



Modern Slavery Statement for the financial year 2018

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and constitutes the Kite Group's Modern Slavery Statement for the financial year ending 31 December 2018. It sets out the steps that the Kite Group have taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Kite Packaging Group Holdings Limited and its subsidiary undertakings are the Kite Group. The subsidiary Kite Packaging Limited ('Kite') conducts the majority of the Group's activities. One of the Group's unique features is that we are employee-owned, and all our employees are invited to participate as shareholders.

Our business, structure and supply chains

Kite operates 7 Regional Distribution Centres (RDC) on a geographical territory basis providing service & solutions to large customers who generally require mainly customer-specific packaging products and added-value services.

Kite also sells and supplies a comprehensive range of standard packaging products to B2B customer via its website – kitepackaging.co.uk and fulfils orders from its National Distribution Centre (NDC).

With over 290 employees Kite operates from modern sites across the UK. Most of the product sold by Kite is sourced and manufactured in the UK, with the balance imported from an international supplier base.

The Kite Group has zero tolerance for modern slavery and human trafficking and is committed to the principles of the Modern Slavery Act 2015. As an equal-opportunities employer, Kite is committed to creating and ensuring a non-discriminatory and respectful working environment for its staff. All employment of staff by Kite is in the UK and is conducted in terms of UK law with regard to employment and health & safety.

Our policies

Kite has reviewed and upgraded the following policies to ensure that we influence decisions around suppliers and employees on a day to day basis:

- Environmental Policy
- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Health and Safety Policy
- Employee Handbook
- Code of Ethics
- Supplier Code of Conduct

an employee-owned business

These policies and others are reviewed annually and with reference to legislative changes.

Due diligence process

Kite only works with reputable suppliers, most of whom have been partners for many years and Kite takes responsibility for ensuring its supply chain is free of slave labour.

As part of Kite's initiative to identify and mitigate risk we have mapped our suppliers and performed a risk assessment to identify those with a higher risk of modern slavery in their business or supply chain. All preferred suppliers are required to sign Kite's Supplier Code of Conduct which includes a statement of compliance with the Modern Slavery Act 2015.

Members of Kite's senior management also, where appropriate and practical, visit suppliers' offices, both in the UK and abroad from time to time. This helps us to become familiar with how they operate and what safeguards they have in place to reduce, remove and prevent the use of slave or forced labour in their organisations and their supply chains.

With regard to international suppliers Kite requires them to complete a self-evaluation form which will on a rotational basis be followed up by an audit.

To ensure an appropriate level of understanding of the risks of modern slavery and human trafficking in our supply chains, ongoing training is provided to Kite staff as relevant.

Our effectiveness in eliminating modern slavery

Heightened awareness within our product purchasing process and our supply chains has been achieved by ensuring that relevant suppliers have acknowledged and sign up to our Supplier Code of Conduct, which includes a statement of compliance with the Modern Slavery Act 2015.

Dr Bruce McInnes
Director – Kite Packaging Group Holdings Limited
Director – Kite Packaging Group Limited
Director – Kite Packaging Limited

an employee-owned business