

# Modern Slavery Statement 2025

## Introduction

Premier Paper Group conducts business ethically, responsibly and with integrity and it is committed to preventing modern slavery and human trafficking from occurring within its operations and supply chains.

This statement sets out the actions taken by Premier Paper Group and its subsidiary companies to manage modern slavery risks in an endeavour to ensure that slavery, servitude, forced labour and human trafficking do not arise within its corporate activities.

## 1. Organisational Structure and Supply Chains

### Premier Paper Group Limited

Premier Paper Group is a paper merchant, and it distributes paper, packaging, and other print media products to customers through its UK network of local sales and logistics teams.

Most products supplied by Premier Paper Group are sourced from leading paper and packaging manufacturers located within the UK and the European Union (EU). A small proportion of products are sourced from manufacturers located in non-EU countries.

Premier Paper Group's subsidiary businesses are also committed to preventing slavery and human trafficking within their own operations and supply chains.

#### (i) Wine Box Company Limited

Wine Box Company is a wholesale supplier of packaging, display products and fabric bags to the specialist drink and food sectors. Products supplied by Wine Box Company are sourced from UK, EU, and non-EU manufacturers.

#### (ii) Graphic & Paper Merchants Ireland Limited (GPMI) and Graphic & Paper Merchants Northern Ireland Limited (GPMNI)

GPMI and GPMNI supply paper, board, plastics and technology solutions to graphic printers and converters throughout Ireland and Northern Ireland. Products are sourced from UK, EU, and non-EU suppliers.

#### (iii) Reilly Plastics Limited

Reilly Plastics supplies plastic products to a broad range of customers, including those operating within the food processing, food service, and engineering sectors. Products are sourced from suppliers based in the UK and EU.

## 2. Our Policies and Procedures

Premier Paper Group maintains a range of policies and procedures which supports its commitment to ethical business practices and the prevention of modern slavery.

### a. Supplier Onboarding and Approval

Premier Paper Group operates a supplier onboarding process designed to assess prospective suppliers before entering a commercial relationship.

As part of this process, suppliers are required to complete a supplier onboarding questionnaire and provide information relating to legal compliance, ethical business conduct, environmental responsibility and, where appropriate, their approach to modern slavery and human rights.

Suppliers are expected to comply with all applicable laws and regulations and to demonstrate a commitment to preventing slavery, servitude, forced labour and human trafficking within their own operations and supply chains.

Supplier information is periodically reviewed and, where appropriate, updated assurances are sought from existing suppliers regarding compliance with ethical and responsible sourcing requirements.

### **b. Procurement Standards**

We are committed to ensuring that our suppliers adhere to high standards of ethical conduct. Suppliers are expected to provide safe working conditions, treat workers fairly and respectfully, comply with applicable employment legislation and operate in accordance with recognised human rights principles.

Wine Box Company's Ethical Business Policy recognises the responsibility it shares with its suppliers to source products in an ethical manner.

### **c. Recruitment and Agency Workers**

Premier Paper Group operates recruitment and employment practices that comply with UK and Irish employment legislation.

All employees are subject to appropriate right-to-work checks before employment commences. Where agency labour is utilised, we work only with reputable employment agencies and undertake appropriate checks before engaging new providers.

### **d. Code of Business Conduct**

Our Code of Business Conduct sets out the standards of behaviour expected of all employees and stakeholders. These standards reinforce our commitment to acting ethically, treating people with dignity and respect, and conducting business responsibly.

### **e. Whistleblowing Policy**

Premier Paper Group maintains a Whistleblowing Policy that enables employees and other stakeholders to raise concerns regarding suspected wrongdoing, including potential incidents of modern slavery, forced labour or human trafficking.

Reports may be made without fear of retaliation or victimisation and are treated seriously and investigated where appropriate. Employees are encouraged to raise concerns through their Line Manager, HR Department, or other designated reporting channels.

