



# Macfarlane Group PLC

## Statement of Compliance

Slavery and Human Trafficking 2025



11<sup>th</sup> June 2026

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps Macfarlane Group PLC and its subsidiary companies ("Macfarlane Group" or "the Group") take to ensure that modern slavery or human trafficking does not take place within our business or supply chain.



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## **CEO Introduction**

Our statement sets out the actions that the Group is taking to help ensure that slavery and human trafficking are not taking place in the Macfarlane business or any part of our supply chain.

We continue to increase awareness of these issues and have established a policy and governance framework that seeks to deliver the highest ethical standards for our customers, suppliers, and employees.

Peter D. Atkinson

Chief Executive Officer

11<sup>th</sup> June 2026

## **Our Business**

As at 31 December 2025, Macfarlane Group PLC comprised the following legal entities which all trade within the UK:

Macfarlane Group PLC  
Macfarlane Group UK Limited  
Nelsons for Cartons & Packaging Limited  
Nottingham Recycling Limited  
GWP Group Limited  
Carters Packaging Limited  
Macfarlane Packaging Ireland Limited  
Barum & Dewar Limited  
Gottlieb Packaging Materials Limited  
A.E. Suttons Limited  
Polyformes Limited  
Allpack Packaging Supplies Limited  
Pitreavie Packaging Limited

Macfarlane Group PLC is the parent company, listed on the London Stock Exchange and is the ultimate holding company of all legal entities within the Group.



The largest entity within the Group is Macfarlane Group UK Limited (trading as Macfarlane Packaging). Combined with its subsidiary companies, Macfarlane Packaging is currently the UK market leader in the distribution of protective packaging products. The Group leverages its purchasing scale to cost-effectively source a comprehensive range of protective packaging products and adds additional value for its customers by providing independent advice on the most cost-effective and sustainable packaging solutions.



Macfarlane Group also has a Design and Manufacturing Division which utilises design, intellectual property and know-how to provide specialist protective packaging solutions to customers, protecting their high-value, fragile products.

Macfarlane Group aims to grow its business by deepening relationships with existing customers, winning new customers and through the acquisition of quality, complementary businesses.

## **Policies relating to Modern Slavery and Human Trafficking**

Macfarlane Group is committed to its social and environmental responsibilities and has zero tolerance for slavery and human trafficking. We hold ourselves and our supply chain accountable and we comply with the provisions of the Modern Slavery Act 2015.

We recognise that modern slavery is a complex issue with the potential to impact across our value chain. We therefore seek to work in partnership with our customers, suppliers and expert organisations to take progressive action now and support the development of more systematic, industry-wide solutions over the longer term.

We have a range of policies in place regarding anti-slavery and anti-trafficking. These influence decisions relating to suppliers and employees on a day-to-day basis and provides the organisation with the power to act where

any instances of non-compliance are uncovered. These policies include but are not limited to:

- Recruitment Policy
- Employee Code of Conduct
- Supplier Code of Conduct
- Whistleblowing Policy
- Human Rights Policy
- Ethical terms and conditions in Supplier Contracts
- Supplier Audits
- Diversity, Equality and Inclusion Policy
- Harassment Complaints and Investigation Policy
- Grievance and Disciplinary Policy

Our policy framework remains under continual review to help ensure it aligns with international best practice and enables us to most effectively manage these risks across the value chain.

## **Supply Chain – Risk Assessment**

Macfarlane Group works with a wide range of suppliers, the majority of which are based within the UK or European Economic Area. The Group's supply chain is primarily made up of direct third-party suppliers who supply finished products or raw materials which the Group then converts to finished packaging.

Processes have been established to evaluate human trafficking and slavery risks across the Group's supply chain from onboarding and throughout the supplier's ongoing engagement with the Group. These include but are not limited to, safety, human trafficking, child labour as well as other legal requirements.

## **Supply Chain Management and Due Diligence**

Given the numbers of suppliers across the Group, a risk-based approach is deployed to help target resource in the right areas and wherever risk is higher.

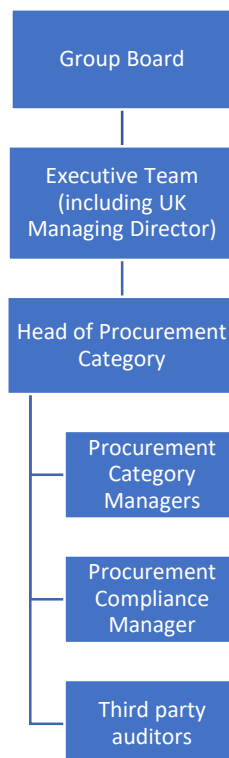
The level of assurance sought depends on the supplier criteria and assessed level of risk. Audit arrangements range from a supplier audit questionnaire, an on-site audit by Macfarlane staff, through to an external audit carried out by a professional auditing body for those suppliers that are considered to represent the highest level of risk.

Sedex (SMETA) audits remain the Group's preferred external audit partner, given the comprehensive nature of their audits and their global presence. The Sedex audits encompass all aspects of responsible business practice and were founded on the conventions of the International Labour Organisation (ILO), as well as relevant local legislation. Both the audits and their follow-ups are published on the Sedex platform and made available to the Macfarlane Group, for review.

There were no incidents of child labour, forced labour or human trafficking identified during 2025, either internally within the Group or across our value chain.

## Governance

The governance of supplier audit & risk is held by the Group Procurement team with the support of the UK Managing Director who is a member of the Group Executive. Any issues that are identified as severe are also raised with the Group Board, who have a majority of members that are independent of the management team.



The Group has recruited a Procurement Compliance Manager to oversee supply chain management, provide expert advice, support and additional dedicated resource.

The Procurement Category Management team are responsible for the audit process and onboarding of new suppliers and escalating any high-risk failures or concerns to the Procurement Head of Category who assumes responsibility for taking appropriate actions and resolution.

The Group also provides a whistleblowing service, which is independent of operational management. This service is widely communicated both internally within the Group and externally. The Group has procedures in place to protect whistleblowers, with all cases fully investigated and resolved in a timely manner.

All whistleblowing cases and their effective resolution are overseen by the Group Board.

## **Conclusion**

The Group remains committed to respecting everyone's human rights, ensuring that all individuals are treated with dignity and respect. The Group has a zero-tolerance approach to all forms of slavery and human trafficking and will continue to take measures to help ensure it is not present either directly within the organisation or across the Group's value chain.

During the year we have continued to maintain a clear policy framework and a range of risk management and assurance processes to help manage these risks.

## **Statement Approval**

This statement was approved by the Chief Executive Officer on 11<sup>th</sup> June 2026, for the financial year 1 January 2025 to 31 December 2025.

**Peter D. Atkinson**  
**Chief Executive Officer**