

Modern Slavery Statement

Introduction

Daklapack is committed to preventing modern slavery and human trafficking in our business and supply chains. We recognize our responsibility to operate ethically and transparently and ensure that modern slavery is not taking place within our operations or those of our suppliers.

Organizational Structure and Supply Chains

Daklapack is a packaging supplier operating in multiple countries, including the Netherlands, France, Germany, the UK, USA, South Africa and China. Our supply chains span multiple jurisdictions, and include suppliers of raw materials, manufacturing partners, and logistics providers. We work closely with our stakeholders to ensure compliance with ethical labor practices.

Policies on Modern Slavery

At DaklaPack, we continuously strive to become more sustainable and socially responsible through both our products and business practices. We see our position in the packaging supply chains as a valuable opportunity to innovate and work collaboratively to create positive, sustainable change wherever we manufacture or market our products. We also expect all suppliers and service providers to the DaklaPack Group to be active partners in this sustainability journey.

Our Code of Responsible Conduct (CoRC) outlines our zero-tolerance approach to forced labor, child labor, human trafficking, and exploitation. This policy is integrated into our company's code of conduct and supplier agreements to reinforce our commitment. Our CoRC is based on internationally recognized standards of sustainable and responsible business practices, primarily the UN Declaration of Human Rights, the UN Global Compact, and the UN International Labor Organizations (ILO) Labor Standards. It is in line with the UK Modern Slavery Act 2015 and other relevant legislation.

Due Diligence Processes

To prevent modern slavery in our business and supply chain, we have established the following due diligence measures:

- Risk assessments to identify areas of our own operations and supply chain vulnerable to modern slavery.
- Contractual obligations for suppliers to adhere to our policies.
- Periodic monitoring and review of our supply chain partners.
- An internal whistleblowing mechanisms to allow reporting of unethical practices.

Risk Assessment and Management

We assess risks associated with our operations and supply chains through periodic evaluations and engagement with best-practice resources. Suppliers or the environment they operate in, are given a certain risk profile on perceived or known social risks (a.o.). High-risk suppliers undergo more frequent and enhanced scrutiny, including third-party audits where legally required. Our Quality Assurance team, supported by our Sustainability and Supply Chain teams, works to continuously improve our supply chain mapping and risk identification processes.

Training and Awareness

To ensure our employees and suppliers understand the risks of modern slavery, we provide explainers and training based on their roles. Our zero-tolerance approach is known and shared with all DaklaPack Group employees. Our CoRC outlines what we expect from our suppliers. Additionally, employees who are in direct contact with potential high-risk suppliers or employment agencies receive training covering such topics as:

- Identifying signs of modern slavery and human trafficking.
- Reporting mechanisms and escalation procedures.
- Legal and regulatory requirements.

Measuring Effectiveness

We evaluate the effectiveness of our actions to combat modern slavery through the following recurring actions:

- Annual reviews of our policies and practices.
- Tracking and investigating reported concerns.
- Compliance verification within legal requirements.
- Continuous improvement initiatives based on findings from risk assessments.

Approval and Sign-Off

This statement has been approved by DaklaPack's Board of Directors and is reviewed annually, within 6 months of DaklaPack's financial year-end (Dec 31st).

Signed on 13-4-20 by:

Dave Klaasen
CEO



Jelle Jeths
COO

