

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Financial year ended 30 March 2024

BACKGROUND

James Cropper plc (the “Company”) together with its subsidiaries* (collectively the “Group”) is a market leader in the development and manufacture of advanced materials and paper products.

This statement outlines the steps we have taken as a Group during the financial year ended 30 March 2024 to ensure that modern slavery and human trafficking is not taking place within any parts of our business or in its supply chains.

Modern slavery and human trafficking are violations of fundamental human rights. The offences take various forms and include slavery, servitude, forced or compulsory labour, child labour, and each involve the deprivation of a person’s liberty by another person to achieve personal or commercial gain.

We adopt a zero-tolerance approach to modern slavery offences. We acknowledge our responsibilities under the Modern Slavery Act 2015 and communicate this within our organisation and supply chains. We will not support or deal with any business known to be involved in slavery or human trafficking.

OUR BUSINESS AND SUPPLY CHAINS

Headquartered from our Burneside site in the UK, we have manufacturing operations in the UK and USA, employ over 600 people globally, and serve customers in over 50 countries worldwide.

The Group is divided into two principal businesses:

- Our Advanced Materials business works at the cutting edge of material science, creating future-focused solutions across a broad portfolio of products ranging from ultra-fine non-woven veils to electrochemical coatings for current and next-generation technologies. The business includes three manufacturing sites in the UK and one in the USA.
- Our Paper & Packaging business combines generations of craft with advanced material science to create sustainable solutions for customers including bespoke and moulded fibre luxury packaging which incorporate recycled materials. The business manufactures products from one site at our headquarters in the UK.

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To support our approach to responsible business, our ESG Working Group was refreshed in 2024 and comprises a broad range of knowledgeable and passionate individuals from across the Group. The Working Group supports the Board and Executive Committee in the delivery of strategic ESG objectives which includes ensuring we and our supply chains continue to adhere to responsible business practices.

In operating our businesses, we act with integrity and seek to implement and enforce effective systems and controls which promote trust, transparency, and accountability. Our values of Forward-Thinking, Responsible and Caring were shaped by our employees and are at the heart of everything we do; providing direction and common purpose to ensure that we do the right things and in the right way. We adopt the broadest view of value generation and are committed to supporting our stakeholders acting in an ethical, transparent, and sustainable manner.

We source across broad categories of raw materials, goods, and services from across the world linked to the development, manufacturing and supply of products and services by each of our businesses.

We source a high proportion of our goods and services from European and North American suppliers, in which regions modern slavery is not considered prevalent, but we recognise that certain goods/services and the countries from which they are sourced, may carry greater risk.

OUR POLICIES

Key to our zero-tolerance approach is ensuring that we have robust policies and procedures in place.

- MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Our Modern Slavery and Human Trafficking Policy reinforces our commitments to:

- Act ethically and with integrity in our business relationships.
- Implement and enforce systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- Keep under review our employment practices to ensure fairness.

Breaches of the Policy are regarded as misconduct, and we have a strict policy of non-retaliation against employees reporting suspected breaches. The Policy is published on our intranet site for employees to view.

- CODE OF ETHICS AND BEHAVIOURS

Our Code of Ethics and Behaviours was first issued in 2022. The Code builds upon our framework of policies and provides clear and straightforward guidance, and a single message for all our people, on a range of situations which might be encountered at work.

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The Code sets out our position of zero-tolerance on abuses of human rights in any part of our business and in our supply chains and encourages our people to speak-up when any violations are suspected. Every employee is provided with a copy of the Code on joining the Group.

- **INDEPENDENT WHISTLEBLOWING SERVICE**

In the financial year ended 30 March 2024 we launched an independent whistleblowing service in conjunction with Safecall Ltd (www.safecall.co.uk). The service is advertised across all sites and is available to all employees who can report any concerns in the workplace with confidence and anonymity. We encourage employees to speak up whenever they suspect wrongdoing, which includes suspected instances of modern slavery and human trafficking in our business or supply chains.

DUE DILIGENCE AND SUPPLIER ADHERENCE

We have systems in place which are designed to identify and minimise the risk of modern slavery and human trafficking in our business and supply chains, and to protect any individuals who report suspected violations.

A key pillar in our ESG strategy is the promotion of responsible business practices where we have identified our Supply Chain as one of our nine ESG priority areas. In the year ended 30 March 2024, our ESG Working Group undertook a review of this priority area to identify risks and opportunities together with actions to address these with a view to ensuring our suppliers operate to the same ethical and sustainable standards to which we adhere. Work in this area will continue during the current financial year, and we will endeavour to continuously enhance our approach.

Our supplier due diligence processes are subject to regular review and seek information from suppliers concerning their practices and approach to social responsibility considerations such as slavery to enable us to make procurement decisions. We also publish a Supplier Code of Conduct containing ethical standards we expect to be met and expect all key suppliers to confirm their adherence to this.

Regular engagement with our suppliers is important to our business: this includes site visits from time to time. Such visits (together with other contact with suppliers) provide opportunities for us to understand their business model, help build sustainable and transparent relationships, and to evaluate their processes and practices in a manner to our own SCOC and policies.

The Company will not undertake business with any third parties including suppliers where concerns arise and will accordingly report such circumstances to the relevant authority.

TRAINING

To raise awareness and best ensure we are placed to identify occurrences (or the risk) of modern slavery, customer facing employees are provided with training in connection with our supplier due diligence processes, and we provide regular training to all employees on our approach to business ethics.

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ended 30 March 2024. It was approved by the Board on 31 July 2024.

Steve Adams

Chief Executive Officer

Date: 31 July 2024

*For the purposes of this statement subsidiaries of James Cropper plc include:
James Cropper Speciality Papers Limited (England & Wales)
James Cropper Converting Limited (England & Wales)
Technical Fibre Products Limited (England & Wales)