Modern Slavery and Human Trafficking Statement

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015. It outlines the steps taken by Wm Croxson & Son, Limited (Croxsons) to identify, assess, and mitigate the risk of modern slavery and human trafficking within our business and supply chain for the year ending 31 December 2025.

We recognise that modern slavery risks can arise in global supply chains. Our approach is to manage these risks through practical, risk-based controls embedded within our operational processes. When we refer to "modern slavery", we include all forms of forced labour, human trafficking, and child labour.

Our Organisation and Supply Chain

We're a family-owned business, and have been for over 150 years. Today, Croxsons is a global leader specialising in the design and supply of packaging for food and beverage brands. As of 31 December 2025, we operated across four key regions, supplied into more than 50 countries, and employed a team of 27 dedicated people.

Our supply chain includes manufacturers, logistics providers, decoration services, and supporting partners. We operate globally, working directly with our manufacturers to ensure we have a clear line of sight into ethical sourcing, right from origin.

Our Commitment to Human Rights & Our Key Policies

We are deeply committed to ensuring that modern slavery has no place in our business or our supply chain.

Within our own operations, this is supported by established HR processes, including formal employment checks, right-to-work verification, and clear terms and conditions of employment.

We manage modern slavery risk through a structured, risk-based supplier approval and monitoring process embedded within our Quality Management System.

All suppliers must complete a structured supplier questionnaire as a minimum requirement prior to approval. This forms the basis of our supplier assessment and risk classification process.

Suppliers are then reviewed regularly, with the level of scrutiny determined by risk. Our methodology aligns with HACCP principles, where risks are identified and controlled based on likelihood and impact.

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Unit 1, Brockbourne House, 77 Mount Ephraim, Tunbridge Wells, TN4 8BS. Registered Company No: 71941

Modern Slavery Risk Controls

We integrate modern slavery risk into our operations through:

- A structured supplier questionnaire, which forms the primary source of information used to assess supplier risk, including modern slavery considerations
- A mandatory Supplier Code of Conduct, which all suppliers are required to adhere to
- Risk-based assessment of supplier geography and sourcing model
- Ongoing monitoring through supplier review, performance tracking, and reassessment

Enhanced due diligence may include additional information requests, increased monitoring, or conditional approval depending on the level of risk identified.

Suppliers in higher-risk geographies or with limited supply chain visibility are subject to enhanced review. UK and EU suppliers are generally considered lower risk due to established regulatory frameworks.

Our Approach to Accountability

At Croxsons, doing the right thing isn't a box-ticking exercise — it's part of who we are. Our Ethics Policy, along with the supporting frameworks behind it, applies across all our teams, companies, joint ventures, and any third parties representing us globally.

We make sure every new team member understands their role in upholding these standards. From day one, they commit to reading, understanding, and following our Ethics Policy. We actively encourage our people to speak up — whether it's concerns around modern slavery, workplace issues, or ethical breaches. That can be to local leadership, or via a confidential whistleblowing channel.

Where standards are breached, we act decisively and in line with the law — that may include disciplinary action, up to and including dismissal. Our Board is ultimately accountable for upholding, reviewing, and embedding these policies across the business.

Our expectations don't stop at our door. Our Supplier Code of Conduct sets the bar for all partners — covering labour rights, health and safety, environmental impact, and ethical behaviour. If a supplier doesn't meet these expectations, we reserve the right to terminate or not renew contracts. Any breach involving child labour, unsafe or inhumane working conditions is considered a serious contract violation.

We also provide a route for third parties to raise concerns, particularly around human rights or modern slavery. These can be brought directly to Croxsons' Board of Directors.

Training

We don't just publish policies — we make sure people understand them. Every employee at Croxsons receives training on our ethics policies and how to raise concerns if something doesn't look or feel right.

Relevant members of staff complete regular training focused on identifying and responding to modern slavery, including how our policies apply in practice, how to spot red flags, and the steps to take if concerns arise.

We're not standing still either. We're continuously reviewing and expanding this training to make sure the right people across the business have the knowledge and confidence to uphold our standards.

Monitoring and Key Performance Indicators

We measure the effectiveness of our approach through a focused set of indicators:

- % of active suppliers that have completed the Supplier Questionnaire prior to approval

- % of suppliers classified as Low, Medium and High risk

- % of suppliers identified as higher risk due to geography or sourcing model

- Number of suppliers subject to enhanced due diligence or corrective action

Effectiveness and Continuous Improvement

In the period covered by this statement, we have not received any reports or identified any issues relating to modern slavery — either within our own operations or across our supplier network. We continue to refine our processes to ensure they remain effective and proportionate.

That said, our commitment to protecting human rights and ensuring safe, fair working conditions remains unwavering. We continue to monitor our practices closely and review our approach to combatting modern slavery and human trafficking annually — not just to remain compliant, but to lead responsibly.

This statement covers the year ending 31 December 2025 and has been approved by the Board of Directors.

Signed:	Tim Croxson
Review Date:	01/06/26
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