



# Modern Slavery Statement

1 May 2021 - 30 April 2022





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## 1. Introduction

DS Smith Plc (together with our subsidiaries and affiliates) ("DS Smith" or the "Group" or "we") is a leading multi-national provider of sustainable corrugated packaging in Europe and the United States of America (USA), supported by paper and recycling operations.

Modern slavery is one of the most complex and important human rights challenges of our times. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking, all of which have in common the deprivation of a person's liberty by another person in order to exploit them for personal or commercial gain.

Slavery, servitude and forced labour interpreted in accordance with Article 4 of the Human Rights Convention are as follows:

**Slavery takes place where an individual has a legal right to own another person as they do with property.**

**Servitude is similar to slavery and may include instances where an individual might live on a person's premises, work for them yet be unable to leave or be prevented from leaving.**

**Forced labour may take the form of an individual being forced to do work that they have not agreed to, under the threat of punishment.**

As a Group, we have a zero-tolerance approach to modern slavery. DS Smith has identified that much of the modern slavery risk it faces sits within its supply chain and associated processes and accordingly we have focused much of our efforts in this area.

In this statement, we set out the processes we have established across the Group, together with the steps taken since our last modern slavery statement for the year ended 30 April 2021, to ensure that human rights violations, including modern slavery and human trafficking are not occurring within our operations or our supply chain and summarise some of the steps we plan to take during the year ending 30 April 2023.

We have established new policies and procedures on human rights, combining it with the work we are doing on modern slavery and integrating these into the business to ensure that it continues to have a prominent place in our values, goals and processes.

We are pleased to report that for the year ended 30 April 2022, no instances of modern slavery were identified within our business. We had a report of a suspected instance with one of our suppliers which was thoroughly investigated (more details can be found under Section 9).

## 2. Our Business

Today, DS Smith operates in more than 30 countries, employing approximately 29,000 people, with our Total Marketing Support (“TMS”) business covering an additional 18 countries employing c.270 office-based employees. We serve customers across a range of industries including e-commerce, fast-moving consumer goods (“FMCG”), pharmaceutical, retail and industrials. With manufacturing operations across Europe and the USA and sourcing, consultancy and sales and marketing presence across six continents, we are able to provide products and services to our customers both on a local and global level.

For the year ended 30 April 2022 our revenue was £7,241 million. At DS Smith we are fully committed to complying with the principles of good corporate governance and understand the importance of being trusted by our stakeholders, suppliers and customers to operate in an ethical manner and following the highest standards. DS Smith continues to comply with the U.K. Corporate Governance Code 2018.

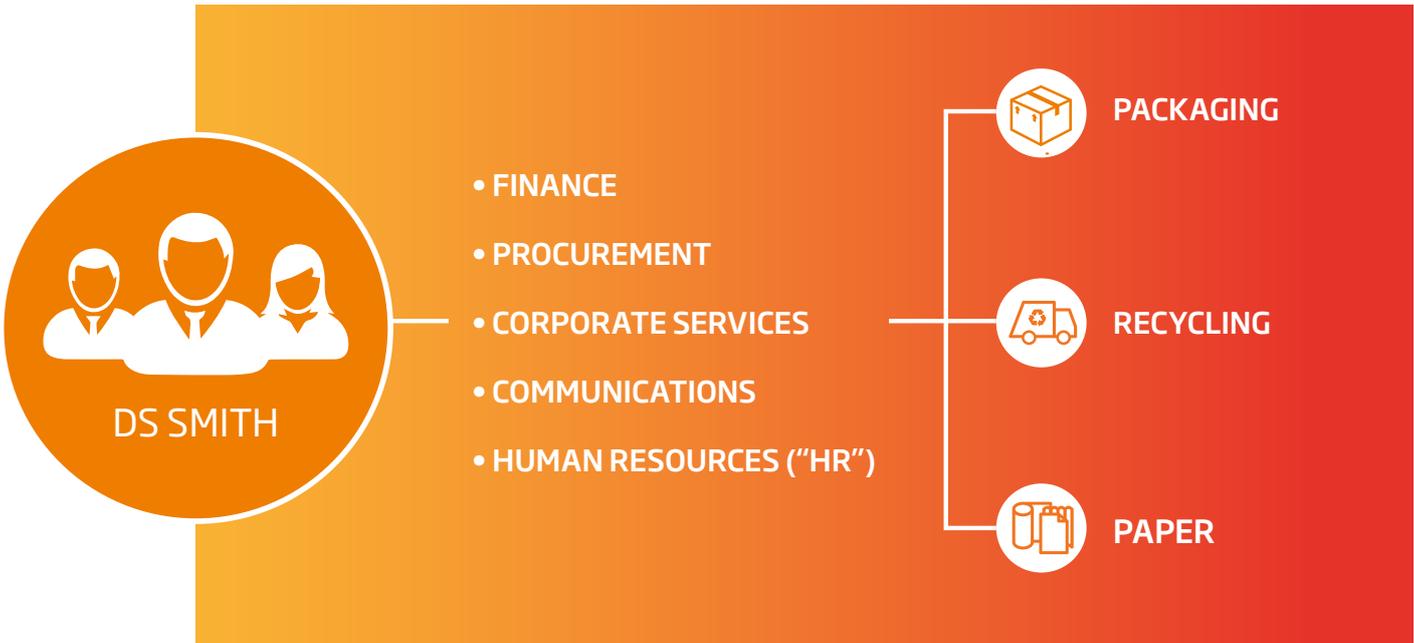
More information about the Group and our locations can be found on our website and our Annual Report.

