

CAPS CASES

Modern Slavery Declaration

Organisation's structure

Caps Cases Ltd is one of the largest independent, a family-run business, multi-site manufacturers of corrugated cardboard packaging in the UK. Caps Cases Ltd manufacture and supply corrugated packaging products which are used by the customers to provide a secondary packaging medium to their products.

We know that slavery, servitude, forced labour, compulsory labour and human trafficking is a significant issue given the increase in global migration. Caps Cases has a zero-tolerance approach to any kind of modern slavery found within our own operations or our supply chain.

Our policies

Caps Cases have in place policies that set out our ambition, processes, and resources to ensure our products are produced to acceptable standards. This will aid our employees to identify and report any concerns with modern slavery via the appropriate channels and allow a full investigation without putting any of our staff or those affected at risk.

The following policies are available to all staff

- Code of conduct
- Ethical Policy
- Whistleblowing Policy
- Personal harassment Policy
- Grievance Policy
- Equal Opportunities Policy
- Anti-bribery Policy
- Disciplinary procedure

All of our employees are governed by the Code of Conduct which provides a guide to legal and ethical responsibilities and points them to the information and the resources needed to exercise sound decision-making on the job. Employees are required to be familiar with the Code and all Group policies, to apply them every day and ask questions if they are ever unsure of the correct action to take. All employees receive training during their induction and the code is updated and re-issued when required.

Caps Cases undertake regular audits to ensure that all of our employees are paid at least the National Minimum Wage and have the right to work in the UK. We only engage subcontractors who are pre-vetted and made aware of our policy regarding Modern Slavery. Caps Cases ensure that any concerns about slavery or human trafficking can be raised through the appropriate channels, which in the first instance is through Nick Drewry. We also provide training to all employees who are involved in the supply chain on issues relating to slavery and human trafficking.

Our supply chains

We have implemented a due diligence process, detailed below which is deemed appropriate to our business, to ensure there is no slavery and human trafficking in our supply chain.

We will not engage in any activity, practice or conduct that would constitute an offence under the Modern Slavery Act 2015

Due diligence

Caps Cases will undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

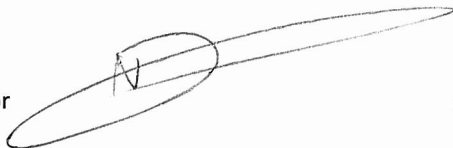
- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans, if applicable;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, up to the potential termination of the business relationship.

We are not aware of any slavery or human trafficking taking place in our business or supply chain and we shall continue to apply appropriate due diligence to comply with the Modern Slavery Act 2015.

Declaration has been approved by the Directors and will be reviewed and updated annually.

Nick Drewry

Finance Director

A handwritten signature in black ink, consisting of a stylized 'N' followed by a long, sweeping horizontal stroke.

Date 21/10/22.