



DART PRODUCTS EUROPE LTD.

Modern Slavery Statement

Introduction

This statement sets out Dart Products Europe Ltd.'s ("Dart") actions to put steps in place to ensure that there is no slavery or human trafficking in the business or the business' supply chains. This statement relates to the actions and activities during the financial year 1 April 2017 – 31 March 2018.

As part of food packaging industry we recognise that we have responsibility to take a robust approach to slavery and human trafficking.

We are absolutely committed to preventing slavery and human trafficking in our corporate activities and to ensuring that our supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

Dart Products Europe is a part of a global organisation Dart Container which is an acknowledged leader in the manufacture of single-use food and beverage packaging products, with distribution across the globe. Dart Container companies operate in more than 40 locations in seven countries and has about 15,000 employees worldwide.

Dart Products Europe Ltd. is based in 2 locations in the UK (Huntingdon and Cradley Heath) and employs almost 500 people. It currently works with 205 suppliers predominately based in the UK, EU and USA. There are also 4 suppliers in China, Hong Kong and Indonesia, the areas that are considered to be high risk for the abuse of human rights. Expenditure in these high risk areas is under 2% of the total company spend.

Employing people

Dart operates the following policies to identify modern slavery risks and prevent slavery and human trafficking in its operations:

Whistleblowing policy

The policy is in place to provide employees with the means to raise any concerns about any malpractice including the risk of slavery or human trafficking. The policy is designed to make it easy for workers to make disclosures without fear of retaliation.

Grievance Policy

This Policy will apply to all employees and will cover all cases where an employee wishes to raise a particular grievance in connection with their employment. All Supervisors and Managers have a responsibility to ensure that grievances are dealt with as fairly and promptly as possible.

Employee Code of Conduct (Huntingdon)

The code makes it clear to employees the actions and behaviour expected of them when representing the company. Specific reference is made to not using forced child labour and a minimum hiring age of at least 18 year old is set for full-time regular roles.



DART PRODUCTS EUROPE LTD.

Recruitment policy

Dart adheres to its Recruitment policy which specifically stipulates the requirement to check relevant personal identification of all potential hires for their eligibility to work and their age. Where external recruitment agencies are involved, Dart only uses the agencies approved by The Recruitment & Employment Confederation or those that have a clear policy on Modern Slavery. All employees are issued with the written statement of the terms and conditions of their employment at the start of their employment.

Prevention of Illegal Working policy and procedure (Huntingdon)

The procedure applies to all potential and current employees. It provides a detailed guidance on the checks required to ensure that Dart only employs individuals who are legally allowed to work in the UK. An updated policy is currently being drafted which will apply to both UK sites.

Working Time Directive

Dart operates in compliance with its obligations under the Working Time Regulations 1998 and informs employees of their rights under those regulations.

Wages and Benefits

All employees are paid their lawful wages, including overtime and shift premium where applicable. The principle of equal pay for equal work is applied without discrimination. All employees are issued with pay slips and the payroll records are maintained accurate and available for audits.

Working conditions

All workers receive communication and training on emergency and safe work procedures.

Due Diligence

Dart undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. All suppliers are required to successfully complete a thorough approval process in order to become a supplier to Dart. Once approved, suppliers undergo regular review to confirm they still operate to the standards required by Dart. Each plant has an appointed manager with the responsibility for reviewing the requirements and auditing the suppliers for compliance.

Training

Dart requires all employees working in supply chain and HR functions to complete internal training, which covers understanding the signs of modern slavery and what to do if modern slavery is suspected to be taking place within our supply chain.

This statement was approved by the Board of Directors on 11 October 2018

Name (Director).....Thomas Jewell.....

Signature..........

Date.....11 October 2018.....