DS Smith is committed to the highest governance standards in the way we engage with each other, our customers, shareholders, suppliers and other stakeholders. Our reputation is founded on our commitment to and achievement of these high standards. We are committed to acting ethically and with integrity in all our business dealings and seek to implement and enforce effective systems and controls to ensure modern slavery is not occurring within our own businesses or those of our suppliers.

DS Smith aims to build an environment of trust, transparency and accountability which is essential for fostering long-term business integrity. DS Smith is committed to opposing modern slavery and preventing it by whatever means necessary. We demand the same attitude and commitment of all who work for us or with us.

### Organisation structure

The Group is organised as follows:



## 3. Our Policies

Key to our zero-tolerance approach to modern slavery is ensuring that the Group has robust policies and procedures in place relevant to the prevention of modern slavery. In relation to our own operations these policies include our Anti-Slavery and Human Trafficking Policy, 'Speak Up!' Policy, Supplier Management Policy and our Code of Conduct. These policies are available on our website and are aimed at our employees, suppliers and partners. Each policy has been reviewed and formally approved by the Board of Directors of DS Smith Plc (the "Board") or the Group Operating Committee ("GOC").

Employees are regularly made aware of our policies, as mentioned below, and our policies are communicated to newly acquired businesses as part of our formal integration process. DS Smith expects equivalent standards of conduct from all persons acting on its behalf, such as suppliers, agents, and business partners.

DS Smith has refreshed its key policies this year, as detailed below. A communications campaign explaining these key policies and the importance of compliance will be undertaken during the year ending 30 April 2023. This will be further supported by training sessions on each of these core policies.

We have introduced a new policy, the Human Rights Policy, which builds upon the human rights provisions in our Code of Conduct and will be implemented during the year ending 30 April 2023 and will apply to all DS Smith operations and employees.

### 3.1 Anti-Slavery and Human Trafficking Policy

Our Anti-Slavery and Human Trafficking Policy governs our approach to modern slavery in our own and in our suppliers' businesses. It underpins our approach and is used to inform our annual statement on slavery and human trafficking.

DS Smith has a zero-tolerance approach to modern slavery both within the Group and within its supply chain. DS Smith supports and respects the protection of human rights within our sphere of influence; in particular the effective elimination of compulsory labour and child labour. This entails that all work must be undertaken with agreement of both parties, workers must be free to leave work and terminate their employment or other work status with reasonable notice and without requiring workers to

surrender government issued identification, passports or work permits as a condition to work. Workers must be provided with documentation clearly stating the terms of employment in a language the worker can understand.

### 3.2 Code of Conduct

Our Code of Conduct Policy sets out in detail DS Smith's commitment to the highest ethical standards and the behaviours that we expect from our employees and business partners. The Code of Conduct has been updated recently, and as part of the compliance culture of DS Smith there will be internal communication and training on the updated policy. As part of the Group's ongoing legal and compliance efforts and to ensure that our employees are familiar with DS Smith policies and procedures, we have continued with our previously announced initiative whereby every six months employees in managerial or customer/supplier facing roles must confirm their awareness and compliance (and where applicable, the awareness and compliance of their direct reports) with Group policies.

