



FILTRONA GROUP

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

Version: 0.1 Date Of Issue: 1st Jan 2023
Owner: Legal, Compliance, Risk & Governance (LCRG)



1. INTRODUCTION

1.1 Overview

Filtrona Group (“Company”) is committed to doing business the right way, to continually earn the trust of customers, stakeholders and the wider marketplace. In accordance with the Company **Ethics Code**, the **Executive Leadership Team** (“ELT”) expect all employees – and anyone carrying out work on behalf the Company – to maintain the highest standards of ethical business conduct and personal behaviour at all times, and to act safely, honestly, responsibly, lawfully and with integrity.

1.2 Scope

This **Anti-Slavery & Human Trafficking Policy** (“Policy”) is to prohibit and pursue the prevention of slavery and human trafficking and any activity that facilitates modern slavery.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Company has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the Company's business or **in any of its supply chains**.

The Company is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the **UK Modern Slavery Act**.

The Company expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, includes as appropriate specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

The Company **expects all of its suppliers** to hold their own suppliers accountable to the same high standards of ethics and integrity.

2. COMPLIANCE

All employees are required to comply with this Policy, and are personally responsible for doing so. Employees must certify their compliance with the terms of this Policy on at least an annual basis.

From time to time, the Company may require you to take mandatory training in relation to the terms of this Policy. You must ensure that you complete this training as required.

If any employee believes that the terms of this Policy are not being correctly observed, it is their responsibility to raise any concerns with their Line Manager. If employees feel that they need to raise the issue outside of their immediate working environment at any time, the Company has put in place, through an independent third party, the '**Filtrona Group EthicsPoint Helpline**'. This is a confidential call centre manned 24 hours a day by appropriately trained, local language speaking individuals, and the relevant telephone numbers are displayed at each Filtrona Group business location.



Alternatively, employees can submit a report through the '**Filtrona Group EthicsPoint Portal**' and file a confidential concern. The Company is committed to ensuring that employees feel able to raise concerns openly and in good faith under the '**Right to Speak**' Policy, without fear of reprisal or retaliation, and with the support the Company.

Failure to observe the terms of this Policy – or to cooperate fully with any investigation by the Company into alleged or suspected breaches – may result in any employee's conduct being subject to review. In the most serious cases, such review may potentially lead to the termination of their employment and/or result in personal criminal or civil liability.



Version Control:

No./Version	Revisions	Effective Date	Owner	Approver	Status
001	Updated policy in the name of the Filtrona Group	1 st Jan 2023	Shahid Ali	Patrick Meredith	Approved