

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 in order to exploit them for personal or commercial gain.

Zenith Print and Packaging Ltd (The Company) has a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all business dealings and relationships as well as implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of the Company's supply chains.

The Company are also committed to ensuring there is transparency in their own business and in their approach to tackling modern slavery throughout their supply chains, consistent with their disclosure obligations under the Modern Slavery Act 2015. The Company expect the same high standards from all of their contractors, suppliers and other business partners, and as part of their contracting processes, the Company include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expect that their suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for the Company or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and the Company may amend it at any time.

Responsibility for the Policy

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under the Company's control comply with it. The Site Director(s) have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Quality Manager.

Compliance with the Policy

Employees must ensure that they 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 the Company or under the Company's control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must inform their Line Manager or site Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Company's business or supply chains of any supplier tier at the earliest possible stage.

If employees believe or suspect a breach of this policy has occurred or that it may occur they must notify their Line Manager or report it in accordance with the Company's Whistle-blowing Policy as soon as possible. Employees should note that where appropriate, and with the welfare and safety of local workers as a priority, the Company may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

If employees are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within the Company's supply chains constitutes any of the various forms of modern slavery, it should be raised with their Line Manager or Site Director.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company 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.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If employees believe that they have suffered any such treatment, they should inform their Line Manager immediately. If the matter is not remedied, employees should raise it formally using Grievance Policy, which can be found within the Employee Handbook.

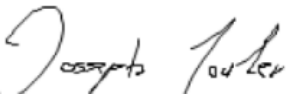
Communication and Awareness of the Policy

Training on this policy and on the risk the Company faces from modern slavery in its supply chains, forms part of the induction process and regular briefings will be provided, as necessary. The Company's zero-tolerance approach to modern slavery within its business and supply chains is communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. The Company may terminate their relationship with other individuals and Company's working on the Company's behalf if they breach this policy.

Senior Management will monitor and review compliance to this policy and related procedures.

Approved By:  Joseph Towler, CEO

Date: 22nd April 2024