### 3.3 Human Rights Policy

We respect fundamental human rights, which are the basic rights and freedoms that belong to every person in the world, and which include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. We are committed to internationally declared human rights and standards, including:

- The Universal Declaration of Human Rights
- The UN Guiding Principles on Business and Human Rights
- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
- The UN Sustainable Development Goals
- The ten principles of the United Nations Global Compact
- The United Nations International Convention of the Elimination of All Forms of Racial Discrimination

We have incorporated these values, commitments and expectations in relation to human rights in our new Human Rights Policy which will be implemented during the year ending 30 April 2023 and will apply to all DS Smith operations and employees (whether permanent, fixed-term or temporary). All employees will be expected to comply with this policy and report suspected misconduct, non-compliance, or unethical behaviour. The policy will also apply to all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We are committed to the continued improvement of our processes and procedures in this area by regularly carrying out gap analysis of our business to identify areas of improvement, in line with the UN Guiding Principles on Business and Human Rights framework of 'Protect, Respect, and Remedy'. We further strive to improve by setting out and communicating our grievance mechanisms provided in our 'Speak Up!' Policy and providing access to effective remedies if violations or potential violations occur.

DS Smith has implemented an updated internal Modern Slavery and Human Rights incident flowchart, which guides the business on how to handle human rights and modern slavery incidents (whether internal or external) through key steps, depending on the severity of the incident.

### 3.4 Global Supplier Standards

DS Smith has maintained the Global Supplier Standards (GSS) for several years which sets out the minimum conditions which are expected when doing business with or on behalf of DS Smith. One key area covered in these standards is the expectation that all our suppliers and partners comply with the principles of the UK Modern Slavery Act 2015 and equivalent legislation in other jurisdictions (the "Modern Slavery Act").

We are aware of the important role our suppliers play in DS Smith fulfilling its mission and we expect our suppliers to take an active approach to monitoring standards of social responsibility and compliance with applicable laws and regulations. Through compliance with the GSS, our suppliers help maintain our reputation for excellence, independence and integrity.

We are working on updating the GSS based on internal feedback and feedback from our supply chain, which will be launched in the year ending 30 April 2023.

### 3.5 Supplier Management Policy

This policy was introduced during the year ended 30 April 2022 and outlines how we manage suppliers to ensure we are compliant with DS Smith's environmental, social and governance ("ESG") targets and modern slavery commitments. This policy outlines how we expect our suppliers to comply with our GSS, the process for non-compliance with the GSS, EcoVadis assessments, Members Ethical Trade Audit ("SMETA") audit processes, managing modern slavery incidents and monitoring suppliers to ensure there is no slavery or child labour in the supply chain.

### 3.6 Management Standards

DS Smith has implemented management standards which set out the performance standards expected of all managers within the Group ("Management Standards"). The Management Standards include duties on managers to ensure that their teams receive all the information regarding the Group's policies that are relevant to them to ensure that employees fully understand their responsibilities and neither DS Smith nor its employees breach applicable rules or regulations.

### 3.7 'Speak Up!' Policy

The 'Speak Up!' Policy provides guidance on how employee concerns, such as those relating to modern slavery, can be communicated to the Group on a confidential basis and without fear of retaliation. Any concerns about suspected incidents of human rights violations, including modern slavery, may be reported by e-mail, postal service, web or telephone via the independent 'Speak Up!' hotline. Any reports received through 'Speak Up!' are considered by the Audit Committee as part of their regular reviews of internal controls. During the year ended 30 April 2022, a total of 50 reports were received and investigated via 'Speak Up!'. This is an increase from the previous year and is an encouraging sign that there is an increased awareness since the previous year. None of the reports related to modern slavery.

