

Modern Slavery Statement

Policy statement

Modern Slavery can take many forms including the trafficking of people, forced labour, servitude, slavery, and any other deprivation of a person's liberty to create a personal or commercial gain. Bericap UK takes a zero-tolerance approach to modern slavery. We are committed to ensuring that modern slavery or human trafficking plays no part in our supply chain or in any part of our business.

Bericap UK 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 or the threat of abuse.
- Being dehumanised, treated as a commodity, or being bought or sold as property.
- Being physically constrained or having restrictions placed on freedom of movement.

Bericap UK undertakes due diligence when considering appointing new suppliers. We set out clear expectations and evaluate the modern slavery and human trafficking risks of each new supplier. Our policies, procedures and code of conduct are pursuant to section 54(1) of the Modern Slavery Act 2015, and we review our Modern Slavery policy every year.

Bericap UK Limited is a wholly owned subsidiary of the German private family owned Bericap Group engaged in the manufacture of caps and closures for the purpose of packaging customer products.

We expect our staff, contractors, suppliers, customers, and other business partners to report any concerns and for Bericap UK management to act upon them.

This policy applies to all persons working for Bericap UK, on our behalf, or in any capacity associated with our business. This includes:

All employees
Directors
Officers
Agency Workers
Seconded Workers
Volunteers
Interns and work experience
Agents and contracted staff
Consultants and advisors
Business Partners

This policy does not form part of any employee's contract of employment, and we may change or amend it any time.

Responsibility

The Managing Director, with the support of the Board of Directors, and the site Senior Management Team have overall responsibility for ensuring this policy complies with our legal and ethical obligations, including any person or organisation under our control.

Our HR, Quality, and Supply Chain Management have shared primary and day-to-day responsibility for implementation, continually measuring its use and effectiveness. All internal audits and controls are undertaken by these individuals and concerns should be reported directly to them.

Management throughout the business are responsible for ensuring the policy is cascaded and complied with, including regular training given to staff, especially those involved in the management and appointment of suppliers and subcontractors.

Compliance

1. You must read, understand, and comply with this policy.
2. Prevention, detection and reporting of any event or instance which may be deemed as modern slavery, in any part of our business or supply chain is the responsibility of anybody appointed to work on behalf of the company, directly employed or otherwise appointed.
3. You must notify your line manager, HR/H&S department immediately if you believe or suspect a conflict of this policy has or may occur.
4. You are encouraged to raise concerns as soon as possible and will be appropriately protected in a confidential, anonymous nature for doing so.
5. If you are unsure of a suspicious event constitutes modern slavery, please raise it with your line manager immediately.
6. Your line manager is responsible to ensure your concerns are communicated in writing to the site Senior Management Team

Communication

Some of our projects require subcontract organisations to carry out work and services on our behalf. We are committed to ensuring that slavery and human trafficking plays no part in our supply chain or any part of our business.

As part of our initiative to identify and mitigate risk:

1. We create long-standing relationships with our suppliers and subcontractors and make clear our expectations of business conduct.
2. We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
3. Our policy, code of conduct and ethical trading policy form part of our induction process for all individuals who work for us at any location or project site, this includes initial employee inductions and site inductions.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff.

Breaches

Any employee or appointed person who breaches this policy will face disciplinary action.

Employees or appointed persons may be suspended immediately pending further investigation.

We may terminate relationships with employees, individuals and organisations working on our behalf if they are shown to have breached this policy.

Review

This policy shall be reviewed on an annual basis and amended as and when necessary to reflect changes in relevant legislation.

During 2025 our focus will be to maintain training. We will ensure all employees new and existing complete applicable training to their role, and our code of conduct and ETI base code are communicated to support in the compliance of this statement.

Bruce Margetts

Managing Director

Bericap UK Limited

Date of current issue: February 2025

Date of next review: February 2026