



MODERN SLAVERY POLICY STATEMENT

The Reflex Group is totally committed to driving out the acts of modern day slavery and human trafficking from within its own business and supply chains. The company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

The organisational structure of the business consists of a private company owned by two Directors and is made up of several sites supplying labels, flexible packaging, packaging solutions in addition to labelling systems and label application machinery. Within the supply of these there are relationships with external businesses for the sourcing of raw materials. These as well as the suppliers of services make up the supply chains within Reflex Labels Ltd. Imported goods from sources outside of the UK and EU are potentially more at risk for slavery/ human trafficking issues. The level of management control required for these sources will be continually monitored. As well as being members of SEDEX, Reflex also have an Ethical Trading Policy that addresses the base code of ETI.

The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company Directors and senior management shall take responsibility for implementing the policy statement and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains. This includes training managers on illegal and forced working awareness and prevention. All new employees are to personally provide proof of Right to Work in the UK, where a copy is taken and original documentation returned, all are paid into their own bank account and are individually responsible for their travel to work and home accommodation independent to Reflex.

A full copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request.

This policy statement will be reviewed annually and published.

Signed on behalf of Reflex Labels Ltd.

I. Kendall

Managing Director

P. Pollard

Employee Relations & Business Compliance

Last Reviewed: January 2017

Next Review: January 2018