labour. We comply with all minimum age provisions of local laws. Furthermore, physical or verbal harassment or abuse to discipline employees is not tolerated.

#### **WORKPLACE CONDITIONS**

We will provide a safe, healthy and secure workplace for all employees. Proper sanitation, lighting ventilation and fire safety protection are provided.

We recognise and support an employee's right to raise concerns (anonymously if they wish) about any element of their working relationship. Any employee raising a genuine concern will not be subject to detriment.

#### **DISCRIMINATION**

Our employment practices prohibit discrimination on the basis of legally-protected characteristics (age, nationality, race, religion, social or ethnic orientation, gender or disability). This extends to recruitment, hiring, placement, training, compensation, treatment and advancement of employees.

#### **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

We respect employee's rights to freedom of association. We also recognise that collective consultation within a workplace is to be encouraged. We do this via established workers councils at each of our sites.

#### **WAGES, BENEFITS AND WORKING HOURS**

We will compensate employees relative to the industry and or local labour market. We will operate in full compliance with local wage/hours and benefits laws e.g. working time directive, minimum wage legislation.

Processes and procedures are in place to monitor our compliance in each of these areas and we will report on our progress and fulfilment against this policy annually.

APPROVED BY: *N. Maiten*  
JOB TITLE: *HR Manager*  
DATE: *25th August 2022.*