

# Modern Slavery and Human Trafficking Statement

## Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31 December 2022.

Cartiere Carrara Spa is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

## Organisational structure

Cartiere Carrara Spa is the parent company of the Cartiere Carrara Spa group and has business operations in Italy and United Kingdom.

We operate in the manufacture and distribution of tissue paper sector. The nature of our supply chains is as follows: We work with a number of key direct suppliers, who provide us with pulp from North and South America and Europe, specialized plant and operating software from Italy, local energy and utilities for our mills in Italy, and European transport services.

For more information about the Company, please visit our website: <https://cartierecarrara.com/en/>.

## Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- **Recruitment and selection policy** - Our recruitment and selection policy to prevent modern slavery existing within our own organization and ensures fairness, equity and transparency in how we select and compensate employees.

- Whistleblowing policy - Our whistleblowing and complaints policies seeks to prevent modern slavery by ensuring all individuals including staff, suppliers, partners, grantees, or contacts know how to securely express a concern they have regarding the Impetus's conduct or that of our employees.
- Procurement policy - As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have reviewed our procurement policies and procedures to enhance our due diligence practices and conducted a review of our major existing suppliers to understand their commitment to preventing slavery and human trafficking to ensure a commitment to complying with the Modern Slavery Act 2015 is included and continue to conduct appropriate and proportionate due diligence checks related to slavery and human trafficking on all new major suppliers and will ensure they agree to terms and conditions that require them to comply with the Modern Slavery Act 2015 and, where applicable, review their own Modern Slaver Statement.
- Safeguarding policy - Our safeguarding policy seeks to prevent modern day slavery by ensuring children are not neglected in any way and are protected and mechanisms are in place to report any form of abuse.

We make sure our suppliers are aware of our policies and adhere to the same standards.

## Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

- The risk profile of suppliers is assessed taking into account Transparency International Index on corruption perception.

## Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because our suppliers are selected on the basis that they can provide FSC and PEFC pulp certification, standards that require regular evaluation regarding human rights and the chain of custody of forestry.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.



Massimo Carrara,  
Executive Chairman  
Cartiere Carrara SpA

Date, 31 August 2023