



Group Legal Policy

Anti-Slavery and Human Trafficking Policy

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Anti-Slavery and Human Trafficking Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another person in order to exploit them for personal or commercial gain.

Slavery, servitude and forced labour are to be interpreted in accordance with Article 4 of the Human Rights Convention.

Slavery takes place where an individual has a legal right to own another person as they do with property.

Servitude is similar to slavery and may include instances where an individual might live on a person's premises, work for them yet be unable to or be prevented to leave.

Forced labour may take the form of an individual being forced to do work that they have not agreed to, under the threat of punishment.

DS Smith has a **zero-tolerance approach** to modern slavery both within the Group and within its supply chain. DS Smith respects fundamental human rights and is committed to the principles set out in the United Nations Universal Declaration of Human Rights. We support and respect the protection of human rights within our sphere of influence; in particular the effective elimination of compulsory labour and child labour. We expect the same high standards from all of our contractors, suppliers and other business partners.

As a Group, DS Smith maintains relationships with many different organisations in its supply chain, as well as directly employing large numbers of people. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Our Anti-Slavery and Human Trafficking Policy governs our approach to modern slavery in our own and in our supplier's businesses. It underpins our approach, and is used to inform our annual statement on slavery and human trafficking. It is also designed to sit alongside our '[Speak Up!](#)' [Policy](#), [Code of Conduct](#), [Global Supplier Standards](#) and [Human Rights Policy](#).

Miles Roberts
Group Chief Executive
December 2021



1. Scope

- 1.1 This document sets out the policy of DS Smith Group (“**DS Smith**”) with the aim of preventing modern slavery within our business and supply chain. Whilst this policy is based on the concept of ‘modern slavery’ as defined in the UK Modern Slavery Act 2015, this policy relates to the prevention of anti-slavery and human trafficking across DS Smith and includes other equivalent legislations.
- 1.2 It applies to all DS Smith operations and employees. This policy governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf. DS Smith expects equivalent standards of conduct from all persons acting on its behalf, such as suppliers, agents and business partners.

2. Steps for the Prevention of Modern Slavery

- 2.1 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains which are consistent with our disclosure obligations under the UK Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and continually evolve and update our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.
- 2.2 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we have implemented the following measures and will continue to review and update them:
 - a) **conduct risk assessments**, risk profiling and rating processes with internal stakeholders and DS Smith’s Risk Function to identify which parts and regions of our business and which of our suppliers are most vulnerable to modern slavery so that efforts can be prioritised on those areas;
 - b) **engage with our suppliers through our Global Supplier Standards**, which standardises our supplier compliance related documents into one document, and outlines the minimum requirements and standards that we expect from them regarding ethical business practices, social and environmental management and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses and their supply chain;
 - c) introduced **supplier pre-screening** and the One Procurement Function (centralised



procurement function) to standardise on-boarding (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;

- d) introduced **contractual provisions** for our suppliers to confirm their compliance with the UK Modern Slavery Act 2015 or their equivalent legislations and give DS Smith a right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion to ensure full compliance with applicable anti-slavery and human trafficking laws;
- e) introduced a **self-assessment questionnaire and ethical audits** into our manufacturing sites to assess local knowledge and implementation of our policies and to track and report any non-conformance; and
- f) maintain a **mandatory modern slavery e-learning course** for employees and other workers. This training is required on joining the business and is refreshed every 2 years. Employees and workers have to pass a test as part of the training.

3. Actions for Reporting Modern Slavery or Human Trafficking

- 3.1 We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.
- 3.2 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- 3.3 DS Smith will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Internal

- 3.4 The '**Speak Up!**' Policy provides guidance on how employee concerns, such as those relating to modern slavery, can be communicated on a confidential basis and without fear of retaliation.

Employees are encouraged to raise any concerns about suspected modern slavery associated with DS Smith or our suppliers and should do this either through their line manager or by using the alternative 'Speak Up!' channels (details of which can be found on [Plexus](#)). Suspected



incidents may be reported by raising with local HR, e-mail to AskCoSec@dssmith.com, postal service, web or telephone via the independent 'Speak Up!' hotline. Any reports received through 'Speak Up!' are considered by the Audit Committee as part of their regular reviews of internal controls.

- 3.5 All matters will be dealt with in confidence, protecting the legitimate personal interests of employees and workers, and other applicable laws in the jurisdictions where DS Smith operates.

External

- 3.6 Members of the public or people not employed by DS Smith are encouraged to write, in confidence, to the Group General Counsel and Company Secretary (either via e-mail: AskCoSec@dssmith.com or to the registered office) to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

4. Responsibility for this Policy

- 4.1 The Modern Slavery Committee was established in 2016 and is made up of a multi-disciplinary team from different departments within DS Smith and is chaired by the Group General Counsel and Company Secretary. The Modern Slavery Committee reports to our Group Operating Committee, chaired by the Group's Chief Executive Officer. The Group Operating Committee reports to the Audit Committee. The Modern Slavery Committee meets on a quarterly basis and provides a forum for representatives across the business to input on the Group's policies and procedures relating to modern slavery, discussing areas of potential risk, mapping out improvements to be made to prevent instances of modern slavery occurring and embed the ethos of preventing modern slavery.
- 4.2 DS Smith has also established a Modern Slavery sub-committee to consider risks across the business that relate to the prevention of modern slavery on a more practical basis.
- 4.3 Ultimate responsibility for the prevention of modern slavery rests with DS Smith's leadership. The Board of Directors of DS Smith Plc has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.
- 4.4 Managers at all levels are responsible for ensuring those reporting to them:
- understand and comply with this policy; and
 - are provided with adequate and regular training on the issue of modern slavery in the context of their specific roles.



- 4.5 All employees, workers and agents must read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or on our behalf. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.6 You must notify your manager or report this through the alternative 'Speak Up!' channels as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

5. Communication and Awareness of this Policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. Breach of this Policy

- 6.1 If an issue is identified with a supplier we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period.
- 6.2 We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

7. Key Related Documents

Ref Number	Title
	'Speak Up!' Policy
	Code of Conduct
	Global Supplier Standards



8. Document Change Record

Version:	Date:	Change Description:	Author:	Approver:
v.2	December 2021	Updates to policy statement, 'Speak Up!' Policy details, key examples, steps for prevention and responsibility of policy.	Nazia Cassamali	Iain Simm