denmaur

PEOPLE | PAPER | PLANET

Denmaur Independent Papers: Modern Slavery Act Policy

Policy Owner: Sustainability Director

Approved by: Chief Executive Officer

Review Frequency: Annual

1. Policy Statement

Modern slavery is a crime and a serious violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour, debt bondage, child labour and human trafficking, all of which involve the exploitation of individuals through coercion, deception or abuse.

Denmaur adopts a zero-tolerance approach to modern slavery in all its forms. We are committed to acting ethically, with integrity and transparency in every aspect of our business and to implementing effective systems and controls to minimise the risk of modern slavery occurring within our own operations or anywhere throughout our supply chain.

We expect the same high standards from every organisation with whom we conduct business.

2. Our Commitment

Denmaur is committed to-

- compliance with the UK Modern Slavery Act 2015
- respecting internationally recognised human rights
- operating in accordance with the International Labour Organization (ILO) Core Conventions
- supporting the UN Guiding Principles on Business and Human Rights
- supporting the UN Global Compact Principles relating to human rights and labour

- ensuring employment is freely chosen
- prohibiting child labour, forced labour and human trafficking
- providing a safe, respectful and inclusive workplace
- promoting equality, dignity and fair treatment for all employees
- maintaining transparent and ethical business relationships

3. Scope

This policy applies to every person working for or on behalf of Denmaur, including: -

- Directors
- Employees
- Temporary workers
- Agency workers
- Contractors
- Consultants
- Suppliers
- Service providers
- Logistics partners
- Business partners

Every individual has a responsibility to uphold the principles contained within this policy.

4. Governance

The Board of Directors has overall responsibility for ensuring this policy complies with legal and ethical obligations.

Day-to-day responsibility for implementation rests with senior management, Human Resources, Procurement and Sustainability & Compliance.

Management will ensure appropriate resources are available to implement, monitor and continually improve this policy.

5. Employment Practices

Denmaur operates robust recruitment and employment procedures designed to prevent exploitation. We will: -

- verify every employee's legal right to work
- ensure employment is voluntary
- never retain passports or identity documents
- never require recruitment fees
- pay employees fairly and in accordance with applicable legislation
- comply with working time regulations
- provide safe and healthy working conditions
- respect freedom of association and collective bargaining

6. Responsible Procurement & Supply Chain

As a national paper and board merchant sourcing products from global manufacturers, we recognise that modern slavery risks may exist within extended supply chains.

Our supplier due diligence programme includes, where appropriate: -

- supplier approval procedures
- sustainability assessments
- country and sector risk evaluation
- verification of recognised certifications
- review of labour and human rights policies
- supplier declarations
- ongoing supplier monitoring
- periodic reassessment of higher-risk suppliers

Preference is given to suppliers able to demonstrate recognised responsible business practices, including EUDR compliance, FSC®, PEFC, ISO management systems, EcoVadis assessments, Science Based Targets and publicly available sustainability commitments.

Where concerns are identified, Denmaur will investigate promptly and may require corrective actions, suspend purchasing activities or terminate commercial relationships where satisfactory improvements are not achieved.

7. Risk Assessment

Modern slavery risk is considered as part of Denmaur's wider supplier due diligence and sustainability programme. Risk assessments may consider: -

- country of operation
- sourcing practices
- labour-intensive activities
- supplier transparency
- recognised certifications
- previous audit findings
- publicly available ESG information

Higher-risk suppliers may be subject to enhanced due diligence.

8. Training & Awareness

Employees involved in recruitment, procurement, supplier management and operational activities receive appropriate awareness of

- recognising indicators of modern slavery
- responsible procurement
- supplier due diligence
- reporting procedures
- ethical decision making

Modern slavery awareness forms part of Denmaur's wider sustainability and compliance programme.

9. Reporting Concerns

Every employee has a responsibility to report any concerns regarding actual or suspected modern slavery. Concerns may relate to: -

- suppliers
- contractors
- recruitment agencies

- logistics providers
- customers
- internal operations

All concerns should be reported to (WHO). The individual should provide as much relevant information as they reasonably can, including the nature of the concern, relevant dates, individuals or activities involved and any supporting information or evidence available.

Reports will be investigated promptly, confidentially and without fear of retaliation.

No employee will suffer detriment for raising a genuine concern in good faith.

10. Monitoring & Continuous Improvement

Denmaur continually reviews the effectiveness of this policy through: -

- supplier sustainability assessments
- internal audits
- management reviews
- FSC® and PEFC external audits
- ISO 9001 and ISO 14001 external audits
- BRCGS audits where applicable
- corrective action monitoring
- annual policy review

Performance indicators may include: -

- supplier due diligence completion
- supplier sustainability coverage
- employee training completion
- reported concerns
- corrective actions completed

11. Related Policies

This policy should be read alongside: -

- Core Labour Policy
- Procurement Policy
- Supplier Code of Conduct
- Environmental Policy
- Equality, Diversity & Inclusion Policy
- Health & Safety Policy
- Whistleblowing Policy
- Anti-Bribery & Corruption Policy

12. Review

This policy will be reviewed annually and updated whenever legislative, operational or supply chain changes require.



Andy Buxton
CEO
June 2026