



MODERN SLAVERY STATEMENT

FISCAL YEAR 2021

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR PLASTRIBUTION LIMITED FOR THE FISCAL YEAR ENDING 31 MARCH 2022

Plastribution Limited's ("PLB") Slavery and Human Trafficking Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 "Transparency in Supply Chains". This Statement sets out the steps PLB has taken to address the risk of slavery and human trafficking taking place with the operations and supply chains of PLB.

STRUCTURE AND SUPPLY CHAIN

PLB is a wholly owned subsidiary of ITOCHU Europe PLC. PLB is a Group of divisional business units:

SECTOR	BUSINESS UNIT	DESCRIPTION
Polymer Sector	PLASTRIBUTION	The distribution of thermoplastic raw materials for injection moulding, extrusion, and blow moulding industries.
	PLASCOATINGS	The distribution of curing and crosslinking agents to civil, automotive, and domestic sectors.
	ELASTRIBUTION	The distribution of elastomers for rubber product processing and related industries.
Product Sector	PLASFILMS	The distribution of films and provider of supply chain services predominantly for the labelling and packaging industries.
	PLASFOILS	The distribution of PVC and PET foils for doors and panelling systems.
Agency	APLAS	Agency specialising in managing customer relationships, referrals, and intermediary functions for major polymer suppliers.

For the purposes of this statement, all business units of Plastribution Group are treated as part of the same supply chain. Hereinafter, PLB shall refer to the whole Plastribution Group.

PLB is headquartered in Ashby-de-la-Zouch, United Kingdom. At present, PLB consists of 86 salaried employees.

PLB has a network of suppliers that ranges from large, multi-national suppliers to small to medium businesses globally. PLB recognises and undertakes its responsibility to ensure proper due diligence before trading with business partners but also ongoing due diligence throughout the relationship.

POLICIES

PLB has coherent policies that are explicit about slavery and human trafficking. These policies are applicable to all personnel and organisations associated PLB.

Staff Handbook

The Staff Handbook is applicable to all members of staff within PLB – the publication covers key topics surrounding corporate governance, compliance, equal opportunities and expected conduct within the workplace.

It is a pre-requisite that all employees adhere to the Staff Handbook. The Staff Handbook is freely available to all members of staff through the PLB intranet and shared drive. In fiscal year 2022, the Staff Handbook will be updated and published accordingly.

Corporate Compliance Policy

The Corporate Compliance Policy is considered the foundation to PLB's business practices – it communicates PLB's commitment to *Sampo-Yoshi*; that is to ensure PLB acts in the interests of all by trading in a socially responsible, ethical

way. It covers a range of important topics – however – for the purpose of this statement it outlines PLB’s commitment to ethical trading in line with ETI Base Code and the UN’s Guiding Principles on Human Rights.

Ethical Trading Policy

The Ethical Trading Policy details the training, due diligence, and principles that all associated persons and organisations are required to adhere to. This follows the principles held within the ETI Base Code and UN Guiding Principles on Human Rights.

Recruitment

PLB conducts ‘right to work’ checks on all potential employees prior to their start date. This includes checking their age and, where applicable, their visa status.

Reporting

PLB operates a dual reporting system for compliance breaches. Employees can contact the PLB Compliance Officer directly at any point to highlight a potential compliance breach – this includes potential human trafficking and slavery.

Alternatively, employees have access to a confidential, external, hotline provided by ITOCHU Corporation that will allow for anonymity of the reporter and external remedy. Details of the ITOCHU Compliance Hotline are contained within the Corporate Compliance Policy.

In fiscal year 2021 – PLB has had no report of compliance breaches via either reporting routes. In the event of a report, PLB and ITOCHU have robust procedures to address the issue and protect victims.

TRAINING

All PLB employees are required to conduct quarterly mandatory training in compliance and health and safety topics. Within the training programme, staff conduct training on risks surrounding human trafficking and slavery. This training is re-enforced through regular Business Updates conducted by the Managing Director and Compliance Updates from the Compliance Officer.

RISK OF HUMAN TRAFFICKING AND SLAVERY WITHIN THE SUPPLY CHAIN

Based on a current assessment, the risk of slavery and human trafficking with PLB is low. PLB employs personnel on standard contracted terms that incorporate current employment legislative requirements to ensure rights are protected.

PLB has a global network of suppliers of goods and services from approximately 480 suppliers, based in 35 countries. PLB operates predominately within Europe – however, PLB also sources from Asia, the Middle East, and the Americas.

PLB uses indicators to assess the ethical risk of a supplier:

- Corruption Perception Index;
- Freedom House Status
- QMS

In preparation for fiscal year 2022, PLB will implement a new supplier and customer onboarding process that will directly challenge the ethical nature of their business practices through self-audit, Compliance Officer sign off and increased frequency of visits.

A focus will be on new suppliers and customers but also high-risk suppliers that have been identified via the indicators above.

CONTINUOUS IMPROVEMENT

PLB will continue to place ethical trading and social responsibility as its foundation to business – PLB’s policies provide an effective measure to prevent slavery and human trafficking, however, PLB recognises that its mitigating measures must continue to evolve.

Holistic due diligence will be conducted in fiscal year 2022 to ensure risks are identified. The reviewed Corporate Compliance Policy will be communicated and published accordingly – this will be re-enforced through mandatory training for all staff.

APPROVAL

This statement has been reviewed by the Board of Directors of Plastrubution Limited and is approved on behalf of the Board by the Managing Director.

A handwritten signature in black ink, appearing to read 'Mike Boswell', with a long, sweeping underline that extends to the right.

Mike Boswell
Managing Director

01 April 2022