



**DART PRODUCTS EUROPE LTD.**

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## **Modern Slavery Statement**

### **Introduction**

This statement sets out Dart Products Europe Ltd.'s (Dart) action plan in place to ensure there is no slavery or human trafficking in our business or our supply chains. This statement relates to the actions and activities during the financial year; 1 April 2021 – 31 March 2022.

As part of the food and beverage packaging industry, Dart recognizes we have the responsibility to take a robust approach against slavery and human trafficking.

Dart is committed to acting ethically and responsibly in all our business relationships and has zero tolerance for slavery and human trafficking in any part of our business or supply chain. We are a member of SEDEX and adhere to the Ethical Trading Initiative Base Code.

### **Organisational Structure and Supply Chains**

Dart Products Europe Ltd. is part of Dart Container Corporation, an industry-leading manufacturer of food and beverage packaging with worldwide distribution. Dart has approximately 13,000 employees in more than 30 locations in four countries.

Dart Products Europe Ltd. is based in Cradley Heath, West Midlands and employs approximately 115 people. We currently work with 343 suppliers predominately based in the UK, EU and USA.

### **Employing People**

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

### **Whistleblowing Policy**

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

### **Grievance Policy**

The policy applies to all employees and covers all cases where an employee wishes to raise a particular grievance in connection with their employment. Supervisors and Managers have a responsibility to ensure that grievances are addressed as fairly and promptly as possible.

## **Recruitment Policy**

Dart's recruitment policy specifically stipulates the requirement to check relevant personal identification of all potential hires for their age and eligibility to work in the UK. Where external recruitment agencies are involved, Dart only uses agencies approved by The Recruitment & Employment Confederation or those that have a clear policy on modern slavery. We provide all employees a written statement of the terms and conditions of their employment at the start of their employment.

## **Legal & Social Accountability Policy**

Dart operates in compliance with our Code of Conduct and Legal and Social Accountability Policy by adhering to all local and national laws wherever Dart conducts business and upholding a high standard of ethics. To that end, Dart is committed to adhering to and ensures all employment practices comply with the Ethical Trading Initiative Base Code.

## **Working Time Directive**

Dart operates in compliance with our 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 premiums where applicable. The principle of equal pay for equal work is applied without discrimination. Dart issues pay slips to all employees, accurately maintains payroll records and makes them available for audits.

## **Working Conditions**

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

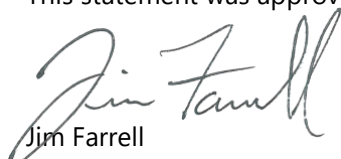
## **Due Diligence**

Dart undertakes due diligence when considering new suppliers and regularly reviews our existing suppliers. Suppliers are required to successfully complete a thorough approval process to become a Dart supplier. Once approved, suppliers undergo regular review to confirm they still operate to Dart-required standards. Each facility has a manager appointed with the responsibility for reviewing the requirements and auditing suppliers for compliance.

## **Training**

Dart requires all employees working in supply chain and HR functions to complete internal training that covers the signs of modern slavery and actions to take if modern slavery is suspected to be taking place within our organization or supply chain.

This statement was approved by the Executive Leadership Team on 5 April, 2021.



Jim Farrell  
Executive Vice President  
People, Culture & Communications  
05 April, 2021