

# Human Rights Policy



As a UK manufacturer and international distributor, Euro Packaging UK Ltd interacts with numerous right holders such as individuals and organisations on a daily basis as part of its normal operations. We have therefore a responsibility to respect the human rights of our colleagues, our customers, the communities we operate in and the people who work throughout our supply chain.

To this purpose, we are committed to upholding all internationally recognised human rights, understood, at a minimum, as those expressed in the *International Bill of Human Rights*<sup>1</sup> and the *International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work and Conventions*. We are particularly aware of the right to Free Prior and Informed Consent (FPIC) and will conduct due diligence to obtain FPIC even if national law does not require it. Furthermore, this Human Rights Policy consolidates our existing commitments and brings increased clarity on our processes and procedures.

Through proactive due diligence aligned with the *UN Guiding Principles on Business and Human Rights*, the *UK Modern Slavery Act* and the *ETI Base Code*, we seek to avoid adverse human rights impacts resulting from our own activities (actions and omissions), and complicity in the adverse impacts caused by others (business relationships that are directly linked to our operations, products or services).

We are committed to providing access to effective remedy in the event that we cause or contribute to an adverse impact, while preventing repercussions against the reporter. Our ongoing work is to embed human rights considerations in all relevant business decisions. This commitment applies to our own operations, our products/services and our business relationships, including our supply chain.

## Key Areas of impact

Through human rights assessments, informed by internal & external experts, to determine relevant right holders and potential for our most salient human rights issues, we have identified three priority areas of impact.

## THE RIGHTS OF OUR COLLEAGUES

At Euro Packaging, we all have a responsibility, individually and collectively to maintain a work environment that reflects respect and dignity. We implement our commitments through our Employee Handbook which includes provisions on human rights issues such as:

- Non-discrimination and harassment,
- Promoting equality and value the diversity that colleagues bring,
- Ensuring a safe working environment,
- No child labour and no forced labour,
- Enabling colleagues to have a voice through our grievance procedure.

We proactively conduct random informal employee interviews on sampled staff and analyse grievance trends in order to measure our human rights impact on our own workforce.

If any employee believes that someone is violating the Human Rights Policy or the law, they are asked to report it immediately to their line manager or Human Resources at [humanrights@epuk.co](mailto:humanrights@epuk.co) or anonymously via the Human Rights suggestion box in their area, without any fear of retaliation.

---

<sup>1</sup> Consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights.

# Human Rights Policy



## THE RIGHTS AND EMPOWERMENT OF TEMPORARY WORKFORCE

At Euro Packaging, we recognise that it is our responsibility as a business using temporary workers via labour agencies to ensure their rights are respected and their voice is heard. We implement our commitments through our Temporary Workforce Agency Procedure which includes provisions on regular documented employment, right to work, payment and payslip access, multi-lingual information/awareness leaflets and due diligence checks in line with the Modern Slavery Act.

We proactively conduct informal temporary worker interviews to identify and measure our human rights impacts as well as to empower workers to voice their concerns via the relevant channels. At the same time, we conduct regular audits on the agencies supplying us the temporary workforce to identify and bridge gaps in processes and/or perceptions.

If any temporary worker believes that someone is violating the Human Rights Policy or the law, they are asked to report it immediately to their line manager, to the agency or Human Resources at [humanrights@epuk.co](mailto:humanrights@epuk.co) or anonymously via the Human Rights suggestion box in their area, without any fear of retaliation.

## WORKING CONDITIONS IN OUR SUPPLY CHAIN

We are fully aware of the potential for labour and human rights abuses to occur in supply chains, as well as the opportunity to use our commercial leverage to drive change and positive impact on human rights. We recognise that it is our responsibility as a business to respect and enhance the rights of people in the supply chain, by seeking to build our business partners' capacity to respect human rights through ongoing guidance and engagement.

We implement our commitments through our Supplier Code of Practice covering the right to healthy and safe working conditions and prohibiting forced labour, child labour and human trafficking. Upholding the Code of Practice is one of the requirements for our suppliers of doing business with Euro Packaging. We further assess and measure our human rights impact on our supply chain via regular ethical audits, Modern Slavery training and toolkits and expert guidance offered on a continuous as well as ad-hoc basis to our business partners.

## Governance and implementation

While human rights are the responsibility of all of us at Euro Packaging, implementing this policy rests with our Director of Operations and IT supported by HR. Our company programmes, policies and practices relating to human rights issues and impacts are reviewed and evaluated through this channel.

We are committed to conducting ongoing human rights due diligence and to engage with our key stakeholders around the world to continue to improve our approach. If human rights issues are identified, we will seek to both remedy them and understand the root causes of these abuses. We will develop and implement training on this policy for key Euro Packaging employees and business partners.

Signed by

A handwritten signature in blue ink, appearing to read 'Paul Timmins', written over a horizontal line.

Date 22/02/2023

Paul Timmins, Director of Operations & IT and Responsible for implementing the Human Rights Policy