



MODERN SLAVERY STATEMENT

The Modern Slavery Act 2015 requires large UK businesses to publish a statement describing the activities they are undertaking to prevent slavery and human trafficking in their own business operations and supply chain.

This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out the approach taken by *Verallia UK Limited* to understand all potential modern slavery risks related to its business and the actions undertaken to mitigate any such risks during the financial year ended **31st December 2025**.

Our Business

Verallia UK Limited is a premium glass bottle manufacturer who design, develop, manufacture and decorate luxury glass packaging. We have 590+ employees across 4 sites within West Yorkshire.

We are part of the Verallia Group, who with 34 glass production plants, 5 decor plants and 12 cullet (glassware) processing centres in 12 countries, are the European leader and the world's third largest producer of glass packaging for beverages and food products.

Group Code of Ethics

At Verallia we believe that respect for our values drives our business model and our stakeholders' trust in us.

We undertake to promote sustainable, profitable growth that is respectful of the environment and our employees, partners, customers, suppliers, shareholders and investors. To that end, we ask all our employees to embody our ethical principles on a daily basis and thus make Verallia an exemplary company.

Our Group Code of Ethics, which can be found on the Group website, aims to guide us on this path. It sets out our commitments and the behaviour we expect from all our employees. The rules it lays down apply to all of us, irrespective of our positions, across all levels of the Company.

Verallia's Human Rights Charter

Verallia's Human Rights Charter is based on its Code of Ethics applicable to all Group employees and shared with all its stakeholders, including subcontractors, suppliers and customers.

This position is intended to govern the Group's relations with all its stakeholders and in particular its employees, suppliers and subcontractors, customers and other business partners, as well as its private and public contracts in the territories in which it operates.

Verallia is committed to respecting and promoting human rights in all its activities, on all its sites and in all the relationships it maintains with its stakeholders, in accordance with international standards such as:-

- the Universal Declaration of Human Rights



- the UN Guiding Principles on Business and Human Rights
- ILO conventions
- the OECD guidelines for multinational enterprises
- the United Nations Global Compact

These commitments are integrated into the Group's policies, in particular the HR policy and the responsible purchasing policy.

The Group applies a vigilance approach based on the identification, assessment and management of human rights risks. It ensures that local laws are respected while adopting the most protective international standards. Constant dialogue with stakeholders is encouraged to ensure continuous improvement.

Our Suppliers

Our manufacturing process includes significant volumes of materials and services, including energy, raw materials, moulds, consumables, packaging and logistics. As such we have a number of preferred suppliers for these materials and services, all of whom are expected to have noted our requirements under the Verallia Supplier Charter and have established similar arrangements in regard to our commitment to uphold ethical standards.

Verallia UK Limited applies the principles of honesty, integrity and fairness to its entire supplier panel and is committed to selecting its suppliers based on bidding processes that reflect real competition. Our Purchasing team use objective selection criteria (technical, quality, cost, service, social and environmental).

Suppliers that do not meet our ethical expectations will be excluded from the supplier panel.

Risk Management

Our Purchasing Department uses the Group supply chain risk management process to identify, anticipate, manage and mitigate risks. This process is aimed at selecting suppliers that are in line with *Verallia UK Limited's* principles and fully engaging them in our corporate social responsibility (CSR) approach.

CSR criteria is included in purchasing procedures relating to call for tender in order to take into account the CSR approach taken by suppliers in the selection process. CSR clauses are also included in the contracts signed with suppliers.

In addition, *Verallia UK Limited* expects its suppliers to undergo CSR assessments, to participate in external audit campaigns and to be part of a continuous improvement process by implementing action plans.

Creditsafe Compliance Screening is used to protect our business by providing in depth knowledge of our existing and future customers, suppliers and partners. This compliance screening generates reports on any instances of adverse publicity, sanctions or prosecutions the business has had, including modern slavery issues, thus enabling a full risk diagnosis of all third parties.



Our Policies

Alongside the *Verallia Code of Ethics and Human Rights Charter*, which clearly set out our commitment to ethical practice that we expect all our employees and suppliers to work towards, *Verallia UK Limited* operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:-

- Recruitment Policy – we operate a robust Recruitment Policy, including conducting eligibility to work in the UK checks for all new employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Policy – we operate a Whistleblowing Policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business, or supply chain, without fear of reprisals.
- Health & Safety Policy – our Health and Safety Policy outlines *Verallia UK Limited's* commitment to maintaining a safe and healthy working environment and establishes the framework for managing risks and assigning responsibilities.

Verallia UK Limited policies will be continually reviewed and improved upon in light of any legislative changes and/or needs of the business.

Progress for the Financial Year Ending 31st December 2025

- During the last financial year the Verallia Group successfully introduced the confidential whistleblowing portal. The portal enables employees to report their concerns in good faith. All information provided via the portal is handled with complete confidentiality and if chosen by the individual, on an anonymous basis.
- Modern slavery awareness instruction has been introduced to the Induction process for all new joiners to the Company, with instructions on how to spot and/or report any concerns regarding modern slavery.
- A Modern Slavery Awareness Training programme for employees, Supervisors and Managers has been created, to provide awareness of the risk of modern slavery both within our business and supply chains.

Improvement Plans

As a Company who are committed to preventing slavery and human trafficking in our corporate activities, we will continue to develop our response in understanding and supporting the aims and requirements of the Modern Slavery Act.

To help identify, prevent and mitigate any incidents of modern slavery in our operations and supply chain, we will continue to review our processes and practices to ensure that we identify and manage risks to ensure our ongoing compliance with the Modern Slavery Act.

One of the key steps we will be focusing on in the financial year to 31st December 2026 will be the implementation of the new Modern Slavery Awareness Training programme to employees, Supervisors and Managers.

Performance Indicators

We currently know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:-

- No incidents of modern slavery are identified during ethical/compliance audits.
- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

This statement is approved by the Board and is signed on its behalf by **Mr Axel Guilloteau, Managing Director.**



MR AXEL GUILLOTEAU
Managing Director