

Koen Pack Modern Slavery Statement

Our mission: "Koen Pack creates everything to make flowers and plants more beautiful, with respect for people and the environment and delivers it all over the world with the Personal Touch". In our mission to do business with respect for people, we are making this voluntary statement under section 54 of the "Modern Slavery Act. 2015" to show our commitment to ethical trading principles and set out the steps we take to enforce effective systems and controls aimed at ensuring that modern slavery does not occur within our business and our supply chains. This statement has been approved by the Board of Directors.

Modern Slavery is an umbrella term that refers to the severe exploitation of people for personal or commercial gain, which includes human trafficking and compelled labour. As stated in the Modern Slavery Act.2015, an offence is committed if (a) a person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or (b) a person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour. Businesses must be aware of the risks of modern slavery and act responsibly to ensure decent working conditions in both their own business and their supply chain.

Koen Pack is a wholesale business that supplies packaging materials and decorative products for the flower and plant industry. Alongside the office in the Netherlands, there are offices in Canada, the United States, Columbia, Ecuador and China. The main operations are: the design of new products, the purchase of products from suppliers in e.g. Portugal, China, Turkey and the Netherlands, and the selling and distribution of products to retailers all around the world.

Policy

Koen Pack's commitments to ethical trading principles, among them the prevention of modern slavery, are set out in The Koen Pack Social and Environmental Standards that are based on The Ethical Trading Initiative Base Code. This policy is signed by all Koen Pack offices and all suppliers to demonstrate to (a) provide safe working conditions, (b) treat workers with respect and (c) act ethically and within the law in their use of labour.

Enclosure: Koen Pack Social and Environmental Standards

We, The Koen Pack Group, are expecting suppliers and their subcontractors to establish and implement the following 10 social and environmental standards that are based on The Ethical Trading Initiative Base Code . In case of conflicting standards between the Koen Pack Group Code of Conduct and national law or any other applicable agreements, the highest standard will always apply.

1) Employment is freely chosen

- a) There is no forced, bonded or involuntary prison labour.
- b) Workers are not required to lodge 'deposits' with their employer and are free to leave their employer after the statutory notice period of 1 month.

2) Freedom of association and the right to collective bargaining are respected

- a) Workers without distinction have the right to join or form trade unions of their own choosing and to bargain collectively.
- b) The employer adopts an open attitude towards the activities of trade unions and their organization activities.
- c) Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- d) Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates and does not hinder the development of parallel means for independent and free association and bargaining.

3) Working conditions are safe and hygienic

- a) A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of associated with, or occurring in the course of work, by minimizing so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- b) Workers shall receive regular and recorded health and safety training and such training shall be repeated for new or reassigned workers.
- c) Access to clean toilet facilities and to potable water, and if appropriate sanitary facilities for food storage shall be provided.
- d) Accommodation, where provided shall be clean, safe and meet the basic needs of the workers.
- e) The company observing the code shall assign responsibility for health and safety to a senior management representative.

4) Child labour shall not be used

- a) There shall be no new recruitment of child labour.
- b) Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- c) These policies and procedures shall conform to the provisions of the relevant ILO standards.

5) Living wages are paid

- a) Wages and benefits paid for a standard working week meet at a minimum national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs.
- b) All workers shall be provided with written and understandable information about their employment conditions in respect to wages before the pay period concerned each time that they are paid. 3. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6) Working hours are not excessive

- a) Working hours must comply with national laws, collective agreements, and the provisions below, whichever affords the greater protection for workers. Working hours are based on international labour standards.
- b) Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- c) All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated through time compensation.
- d) The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by the clause below:
- e) Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:
 - this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety; and
 - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- f) Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.

7) No discrimination is practiced

There is no discrimination in hiring, compensation access to training, promotion, termination or retirement based on race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8) Regular employment is provided

a) To every extent possible work performed must be on the basis of recognized employment relationship established through national law and practice.

b) Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour.

Contracting, subcontracting or home working arrangements or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed term contracts of employment.

9) No harsh or inhumane treatment is allowed

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

10) Management systems

The employer shall implement the requirements of these standards, periodically review the fulfilment of these requirements, and regularly communicate the content of the standards to all personnel. The employer shall make sure that the requirements of these standards are also implemented by its subcontractors.

Risk management

In order to monitor ethical efforts and the adherence to the Koen Pack social and environmental standards, Koen Pack takes the following steps.

The staff regulations of the Koen Pack office in the Netherlands contain a code of conduct and ethics that includes guidelines for ethical awareness during the execution of daily operations. An appointed confidant serves as a point of contact for the reporting of concerns. In the office in the Netherlands, an ethical audit in the form of a Risk Assessment and Evaluation is conducted by an independent third party to monitor the adherence to the Koen Pack social and environmental standards.

Alongside this, Koen Pack is partner of Sedex and MVO Nederland to take our responsibility for- and make agreements on ethical and societal issues like modern slavery. For the future Koen Pack will continue to highlight the code of conduct and ethics and encourage the reporting of concerns.

A risk analysis identifies the main risks for modern slavery to be found in our supply chain. Our purchasers establish long-lasting relationships with our suppliers and clearly highlight that we expect that our suppliers will hold their own suppliers to the same social and environmental standards that we hold them to. In order to minimize the risk of modern slavery, we encourage all our suppliers to join Sedex and we are a partner of BSCI by amfori to commit to equal and decent working conditions throughout our supply chain. For the future we will continue our efforts for a business environment of trust and transparency with our suppliers to stay on top of the business behaviour throughout our supply chain.


Jan-Paul Rijke
Managing Director