

# Modern Slavery & Human Trafficking Policy

## Purpose

The purpose of this policy is to set out D A Pak Ltd.'s approach to preventing modern slavery and human trafficking within our business and supply chains. It demonstrates our commitment to ethical trading, compliance with the Modern Slavery Act 2015, and protecting the fundamental rights and freedoms of individuals who may be impacted by our operations.

## Scope

This policy applies to all individuals working for or on behalf of D A Pak Ltd, at all levels and in all capacities. This includes employees, directors, officers, agency staff, contractors, consultants, suppliers, and any other business partners. The policy also extends to our global supply chain, where we require suppliers to adhere to the same standards and practices.

## Policy Statement

- D A Pak Ltd has a zero-tolerance approach to modern slavery and human trafficking.
- We are committed to acting ethically and with integrity, and to ensuring effective systems and controls are in place to prevent slavery and human trafficking in our own business and supply chains.
- This policy supports our wider corporate responsibilities, sustainability values, and compliance with the Modern Slavery Act 2015.

## Responsibilities

- The Board of Directors has overall accountability.
- Senior Management are responsible for implementation, monitoring, and auditing.
- Managers ensure awareness, training, and compliance within their teams.
- All employees are responsible for reporting concerns without fear of retaliation.

## Prevention & Due Diligence

- Conduct risk assessments of business operations and supply chains.
- Engage suppliers on compliance with this policy.
- Include contractual provisions requiring suppliers to prohibit forced labour and allow audits.
- Apply supplier pre-screening and monitoring where risk is identified.

## Compliance & Reporting

- All employees must read, understand, and comply with this policy.

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- Concerns must be reported to line managers, HR, or Directors.
- Whistleblowers are protected by law and detrimental treatment will not be tolerated.

### Training & Awareness

- Training at induction and refreshed as required.
- Clear communication of our zero-tolerance stance to all suppliers and partners.

### Breaches

- Breaches by employees may result in disciplinary action up to dismissal.
- Breaches by suppliers or partners may result in termination of contracts.