



**Palm Paper Limited 2021/22 Financial Year**  
**Modern Slavery Act 2015 - Statement**

**General Statement**

This statement is in accordance with the Modern Slavery Act 2015, and sets out the steps and action which the Company has taken, and will take to ensure Slavery and Human Trafficking is not, and does not take place in its supply chains or in any other part of its business.

Whilst the provision of goods, services and raw material to the Company is a diverse and complex operation, robust management systems are in place to ensure the company's ethical standards are applied, whilst ensuring legal compliance within the UK and overseas.

**Supplier Standards**

As a part of the procurement process, a preferred supplier listing and a multi-level purchase verification and approval system are in place prior to any order or contract being entered into.

In addition, the company's values and standards are clearly communicated through ISO Certification in Management, Safety, Environmental and Energy Management, which together with the following comprehensive policy documents dictate the ethical standards required from all staff and suppliers:

- Ethics and Values Policy
- Equality and Diversity Policy
- Bribery and Corruption Policy
- Modern Slavery and Human Trafficking Policy
- Whistleblowers Policy

**Primary Verification Process**

In addition to the above tender process, management standards and policy documents, the primary approach to ensure continued legal compliance with the Act is through maximising established and proven ethical suppliers from low risk countries.

The risk level is determined through supplier verification and risk assessments, which are based upon:

- Geographical location
- Service provision
- Materials or services supplied
- Values and ethics standards
- Historical data and previous association with the Company



Based on these assessments it is not currently considered that any supplier to Palm Paper Limited currently fall within a high-risk category.

### **Secondary Verification Process**

In addition to the primary assessment process, a secondary self-certification and declaration programme has been implemented.

The self-certification process requires all new and existing suppliers to both confirm their understanding of the company's standards, and declare their compliance with the Modern Slavery Act 1995, providing support documentation where requested.

It also require suppliers to verify the steps they have taken to ensure they carry out due diligence assessments and monitor their own suppliers and third parties.

### **None Compliance**

In the avoidance of doubt, it is mandatory that any organisation or individual working with or for the Company, including all sub-contractors, full comply and abide by the legislative requirements in relationship to:

- The Modern Slavery Act 2015
- An Individual's Right to Basic Pay & Working Conditions
- An Individual's Human Rights
- The Organisations Corporate Responsibility
- An Individual or Protected Group's Equality of Treatment
- The Bribery Act 2012
- The Health & Safety at Work Act 1974
- All Environmental Requirements and Acts

A zero tolerance approach will be taken where these responsibilities are not met, and as such, we reserve the right to immediately terminate the relationship with any third party if issues of none compliance are identified, and where such matters are not immediately addressed.

### **Summary**

The Company remains fully committed to preventing involvement with any organisation directly or indirectly involved in Modern Slavery, Human Trafficking or Child Labour.

It only conducts business with ethically sound, verified and compliant suppliers and adopt a zero tolerance approach where breaches are identified and not rectified, and through due diligence checks reduces the risk of entering into contracts with high risk suppliers.



This Statement has been reviewed, approved and will be enforced by the Palm Paper Board of Directors.

Dr Wolfgang Palm  
CEO Palm Paper Limited