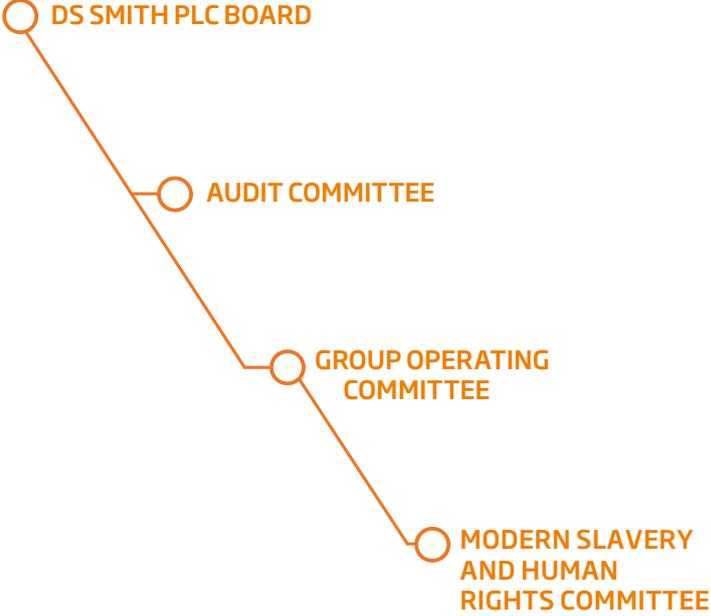
## 4. Our governance

To effectively address modern slavery risks DS Smith potentially faces, a modern slavery steering group (the “Modern Slavery Committee”) was established in 2016. In the year ended 30 April 2022 we strengthened our governance by integrating human rights objectives into the existing Modern Slavery Committee, establishing a modern slavery and human rights steering group (the “Modern Slavery and Human Rights Committee”).

The Modern Slavery and Human Rights Committee is made up of a multi-disciplinary team from different areas within the business and is chaired in two year rotation by the Group General Counsel and Company Secretary, the Group HR Director, the Head of Government, Community Affairs & Sustainability, and the Group Chief Procurement Officer. The Modern Slavery and Human Rights Committee reports to our GOC, chaired by the Group’s Chief Executive Officer, Miles Roberts.

The Modern Slavery and Human Rights Committee meets on a quarterly basis and provides a medium for representatives across the business to input on the Group’s policies and procedures relating to human rights and modern slavery, discuss areas of potential risk, map out improvements to be made across DS Smith to prevent instances of human rights and modern slavery violations occurring and embed this ethos across the Group.

In the year ended 30 April 2022, DS Smith also set up a modern slavery and human rights working group. This working group is made up of individuals from different teams across all divisions, including Legal, HR, Risk, Procurement and Sustainability. The working group meets monthly and aims to ensure consistency of approach with any modern slavery or human rights breaches or incidents identified in the business, and strengthen due diligence in our own operations and supply chain. The working group reports to the Modern Slavery and Human Rights Committee, and it is chaired by Group Sustainability.



### Compliance Committee

The Compliance Committee was formed in January 2020, chaired by the Group General Counsel and Company Secretary. It includes representatives from each division, internal audit and key functions within the Group. This committee meets on a quarterly basis and reports to the GOC and the Audit Committee. The remit of this committee considers the risk and compliance, associated procedures and management or mitigation, where appropriate, of those risks facing DS Smith and our supply chain, including the risk of modern slavery.

### Internal Audit Function

DS Smith’s Internal Audit Function also provides an important oversight role in respect of Modern Slavery and Human Rights within the Group and in 2022/23 will be conducting an audit on the Modern Slavery and Human Rights policies, processes and their implementation, with the guidance of an external audit firm. The findings from this audit will be reported to the Audit Committee and senior management.

## 5. Assessing our risk

Understanding our human rights and modern slavery risk is critical to targeting our actions and partnerships to prevent and address the issue.

### 5.1 Human Rights Risk and Gap Assessment

In the year ended 30 April 2022, we conducted a high-level human rights risk assessment to identify and assess any potential human rights risks across our entire operations and supply chain. This was delivered by an external consultancy and evaluated a range of data sources from all operations and supply chains of the countries in which we operate, against the requirements of the United Nations (UN) Guiding Principles on Business and Human Rights. It also included interviews with key external stakeholders such as suppliers, trade associations, customers and NGOs.

The gap analysis identified that within DS Smith, the recycling business was the main risk area but that the risk of modern slavery and human rights violations was higher in DS Smith’s supply chain. Other than this the report concluded that overall our operations and supply chain are mainly in low to medium risk locations.

The high risk countries identified include those in southern and eastern Europe such as Italy, Greece, Hungary, Romania and Turkey as well as Morocco. The high risk countries were found to be higher risk due to site type (production plant), worker groups (contingent and temporary workers) and type of work (shift work).

There are five priority human rights risks identified across DS Smith and our supply chain:

- Forced labour and child labour
- Health and safety
- Wages and working hours
- Freedom of association
- Discrimination

Three main recommendations were made with two having been implemented in the year ended 30 April 2022, these being: (a) improvement of our internal governance process to identify human rights exposure; and (b) the introduction of our Group Human Rights Policy.

