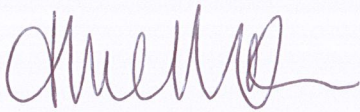


Modern slavery statement for financial year 2017/2018

Siva Group is strongly opposed to slavery and human trafficking. We strive to act ethically and with integrity in all our business dealings and relationships to ensure that slavery and human trafficking is not taking place within our organisation or our supply chains.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015. It provides some background to our organisation and our supply chains and it sets out the steps that Siva Group has taken during the financial year ended 31 October 2018 to ensure that slavery and human trafficking are not taking place, either in our organisation or in our supply chains.



Hannah Mehta
Director

Our business

Siva Group is one of Europe's most dynamic manufacturers of flexible packaging products, flexographic printing and adhesive lamination. Siva Group comprises Siva Holdings Limited and its subsidiary, Siva Plastics Limited. This statement covers both Siva Holdings Limited and Siva Plastics Limited.

Our policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Anti-slavery policy.** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. **Bullying and Harassment Policy.** This is designed to help ensure that all of our staff are treated with both dignity and respect.
4. **Health, Safety and Environment Policy.** A key aim of this policy is to ensure the wellbeing of all our employees and anyone else who may be affected by our activities.
5. **Whistleblowing policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

6. **Fraud and Corruption Policy.** This reminds our employees to take account of any improper or suspicious behaviour or situations and to report and deal with the risk of fraud and corruption.

Our policies are regularly monitored by a relevant policy owner within our business. We will continue to review our policies to ensure that they are effective and appropriate.

Our suppliers

Siva Group's supply chains include the sourcing of raw materials principally related to the production of flexible packaging.

We conduct due diligence on all suppliers before allowing them to become a key supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Where possible we build long standing relationship with suppliers and we make clear our expectations of business behaviour.

Training

We try to ensure that adequate information and training is provided to all our employees. Here are some examples of the information and training we provide:

- All new joiners attend an induction session which includes information and training on our policies; and
- Our buying team, assisted by our legal counsel, routinely seek out information and training to help identify and address risks in both our business and supply chain (including in relation to slavery and human trafficking) and will continue to do so.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors on 5 April 2019.

Name: Hannah Mehta
Position: Director

End of financial year: 31 October 2018
Approved by the board: 5 April 2019