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Board24 Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out Board24 Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. Board24 Ltd is committed to improving our practices to combat slavery and human trafficking. We have developed, and continue to develop, processes to identify breaches of human rights, including slavery and human trafficking, in our supply chain.

As part of UK manufacturing sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and take appropriate steps to review our potential risks in this area.

Organisational structure and supply chains

This statement covers the activities of Board24 Ltd:

- Board24 Operates within the UK and Ireland and is a manufacturer and seller of corrugated cardboard. The business operates a predominantly UK and mainland European supply chain ranging from raw material and machine purchases to the sourcing of services, usually from our mainline equipment manufacturers.
- We have circa 400 employees based at Coalville, Preston and Larkhall, and an annual turnover of £190 million per annum

Countries of operation and supply

We currently operate in the following countries:

- UK and Ireland sales. Board24 sells its product to UK and ROI businesses, no sales to any
 other countries external to those at the current time. Of the three business locations, two
 are based within England and one is based within Scotland.
- Our supply chains include: paper, starch, pallets, haulage, and energy. The majority of our purchases are from the UK and countries within the EEA. We do not trade with countries which are the subject of sanctions or embargoes imposed by either the United Nations or the UK government

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

• Firstly, a review of the industry and country of operation of a supplier is undertaken to identify and heightened risks over and above the norm. All new suppliers must review our







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policy and return our questionnaire to be set up on the system. This is review internally to identify any heightened risks related to modern slavery and human trafficking.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

• The business does not currently have any activities which have been deemed high risk through our processes, but this is under periodic review.

Responsibility

Responsibility for our anti-slavery initiatives is as follows

- Policies: The Senior management team at Board24 is responsible for the setting and review
 of business policies and practices. This includes our own anti-slavery and ethical standards
 policies
- Investigations/due diligence: if a suspected issue arose in relation to modern slavery / human trafficking, it would be the responsibility of the senior management team to investigate and implement appropriate actions.
- **Training:** Training to senior leaders has been delivered, the management team is looking to implement more regular training for leaders around the business.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- Modern Slavery & Human Trafficking Policy: The policy outlines the commitment and responsibilities of Board24 Ltd in reviewing and managing areas of concern and risk in relation to modern slavery and human trafficking.
- Ethical Standards Labour Values Policy: The policy outlines the commitment from Board24
 to high ethical standards and values throughout the business. The policy covers the
 following key areas
 - o the use of child / forced labour
 - freedom of working choice
 - o the right to collective bargaining
 - safe and hygienic working conditions for all employees
 - discrimination
- **Grievance & Disciplinary Policy:** The policy outlines processes to following in raising issues, particularly those related to individuals through the business and the appropriate processes and actions that should be taken as necessary.
- **Protecting The Business Policy:** Inclusion of areas such as whistleblowing and social media which are both relevant to Modern the Modern Slavery and Human Trafficking Policy.







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• **Equal Opportunities Policy:** Acknowledge and highlights the lawful conduct in relation to discrimination and the treatment of individuals within Board24 and its stakeholders.

Board approval

This statement was approved in August by our board of directors, who review and update it annually.

Signature:

Name:

Frank Hay
Managing Director
Board24

Date:

August 2024

