Creating circular progress

2025 MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

From:	EPG Board of Directors
Subject/ Project:	Modern Slavery and Human Trafficking Statement 2025
Date:	June 2026

Introduction

This statement is published in accordance with the UK Modern Slavery Act and sets out the steps taken by Euro Pool System International B.V. ('**Euro Pool Group'**), the reporting entity. Euro Pool Group does not accept modern slavery and human trafficking in any way or form and also wants to prevent it from happening in any of its business or supply chains.

This statement applies to all Euro Pool Group subsidiaries for the financial year 2025.

Euro Pool Group's business operations and supply chains

Euro Pool Group is composed of three divisions, being the EPS - Euro Pool System division ('**Euro Pool System**'), the LPR – La Palette Rouge division ('**La Palette Rouge'**) and StackandTrack division ('**Stack&Track'**) Euro Pool System was founded in 1992 by the cooperative auctions in Belgium, Germany, and the Netherlands. LPR was established in 1992 and was acquired by Euro Pool Group in 2011.

Euro Pool Group is the largest logistics service provider for reusable standard packaging in Europe. With a solid position in Europe and operations in more than 30 countries, Euro Pool Group provides value added logistic services to retailers, FMCG companies, fruit & vegetable producers, and other partners in the (fresh) food and non-food supply chains throughout Europe. By sharing the benefits of reusable standard packaging solutions with its customers and stakeholders, Euro Pool Group contributes to the transition towards a circular economy.

Responsible Business

Euro Pool Group conducts its business in line with its values and the highest possible standards that exist within the European Pooling Industry. It supports and respects internationally recognized human rights and believes in respectful and honest business relations, therefore Euro Pool Group does not accept modern slavery and human trafficking in any way or form and also wants to prevent it from happening in any of its business or supply chains.

Euro Pool Group developed over the years a framework of internal policies and guidelines to promote responsible entrepreneurship and to prevent, detect and respond to (allegations of) unethical or illegal activity in its business or supply chains. Euro Pool Group has furthermore taken steps to prevent modern slavery in its business operations by building the following framework:

- **Code of conduct:** The Code of Conduct of Euro Pool Group forms the core of the compliance framework of Euro Pool Group and is supplemented with policies and guidelines which address specific compliance related topics. The Code of Conduct sets out binding rules and guidelines on how employees of, and other people working for Euro Pool Group should conduct business: in a responsible manner. The Code of Conduct explicitly sets out that Euro Pool Group conducts its business with integrity and respect for human rights and that it respects and supports internationally recognized human rights for all stakeholders.

Euro Pool Group has zero-tolerance for child labour and forced labour and contributes to the elimination of child labour and forced labour wherever it can. Euro Pool Group expects all its business partners to do the same.

Euro Pool Group's Code of Conduct is distributed among all its employees and can be easily accessed through its intranet.

- **EPG Supplier Code of Conduct** : EPG has implemented in its supply chain a supplier code of conduct ('**EPG Supplier Code of Conduct'**), pursuant to which it reiterates towards its suppliers their obligation to comply with all applicable laws and regulations, including laws prohibiting modern slavery and human trafficking.

- **Social audits**: following a pilot in 2023, a social audit policy was adopted to regulate supply chain due diligence and suppliers social audit.

- **EPG Speak-Up/Whistleblower policy:** Euro Pool Group encourages all its employees, and other people working for Euro Pool Group to report any concerns related to unethical or illegal behaviour. Euro Pool Group's whistleblowing procedure is designed to make it easy for such persons to report concerns, without fear of retaliation. Employees who have concerns can report these following our internal reporting procedure or use our confidential / anonymous Speak Up line, operated by an external service provider.

- **EPG Third Party Whistleblower Policy:** Euro Pool Group encourages all suppliers, service providers, contractors and sub-contractors and their respective employees to report to Euro Pool Group any suspected or known improper conduct, the EPG Third Party whistleblower Policy is available on all external websites of Euro Pool Group and the divisions.

- **Procurement Policy:** Euro Pool Group has a procurement policy which serves as a (comprehensive) framework to guide procurement activities, uphold ethical standards, and mitigate risks, including risk of modern slavery and human trafficking, across all divisions of Euro Pool Group. Compliance trainings specifically dedicated to the procurement policy were provided by Euro Pool Group to its staff in 2025.

- **Engagement of Suppliers:** Euro Pool Group is committed to conduct its business in a responsible manner and expects the same from its suppliers. The (standard) purchase terms and conditions of Euro Pool Group and individual supply agreements concluded with suppliers and service providers (will) require suppliers and service providers to comply with all applicable laws and regulations, including laws prohibiting modern slavery. Euro Pool Group's suppliers will need to uphold and actively pursue a zero-tolerance policy towards child labour and forced labour. The EPG Supplier Code of Conduct is part of all new contracts with suppliers.

- **Risk assessment**: Euro Pool Group has included in its annual risks assessment (pursuant to the COSO Enterprise Risk Management model) the risk of modern slavery and human trafficking in its operations. The Compliance Officer, together with the Integrity Committee,

takes into account Euro Pool Group's risk mitigating measures, that will be further implemented throughout the organisation.

Training

Euro Pool Group expects its employees to act in line with its Code of Conduct, which is available in English and 11 other languages on Euro Pool Group's intranet. In view hereof, as per the start of an individual's employment or engagement with Euro Pool Group, all employees and officers are required to acknowledge receipt of and to have read the Code of Conduct. Furthermore, employees are periodically trained on the corporate values and business principles of Euro Pool Group, including by means of e-learning modules on, amongst others, its Speak-Up/Whistleblower policy.

Future steps

Euro Pool Group is constantly reviewing its compliance and contractual framework to ensure compliance with applicable laws and regulations and to prevent risks of modern slavery. To the best of its knowledge, there is no modern slavery or human trafficking taking place in its supply chains.

Euro Pool Group will continue developing its social audit policy and conducting social audits within its supply chain.

Euro Pool Group will furthermore continue to provide to its relevant staff compliance trainings dedicated to the prevention of modern slavery and will revise its compliance training program in order for this topic to be addressed systematically for new hires and regularly for existing employees. Furthermore, Euro Pool Group will require its employees who are involved in the selection process of suppliers, to participate from time to time to a training on ethical procurement and supply.

Board approval

This statement was approved by Euro Pool Group's board of directors on 30 June 2026.

Mr. G.J. Scheringa **Mr. R. van der Steeg**