

## Modern Slavery and Human Trafficking Statement

This statement is made by Wm Croxson & Son, Limited in line with our obligations under section 54(1) of the UK Modern Slavery Act 2015. It outlines the steps we've taken to identify and tackle modern slavery in both our own operations and throughout our supply chain for the year ending 31 December 2024.

When we refer to “modern slavery”, we include all forms of forced labour, human trafficking, and child labour.

### Our Organisational Structure

We're a family-owned business, and have been for over 150 years. Today, Croxsons is a global leader in the design and supply of packaging for food and beverage brands. As of 31 December 2024, we operated across four key regions, supplied into more than 50 countries, and employed a team of 30 dedicated people.

### Our Supply Chain

Our core materials include glass containers, closures, decoration, consumables, and logistics services — most of which we source regionally. Our procurement approach is built on long-term relationships. Where possible, we work directly with our manufacturers to ensure we have 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. Two key documents underpin this:

1. Our Ethics Policy; and
2. Our Supplier Code of Conduct

#### Ethics Policy

This policy reflects our commitment to doing business with integrity. It affirms our stance on human rights, including fair employment, freedom of association, and collective bargaining. It also speaks to how we treat people across our value chain, encouraging everyone to take responsibility for upholding our standards.

We actively promote speaking up. Anyone at Croxsons can report concerns — confidentially if needed — whether to management or through our whistleblowing service.



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The Old Post Office, 19 Grove Road, Sutton, SM1 1BB

T: +44 208 337 2945 E: [hello@croxsons.com](mailto:hello@croxsons.com) W: [www.croxsons.com](http://www.croxsons.com)

Our Ethics Policy has been approved by our Board and is available to all employees through our internal portal and our website. Any updates to it go through Board approval.

### Supplier Code of Conduct

This policy sets out clear expectations for all our suppliers — covering human rights, labour practices, environmental care, and ethical behaviour. It's based on the Ethical Trading Initiative Base Code and makes it clear: non-compliance can lead to cancelled or non-renewed contracts.

Our logistics providers are also required to follow specific security procedures to mitigate risks such as trafficking or smuggling. And we provide a mechanism for third parties — including suppliers — to raise concerns anonymously if needed.

### **Our Approach to Supply Chain Verification & Risk**

We use a risk-based approach to identify where human rights or environmental issues might occur. Internally, we've assessed modern slavery risk as low, but we still take precautions — like age verification on new hires and ensuring employment contracts are in place.

Externally, our focus is on the supply chain — that's where we can have the greatest impact.

### Desktop risk assessment

Every year, we carry out internal desktop reviews of selected suppliers using a mix of factors: industry, location, and perceived risk. We pull in data from supplier questionnaires, independent indices, and online sources. We also may use SMETA audits as appropriate.

We reassess suppliers every 1 to 3 years depending on risk level. Outcomes and recommendations are shared with suppliers to help them strengthen their practices.

### On-site Audits

Where our desktop review flags a concern, we may require an on-site audit — carried out either by our team or a third party. These audits cover labour conditions, safety, and environmental matters, and may include site tours, document checks, and interviews.

We prioritise third-party audits for suppliers in higher-risk regions. In 2024, no audits were required based on our risk assessments.

### Additional mitigation measures

In cases where we're aware of elevated human rights risk, we may introduce further safeguards tailored to the situation.

### Certification

Our General Terms and Conditions of Purchase incorporate our Code of Conduct. All suppliers are contractually expected to meet these standards and confirm compliance during the onboarding process or as part of our supplier assessments.

## **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.

For our procurement and HR teams — who are often closest to risk — we go deeper. They 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.

## **Responsibility and Effectiveness**

In the period covered by this statement, we've not received any reports or identified any issues relating to modern slavery — either within our own operations or across our supplier network.

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 2024.

Signed: Tim Croxson

Date Review: 01/05/25

Version: 03