Third parties, including customers, suppliers and contractors, may also report concerns relating to any suspected unethical business conduct through the Company's Code of Conduct reporting mechanism by contacting: [codeofconduct@paper.co.uk](mailto:codeofconduct@paper.co.uk)

### 3. Assessing & Managing Risk

#### (i) Risk Assessment

Premier Paper Group recognises that modern slavery risks can exist in all sectors and geographies. As part of our ongoing risk assessments, the Group's procurement and supply chain functions undertake reviews of our supplier base including consideration of supplier spend, product categories, sourcing locations and the nature of goods and services procured.

The most recent assessment confirmed that most of our procurement expenditure relates to established suppliers located within the UK and European Union, where the risk of modern slavery is considered lower due to mature regulatory frameworks and labour protections.

Where appropriate, suppliers operating in higher-risk sectors or geographies may be subject to additional due diligence including requests for supporting information relating to labour standards, ethical business practices, and human rights controls.

The business continues to refine its risk assessment processes as appropriate.

#### (ii) Governance and Responsibility

The Board and Group Executive Team have overall responsibility for ensuring that appropriate systems and controls are in place to identify, assess and mitigate modern slavery risks throughout the Group.

Responsibility for implementing our anti-slavery initiatives is delegated to Directors and Senior Managers within their respective business areas and functional departments.

Premier Paper Group expects all employees, suppliers, contractors, and business partners to uphold our commitment to ethical business conduct and compliance with all applicable laws relating to labour and human rights.

### 4. Due Diligence

Most products supplied by Premier Paper Group are sourced from manufacturers located within the UK and European Union, with some products sourced from manufacturers in non-EU countries.

Many key suppliers operate internationally recognised management systems and maintain certifications and accreditations that support responsible sourcing and ethical business practices.

Premier Paper Group maintains FSC® and PEFC Chain of Custody certification. These certification schemes include social and legal compliance requirements and support responsible sourcing throughout the supply chain.

Wine Box Company maintains membership of the Supplier Ethical Data Exchange (SEDEX), which supports its due diligence processes in preventing modern slavery and human trafficking in its supply chains. From June 2025, Premier Paper Group also registered with SEDEX.

Supplier relationships are managed through ongoing commercial engagement and regular interaction with key suppliers. Where appropriate, discussions relating to sustainability, ethical sourcing and responsible business practices form part of these relationships.

If any concerns relating to modern slavery are identified, Premier Paper Group will engage constructively with the relevant supplier to support the implementation of appropriate corrective actions. Where a supplier is unwilling or unable to address identified concerns, Premier Paper Group reserves the right to review the commercial relationship and, where necessary, terminate the arrangement.

## 5. Training and Awareness

Premier Paper Group is committed to raising awareness of modern slavery risks throughout its businesses.

Employees are provided with information on the Company's Modern Slavery Statement, including how to identify and report concerns relating to modern slavery within the workplace and supply chain.

Additionally, employees have also been provided with information on recognising indicators of modern slavery in wider society and guidance on how to report concerns through appropriate external channels.

Selected employees within procurement, supply chain, HR, and management functions have completed human rights training to strengthen awareness of modern slavery risks and appropriate mitigation measures.

Premier Paper Group is certified to ISO 9001 and ISO 14001 standards. These internationally recognised management systems also demonstrate the Group's commitment to quality, environmental stewardship and continual improvement and support its wider commitment to responsible and ethical business practices, including social governance.

## 6. Monitoring Effectiveness

To assess the effectiveness of our actions to prevent modern slavery, Premier Paper Group monitors and reviews:

- Supplier onboarding and due diligence processes.
- Supplier declarations and ethical compliance commitments.
- Employee training and awareness activities.
- Whistleblowing reports and related investigations.
- Supplier non-conformances and corrective actions.
- Changes in supply chain risk profiles arising from sourcing decisions or geographic developments.

We remain committed to continually improve our policies, risk assessments, procedures, and due diligence activities to support the prevention of modern slavery and human trafficking throughout our operations and supply chains.

**Approval**

This statement relates to the financial year ending 31 December 2025 and has been approved by Premier Paper Group in accordance with Section 54 of the Modern Slavery Act 2015.

**Michael Beaver**

Group CEO – Premier Paper Group  
June 2026