



Axia Plastics – Anti-Slavery & Human Trafficking Policy

Axia Plastics, a Vinmar company, is committed to conducting business ethically and ensuring that modern slavery, human trafficking, forced labour, and child labour are not tolerated in any of its operations or supply chains in Europe.

Who This Applies To

This policy applies to all Axia Plastics employees, contractors, agents, interns, consultants, volunteers, business partners, suppliers, and other third parties operating in Europe. It forms part of Vinmar’s global compliance framework and aligns with the UK Modern Slavery Act 2015 and relevant European Union legislation.

Key Principles

1. Integrity & Human Rights

- Zero tolerance for slavery, servitude, forced labour, human trafficking, or child labour
- Compliance with all applicable UK and EU anti-slavery laws
- Expectation that all suppliers and partners uphold the same standards

2. Responsible Operations & Supply Chains

- Multi-tiered supply chains in Europe require risk-based monitoring, including onboarding, contractual anti-slavery clauses, and sustainability requirements
- Suppliers in high-risk geographies or sectors may undergo enhanced due diligence and audits
- Corrective actions, remediation plans, or termination may be enforced if non-compliance is identified

3. Raising Concerns / Speak-Up

- Employees and partners must report suspected modern slavery to management, HR, Compliance, or the **Axia / Vinmar Speak-Up Hotline**
- Good-faith reporters are fully protected from retaliation, dismissal, or disciplinary action

4. Due Diligence & Risk Assessment

- Suppliers are assessed based on geography, sector, type of work, and compliance history
- High-risk suppliers are subject to additional scrutiny and site audits
- Findings inform corrective actions, continuous improvement, and statutory reporting requirements in the UK and EU

5. Training & Awareness

- Annual compliance training covers anti-slavery, human rights, Code of Conduct, and related topics
- Policy guidance, updates, and lessons learned are communicated to all Axia employees and partners across European operations

6. Monitoring, Effectiveness & Continuous Improvement

- Regular audits, questionnaires, and inspections ensure compliance
- Key Performance Indicators (KPIs) include:
 - Number of suppliers assessed and audited



- Non-compliance incidents identified and remediated
- Training completion and engagement metrics
- Improvement in supplier risk ratings over time
- Lessons learned are applied to updating policies, procedures, and training programs

Why This Matters

Following this policy:

- Protects **Axia Plastics' and Vinmar's reputation** in Europe
- Promotes transparency, accountability, and measurable progress in combating modern slavery
- Strengthens partnerships and reinforces a culture of integrity across European operations

Supporting Documents

- [Vinmar Homepage – Compliance](#) – access Vinmar's global compliance resources, including:
 - Global Code of Conduct
 - Health, Safety & Environment (HSE) Policy
 - Speak-Up / Whistleblower Hotline
 - Other compliance-related policies

