



FIRST CIRCLE PACKAGING LIMITED **SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out steps that First Circle Packaging Ltd have taken reasonable steps to ensure that slavery and human trafficking is not taking place in any of its supply chains or part of our business.

Our business

We are a UK manufacturer of HDPE & PET plastic rigid containers supplying to the dairy and non-dairy markets, including homecare, industrial, automotive, household and personal care. The business has multiple sites across the UK and Ireland, including its head office based in Milton Keynes.

Our supply chains

Our supply chain consists of sourcing raw material from approved food grade suppliers and the distribution of our bottles across the UK and Ireland. Due diligence processes for slavery and human trafficking remain in place to ensure its suppliers confirm their compliance with the Act. As part of our initiative to identify and mitigate risk:

- First Circle prides itself on building long term relationships with its suppliers both locally and nationally
- Our values are based around integrity, safety and transparency
- We have systems in place to encourage the reporting of issues or concerns and if necessary, the protection for whistleblowers

Age UK endeavours to raise awareness among all employees of the identification, prevention and eradication of modern slavery and human trafficking, and has policies and procedures in place to ensure that they can do so. The Age UK Procurement function operates across Age UK's subsidiaries, and has oversight of our supply chain. The relevant policies are

Relevant policies

The organisation is committed to ensuring that there is no modern slavery and human trafficking within our supply chains or within our business. Our commitment to integrity and acting ethically in all our business dealings to minimise the risk of modern slavery in our supply chain. First Circle has a number of policies in place:

- Code of Ethics Policy
- Recruitment Policy
- Purchasing Policy and Procedure
- Whistleblowing Policy



Our Code of Conduct sets out the behaviours we expect from employees in their dealings with colleagues, customers, suppliers and agents. All employees and suppliers are expected to act with integrity in accordance with the standards of behaviour set out in the Code of Conduct.

We encourage employees to raise concerns and issues via the Company's grievance Procedure or Whistleblowing Policy. We are committed towards creating a working environment where everyone is treated with dignity and respect and providing equal opportunities for all our colleagues.

We actively encourage and support employee engagement. The Grievance Procedure ensures employees have the opportunity to raise concerns or grievances.

Training

All Directors and Senior Managers have been briefed on the subject and the organisation has a high level of understanding of the risk and issues of modern slavery and human trafficking within our business and supply chains. First Circle provides training to our people to increase awareness and address any risks.

The Company undertake all reasonable and practical steps to monitor and review, to ensure its suppliers meet our standards and comply with local legislation. This statement has been approved by our Board of Directors, who will review it on an annual basis

Progress in 2023/2024

In the 2023/24 financial year First Circle has taken numerous steps to ensure its supply chain comply with the Act;

- Review existing clauses in supplier agreements
- Monitor any new suppliers prior to engaging with them
- The introduction of a wellbeing strategy and various initiatives to support our people's physical and mental wellbeing.

Plans for 2024/2025

During 2024/25 financial year First Circle plans to take further steps to improving our people's knowledge and widening it's awareness through further training.

Updated October 2024