In the year ending 30 April 2023, we intend to address a third recommendation action and to improve data integrity for future human rights assessments and we are committed to complete a focused human rights risk assessment through auditing a selection of our sites and suppliers.

Figure 1 below provides more details on the human rights risk level within the countries in which we operate. Some of these may present high risk not just because of the type of work or type of worker but also the countries our sites are present in and the human rights climate in those countries. DS Smith’s production sites are mainly in medium or lower risk locations. However, Southeast Europe is a notable exception. DS Smith has many production sites in Southeast Europe where the type of work and the affected groups are also at risk of human rights issues. The risk profile of even countries like the UK may currently be shifting due to Brexit related legislation, refugee crises and forced labour risks at recycling plants.

Figure 1



## 5.2 Due diligence

DS Smith uses due diligence as a means to identify and prevent human rights risks in our business and supply chain. We have identified key areas across our operations and supply chain that pose a greater human rights or modern slavery risk, and we are committed to assess our business, and seek to prevent or mitigate any adverse human rights impacts that are directly related to our operations, products or through our business relationships.

Our supplier classification exercise has helped us to categorise suppliers, ensuring robust strategies can be delivered for any suppliers categorised as critical or strategic. Strategic suppliers are defined as those with long term relationships, mutual dependencies and a high level of spend. Our critical suppliers are defined as those supplying a product with a high sustainability risk and those identified as high risk in the EcoVadis risk profiling system. This tool enables us to identify suppliers, countries and categories that potentially pose the highest risk within our supply chain and address those risks appropriately.

These suppliers are going through a rigorous rating system via EcoVadis. Suppliers are expected to meet DS Smith's minimum scoring thresholds for overall performance, with attention focused on labour and human rights. Suppliers that score below the threshold defined by DS Smith or decline to be assessed will go through an escalation process up to our Chief Procurement Officer and may be subjected to an audit and potentially removed from our supply base.

## 5.3 Supplier Ethical Data Exchange ("Sedex") and Self-Assessment Questionnaire ("SAQ")

DS Smith's enterprise risk assessment processes enable us to identify, assess and report on a wide range of risks that could have a plausible and meaningful impact within a three-year horizon. Risk surveys and workshop discussions across different areas of the Group have indicated that the risk of a compliance breach as a result of labour and/or employment practices is rare or unlikely across the Group and that we have effective controls in place, but it was recognised that the impact could be significant if any violations in child labour, forced labour, immigration, or unfair wage decisions, etc., were present in our own operations.

To narrow in on country and site level risks of modern slavery, we have previously used the Global Slavery Index (Walk Free Foundation) to identify inherent vulnerabilities at country level at our individual sites.

During the year ended 30 April 2022, we began the process of moving responsibility for managing modern slavery and human rights due diligence in our own operations into the HR division with the view that the HR network is spread across the Group in a way that makes co-ordinating diligence and completion of appropriate questionnaires a much smoother process.

### Sedex assessments of our own sites

Sedex is one of the world's largest organisations helping companies manage responsible sourcing in their supply chain. They have more than 60,000 members in over 180 countries and operate a collaborative online platform that enables members to collect and share information and map risk. This is done in two ways:

1. SAQ covering health and safety, labour standards, environment and business ethics based on the ILO definition of modern slavery.
2. SMETA, one of the most widely used ethical audit formats in the world which assesses conformance with a site's SAQ answers and the Ethical Trade Initiative ("ETI").

Collectively, this allows operations to manage their ethical and social performance and build trust with their suppliers, helping to protect people, the environment and businesses.

The vast majority of our sites are registered on Sedex, across all divisions in Europe and the USA as well as our satellite locations in China, Morocco and Ukraine, enabling the sites to complete the SAQ upon request from our customers and as required for annual risk assessment.

Although this alone does not prevent modern slavery, it enables sites to identify and assess human rights issues in-depth and report on them. The platform also allows our customers and other stakeholders to look beyond our Group policies, into site-level implementation of ethical business, labour, environment, and health and safety activities.

In the year ended 30 April 2022, approximately one third of our manufacturing sites verified their answers to the SAQ through Sedex's SMETA 4-pillar audits. These audits are conducted by a third-party auditor who assesses compliance with the ETI Base Code. The audits also assess local knowledge and implementation of DS Smith policies. These audits are a well-established procedure, used across multiple industries as a preventative measure for modern slavery, labour and ethical business violations.

