

MODERN SLAVERY STATEMENT
FISCAL YEAR 2023

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR PLASTRIBUTION LIMITED FOR THE FISCAL YEAR ENDING 31 MARCH 2023

For the purposes of this statement, the term “Plastribution” refers to Plastribution Limited (01461218) and its subsidiary, Eagle Plastics Limited (02915093).

Plastribution publishes its Slavery and Human Trafficking Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 “Transparency in Supply Chains”. This Statement sets out the steps Plastribution has taken to address the risk of slavery and human trafficking taking place with the operations and supply chains of Plastribution.

STRUCTURE AND SUPPLY CHAIN

Plastribution is a wholly owned subsidiary of ITOCHU Europe PLC. Plastribution is a Group of divisional business units:

| SECTOR | BUSINESS UNIT | DESCRIPTION |
|----------------|------------------------------------|--|
| Polymer Sector | PLASTRIBUTION | The distribution of thermoplastic raw materials for injection moulding, extrusion, and blow moulding industries. |
| | PLASTRIBUTION SPECIALITY CHEMICALS | The distribution of curing and crosslinking agents to civil, automotive, and domestic sectors. |
| | ELASTRIBUTION | The distribution of elastomers for rubber product processing and related industries. |
| Product Sector | PLASFILMS | The distribution of films and provider of supply chain services predominantly for the labelling and packaging industries. |
| | PLASFOILS | The distribution of PVC and PET foils for doors and panelling systems. |
| | EAGLE PLASTICS LIMITED | A subsidiary of Plastribution who specialise in the distribution of thermoplastic sheet. |
| Agency | APLAS | Agency specialising in managing customer relationships, referrals, and intermediary functions for major polymer suppliers. |

Plastribution is headquartered in Ashby-de-la-Zouch, United Kingdom. Eagle Plastics Limited (“Eagle Plastics”), a subsidiary of Plastribution, with operations out of Leicester, United Kingdom.

In total, Plastribution has 99 employees, with 9 employees from Eagle Plastics.

Plastribution has a network of suppliers that ranges from large, multi-national suppliers too small to medium businesses globally. Plastribution recognises and undertakes its responsibility to ensure proper due diligence before trading with business partners but also ongoing due diligence throughout the relationship.

POLICIES

Plastribution has coherent policies that are explicit about slavery and human trafficking. These policies are applicable to all personnel and organisations associated Plastribution.

Staff Handbook

The Staff Handbook is applicable to all members of staff within Plastribution – the publication covers key topics surrounding corporate governance, compliance, equal opportunities and expected conduct within the workplace.

It is a pre-requisite that all employees adhere to the Staff Handbook. The Staff Handbook is freely available to all members of staff through the Plastribution intranet and shared drive.

Corporate Compliance Policy

The Corporate Compliance Policy is considered the foundation to Plastribution’s business practices – it communicates Plastribution’s commitment to *Sampo-Yoshi*; that is to ensure Plastribution acts in the interests of all by trading in a socially responsible, ethical way. It covers a range of important topics – however – for the purpose of this statement it outlines Plastribution’s commitment to ethical trading in line with ETI Base Code and the UN’s Guiding Principles on Human Rights. In addition, Plastribution is fully committed to providing equal opportunities for all employees and job applicants, and to the elimination of unlawful and unfair discrimination.

Ethical Trading Policy

The Ethical Trading Policy details the training, due diligence, and principles that all associated persons and organisations are required to adhere to. This follows the principles held within the ETI Base Code and UN Guiding Principles on Human Rights.

Recruitment

Plastribution conducts 'right to work' checks on all potential employees prior to their start date. This includes checking their age and, where applicable, their visa status.

Reporting

Plastribution operates a dual reporting system for compliance breaches. Employees can contact the Plastribution Compliance Officer directly at any point to highlight a potential compliance breach – this includes potential human trafficking and slavery.

Alternatively, employees have access to a confidential, external, hotline provided by ITOCHU Corporation that will allow for anonymity of the reporter and external remedy. Details of the ITOCHU Compliance Hotline are contained within the Corporate Compliance Policy.

In fiscal year 2022 – Plastribution has had no report of compliance breaches via either reporting routes. In the event of a report, Plastribution and ITOCHU have robust procedures to address the issue and protect victims.

TRAINING

All Plastribution employees are required to conduct quarterly mandatory training in compliance and health and safety topics. Within the training programme, staff conduct training on risks surrounding human trafficking and slavery. This training is re-enforced through regular Business Updates conducted by the Managing Director and Compliance Updates from the ESG and Compliance Department.

RISK OF HUMAN TRAFFICKING AND SLAVERY WITHIN THE SUPPLY CHAIN

Based on a current assessment, the risk of slavery and human trafficking with Plastribution is low. Plastribution employs personnel on standard contracted terms that incorporate current employment legislative requirements to ensure rights are protected.

Plastribution has a global network of suppliers of goods and services from approximately 480 suppliers, based in 35 countries. Plastribution operates predominately within Europe – however, Plastribution also sources from Asia, the Middle East, and the Americas.

Plastribution uses indicators to assess the ethical risk of a supplier:

- Corruption Perception Index;
- Freedom House Status
- QMS

Plastribution has implemented a new supplier and customer onboarding process that will directly challenge the ethical nature of their business practices through self-audit, Compliance Officer sign off and increased frequency of visits.

A focus will be on new suppliers and customers but also high-risk suppliers that have been identified via the indicators above.

CONTINUOUS IMPROVEMENT

Plastribution will continue to place ethical trading and social responsibility as its foundation to business – Plastribution's policies provide an effective measure to prevent slavery and human trafficking, however, Plastribution recognises that its mitigating measures must continue to evolve.

Holistic due diligence will be conducted in fiscal year 2023 to ensure risks are identified. The reviewed Corporate Compliance Policy will be communicated and published accordingly – this will be re-enforced through mandatory training for all staff.

APPROVAL

This statement has been reviewed by the Board of Directors of Plastribution Limited and is approved on behalf of the Board by the Managing Director.



Mike Boswell
Managing Director