



Modern Slavery Statement

Organisation

This statement applies to Springpack Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2022.

Organisational structure

Springpack Ltd is a family owned business. The business has one centralised office from which all employees work which is based in Worcester, UK. There is a leadership team that oversee the strategy and day to day running of the business. They report to the Board which consists of the owners and the Managing Director.

The Organisation is a carbon neutral company with a major part of our mission being to provide our customers with best-in-class eco-friendly protective packaging products and services. We supply products for all applications. From cardboard boxes and bespoke branded strapping solutions to our own environmentally friendly range of tapes, void fill, films, pallet wrap and bags

The labour supplied to the Organisation in pursuance of its operation is carried out in Worcester in the UK.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

Supply chains



In order to fulfil its activities, the main supply chains of the Organisation include those related to the supply of packaging materials from various suppliers around the World, including the UK, Europe and Asia.

Potential exposure

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited, nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Impact of COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation concludes that the COVID-19 pandemic did/did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.

During the pandemic, the Organisation's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewed supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- put measures in place to identify and assess the potential risks in its supply chains
- undertaken impact assessments of its services upon potential instances of slavery
- created action plans to address risk to modern slavery
- actions taken to embed a zero tolerance policy towards modern slavery

Key performance indicators

The Organisation has set key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

Policies

The Organisation has the following policies which further define its stance on modern slavery

- equality and diversity policy
- supplier code of conduct

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer (People Director), to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Amendments to Policy

Date	Person	Brief Outline	Approval Date	Approver
2023	Rachel Holmes	Policy Created	2023	James York