



Anti-Slavery & Human Trafficking Policy

Effective Date	Author	Owner	Approval	Last Review	Revise Date
August 2017	Anne Steele	Anne Steele		June 2016	August 2019



ANTI-SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

As a Group, DS Smith maintains relationships with many different organisations in its supply chain, as well as directly employing large numbers of people. DS Smith has a zero-tolerance approach to modern slavery both within the Group and within its supply chain. We have reviewed our existing compliance and risk management processes following the introduction of the Modern Slavery Act 2015 to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains. The policy below underpins our approach, and will be used to inform our annual Statement on Slavery and Human Trafficking.

Our Code of Conduct states that DS Smith respects fundamental human rights and is committed to the principles set out in the United Nations Universal Declaration of Human Rights. We support and respect the protection of human rights within our sphere of influence; in particular the effective elimination of compulsory labour and child labour. The Code of Conduct governs 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.

This Code of Conduct applies to all DS Smith Group operations and employees. DS Smith expects equivalent standards of conduct from all persons acting on its behalf, such as suppliers and partners.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings. Our attitude to modern slavery is: zero tolerance.

Miles Roberts
Group Chief Executive
August 2017



1. Purpose of this Policy

- 1.1 Modern slavery is a criminal offence under the UK Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of DS Smith (the "Group") with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.
- 1.2 As a Group, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

2. Steps for the Prevention of Modern Slavery

- 2.1 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We require our suppliers to hold their own suppliers to the same high standards.
- 2.2 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we have implemented the following measures and will continue to review and update them:
- a) conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
 - b) engage with our suppliers both to convey to them our Anti-Slavery and Human Trafficking Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses and their supply chain;
 - c) introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
 - d) introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.



3. Responsibility for the Policy

- 3.1 Ultimate responsibility for the prevention of modern slavery rests with the Group's leadership. The Board of Directors of DS Smith Plc has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.
- 3.2 Managers at all levels are responsible for ensuring those reporting to them:
 - o understand and comply with this policy; and
 - o are given adequate and regular training on it and the issue of modern slavery.

4. Actions to Report Modern Slavery or Human Trafficking

4.1 Internal

- o Employees are encouraged to raise any concerns about suspected modern slavery associated with the Group or our suppliers and should do this either through their line manager or by using "Speak Up!" (details of which can be found on [Plexus](#)).
- o All matters will be dealt with in confidence and in strict accordance with the terms of the Public Interest Disclosure Act 1998, which protects the legitimate personal interests of employees and workers, and other applicable laws in the jurisdictions where the DS Smith Group operates.

4.2 External

- o Members of the public or people not employed by the Group to write, in confidence, to the Group General Counsel and Secretary (either via e-mail: AskCoSec@dssmith.com or to the registered office) to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

- 4.3 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

- 4.4 The Group will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective.

Individuals are therefore encouraged to put their names to allegations.



5. Breaches of this Policy

- 5.1 If an issue is identified with a supplier we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period.
- 5.2 We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

6. Communication and Awareness of this Policy

- 6.1 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

7. Review

- 7.1 Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Group's Board of Directors on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Slavery and Human Trafficking which will be published annually.