Any non-conformances identified during site audits, as well as observations and good examples, are reported to the sites and recorded on the Sedex platform for full transparency with customers. Addressing non-conformances quickly, particularly any critical or major issues, is highly important to us and our customers.

## 6. Training on modern slavery and human trafficking

Managers at all levels are responsible for ensuring that they and those reporting to them understand and comply with policies relating to modern slavery and are provided with appropriate training on modern slavery in the context of their specific roles.

To further strengthen our compliance training, the legal team has developed and rolled out a modern slavery e-learning course in conjunction with an external law firm, Lewis Silkin. This training is mandatory for relevant employees. The training is required on joining the business and employees are required to take a refresher training every 2 years. Employees have to pass a test as part of the training. This training is due to be re-circulated in 2022.

With the update of the Anti-Slavery and Human Trafficking Policy during the year ended 30 April 2022, the legal team will conduct in person and online training sessions on the Anti-Slavery and Human Trafficking and the Human Rights Policy during the year ending 30 April 2023.

## 7. Our supply chains and modern slavery risk

### 7.1 Supply Chain

DS Smith trades almost exclusively with European and USA suppliers other than with our display business where our subsidiary business trades with suppliers in South America, Asia, Middle East and Africa where it is mandatory for all suppliers to be registered with either EcoVadis or Sedex where the business assesses the risk as part of routine Group Procurement due diligence. High risk suppliers are also required to have SMETA audits.

### 7.2 Mitigating modern slavery risk in our supply chain

#### 7.2.1 GSS

As covered under section 3.4.

#### 7.2.2 Contractual Controls

DS Smith's procurement contract templates include a clause requiring suppliers of DS Smith to agree that they comply with the Modern Slavery Act and imposes an obligation on our suppliers to ensure that members of the suppliers' supply chains also comply with the Modern Slavery Act or equivalent applicable legislation and permits DS Smith to audit the operations of a supplier to ensure full compliance with applicable anti-slavery and human trafficking laws. This clause also enables DS Smith to terminate all agreements with the supplier if there has been a breach by the supplier of any applicable law, which includes the Modern Slavery Act.

## 8. How we manage human rights and modern slavery incidents

Our Anti-Slavery and Human Trafficking Policy covers both our own operations and our supply chain. This policy reinforces our commitment to act ethically and with integrity in all our business dealings and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere within our business or supply chain. Central to our work in our supply chain have been our GSS.

We have implemented the Supplier Management Policy which clearly defines the minimum standards expected of our suppliers and the process for dealing with any modern slavery incidents. This policy contains information on how we respond to any incident of modern slavery including our internal response and dealings with the supplier.

## 9. Incident Report

For the year ended 30 April 2022, it came to light that a Polish business that worked as a subcontractor to one of our logistics suppliers in Germany was involved in poor labour practices. This subcontractor was found to have kept a worker in his truck for 17 weeks with only a few euros to spend and no salary for 4 months. The work that was being carried out was not linked to any work being provided to DS Smith, however, this incident confirms that this area has a high risk of modern slavery and human rights violations and we will remain vigilant of this particular supplier but also the region and logistics suppliers in general.

The supplier investigated the matter and issued a statement that they would cease working with the subcontractor in question and reiterated that they have a code of conduct and policies in place which their subcontractors must adhere to. DS Smith conducted a full investigation into the supplier and the supplier followed our normal process of assessment and reminder of our minimum standards. Following our investigation, we did not feel confident in the supplier's practices, so currently we are helping to educate the supplier and have suspended all work with them until we are fully satisfied that their standards meet our minimum expectations.

## 10. Recycling Division

As an area of the business that is particularly at risk of modern slavery issues, in sourcing materials from the marketplace, the Recycling division ensure that they deal with reputable and fully compliant suppliers and all suppliers are subject to scrutiny during the onboarding process. This ensures that not only are they fully compliant with current legislation, but that they also comply with Anti-Slavery and Human Trafficking and Anti-Bribery and Corruption policies. Every effort is made to ensure that the supply chain remains clean and that fibre is sourced from reliable and traceable sources.

## 11. Impact of Covid-19

DS Smith recognises that the Covid-19 pandemic exacerbated the risk to already vulnerable workers because of a combination of heightened health, safety and economic risks which created the potential for increased exploitation, human trafficking and modern slavery. Certain workers, particularly those who are affected by poverty, inequality and lack of proper work opportunities, including migrants, faced issues accessing health care or sick leave and lack of adequate personal protective equipment ("PPE") in the workplace; they feared being tested in case this led to them not being allowed to work and earn a living; or were not able to self-isolate because of staff accommodation and the financial burden of not being able to work.

