MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2020

1. INTRODUCTION

This statement is published in accordance with the UK Modern Slavery Act and sets out the steps taken by LPR – La Palette Rouge (GB) as part of the Euro Pool System International B.V. (Euro Pool Group) to prevent modern slavery in its business and supply chain. This statement applies to LPR – La Palette Rouge (GB) for the financial year 2020.

2. EURO POOL GROUP’S BUSINESS OPERATIONS AND SUPPLY CHAINS

Euro Pool Group is composed of 2 divisions, being the Euro Pool System division (Euro Pool System) and the LPR – La Palette Rouge division (La Palette Rouge). 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 an overall presence in 18 European countries and operations in more than 30 countries, Euro Pool Group’s 1,000+ employees provide value added logistics services to retailers, FMCG companies and other partners in the (fresh) food chain 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.

3. RESPONSIBILITY

LPR – La Palette Rouge (GB) 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.

Since 2015, Euro Pool Group has developed and implemented within its subsidiaries, including LPR – La Palette Rouge (GB), a framework of internal policies and guidelines to promote responsible entrepreneurship and to prevent, detect and respond to (allegations of) unethical or illegal activity. Euro Pool Group has furthermore taken steps to prevent modern slavery in its business operations:

- **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 how employees of, and other people working for, Euro Pool Group and its affiliates 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 of human rights and that it respects
and supports internationally recognized human rights for all stakeholders. Euro Pool Group expects all its business partners to do the same. Euro Pool Group’s Code of Conduct is distributed among its employees and can be accessed through its intranet.

- **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 use our confidential / anonymous Speak Up line, operated by an external service provider.

- **Engagement of Suppliers** Euro Pool Group is committed to conduct its business in a responsible manner and expects from its suppliers to do the same. The standard (purchase) terms and conditions of Euro Pool Group and individual supply agreements concluded with suppliers and service providers require suppliers and service providers to comply with all applicable laws and regulations, including laws prohibiting modern slavery.

4. **TRAINING**

LPR – La Palette Rouge (GB) expects its employees to act in line with Euro Pool Group’s 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, amongst others its Speak-Up/Whistleblower policy.

5. **FUTURE STEPS**

To the best of its knowledge, LPR – La Palette Rouge (GB), and by extension Euro Pool Group, considers the risks of modern slavery/human trafficking taking place in its supply chain to be very low. Euro Pool Group is however constantly reviewing its compliance program and contractual framework to ensure compliance with applicable laws and regulations and to prevent risks of modern slavery.

6. **BOARD APPROVAL**

This statement was approved by LPR – La Palette Rouge (GB)’s Director.

November 29, 2021

Geert Johan Scheringa