DS Smith provided clear and strict guidance to all of our operations to ensure human and labour rights were respected and we continue to remain vigilant in order to ensure we continue to comply with all government rules. We have ensured that all workers have been able to return home if working abroad; that the correct PPE is available and is being correctly utilised; that our workforce are able to support their families; and health and safety has remained our number one priority at all times within our operations or where employees have had to work remotely. We continue to work with our suppliers to avoid the potential for increasing any modern slavery risk in our supply chain.

## 12. The war in Ukraine

The devastating human crisis caused by the war in Ukraine has increased the risk of modern slavery and other forms of exploitation for those displaced by the war. Millions of people have been displaced, many of whom have fled Ukraine. Those seeking refuge abroad, overwhelmingly women and children, face huge risks. These risks are not just at the border or along their journey but also at the destination country where predators may see the war in Ukraine not as a tragedy but as an opportunity.

Mass displacement of people taking place due to the war alongside the breakdown of law and order, major disruption to critical systems, infrastructure and support networks, a lack of basic resources and a general uncertainty among those fleeing Ukraine about what to do, where to go and who to trust all lead to an increased risk of modern slavery. People in danger and struggling to meet basic needs may often be forced into constrained decision making processes. The conflict forces refugees, many of whom have been exposed to significant trauma, to make unthinkable choices under unthinkable conditions, leaving many vulnerable to exploitation.

DS Smith remains watchful to ensure that we have in place processes and procedures to ensure the risks of trafficking and exploitation do not become a reality within DS Smith and its sphere of influence.

## 13. Key performance indicators to measure effectiveness of steps being taken

Where we said we would focus in 2021/2022	What we achieved
Reassess many of our strategic suppliers and drive their EcoVadis scores up.	We have helped to improve the EcoVadis scores of many of our strategic suppliers, by ensuring they complete corrective actions.
Ensure 100% of suppliers with annual spend above £10k are risk assessed via EcoVadis IQ.	More than 90% of suppliers with annual spend over £10k have been risk assessed by our risk profiling tool. 100% of strategic and critical suppliers confirmed as complying with our ethical and sustainability standards through EcoVadis assessment.
Establishment of Modern Slavery and Human Rights working group.	A new Human Rights and Modern Slavery Committee and working group have been formed to ensure risks are discussed and managed appropriately.
Embed new performance measures for SAQs and SMETA audit reports into governance and reporting procedures, to drive accountability for SMETA outcomes into HR and Operations communities.	We are rolling out the revised Sedex SAQ to all sites. More accountability taken at site level, supported by members of our local HR communities, to implement ethical improvements in response to non-conformances in audits. 96% of sites have completed the old version of Sedex SAQs; one third of sites have completed or nearly completed the new SAQ.
Improving the completion rate for modern slavery e-learning course.	We continue to require key employees to complete the modern slavery e-training course. We have recently relaunched the training on a new platform which enables real time tracking of course training completion. Current completion rate of the online e-learning platform has improved since last year and is now at 94%.

Focus for 2022/2023	What we achieved
Ensure 100% of our critical and strategic suppliers adhere to our Supplier Management Policy.	
Continue annual risk assessment of our suppliers through EcoVadis IQ.	
At least 50% of our sites to complete the (new) SAQ.	
Annual risk assessment for our operations and supply chain.	
Continue to embed new performance measures into governance and reporting procedures, to drive accountability for SMETA outcomes into HR and Operations communities.	
SMETA audit for sites that are identified as high risk.	
Implement the new Human Rights Policy and undertake the communications strategy for updating the business.	
Update the Global Supplier Standards.	
Re-circulate our online modern slavery training.	
Legal/Sustainability team will conduct in person/ online (Teams) training sessions on the updated Anti-Slavery and Human Trafficking Policy.	
Internal audit to conduct an audit on the Modern Slavery and Human Rights policies, processes and their implementation with the guidance of an external audit firm.	

This statement is made pursuant to section 54(1) of the U.K. Modern Slavery Act 2015 and constitutes our Group’s Slavery and Human Trafficking Statement for the year ended 30 April 2022 and has been approved by the Board of Directors of DS Smith Plc.

**Miles Roberts**

Group Chief Executive September 2022

