



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2022

1. INTRODUCTION

This statement is published in accordance with the UK Modern Slavery Act and sets out the steps taken by Euro Pool System International B.V. (Euro Pool Group), the reporting entity. Euro Pool Group does not accept modern slavery and human trafficking in any way or form and also wants to prevent it from happening in any of its business or supply chains.

This statement applies to all Euro Pool Group subsidiaries for the financial year 2022.

2. EURO POOL GROUP'S BUSINESS OPERATIONS AND SUPPLY CHAINS

Euro Pool Group is composed of two divisions, being the EPS - Euro Pool System division (Euro Pool System) and the LPR – La Palette Rouge division (La Palette Rouge). Euro Pool System was founded in 1992 by the cooperative auctions in Belgium, Germany, and the Netherlands. LPR was established in 1992 and was acquired by Euro Pool Group in 2011.

Euro Pool Group is the largest logistics service provider for reusable standard packaging in Europe. With a solid position in Europe and an overall presence in 18 European countries and operations in more than 30 countries, Euro Pool Group's 1,200+ employees provide value added logistic services to retailers, FMCG companies, fruit & vegetable producers, and other partners in the (fresh) food and non-food supply chains throughout Europe. By sharing the benefits of reusable standard packaging solutions with its customers and stakeholders, Euro Pool Group contributes to the transition towards a circular economy.

3. RESPONSIBLE BUSINESS

Euro Pool Group conducts its business in line with its values and the highest possible standards that exist within the European Pooling Industry. It supports and respects internationally recognized human rights and believes in respectful and honest business relations, therefore Euro Pool Group does not accept modern slavery and human trafficking in any way or form and also wants to prevent it from happening in any of its business or supply chains.

Euro Pool Group developed over the years a framework of internal policies and guidelines to promote responsible entrepreneurship and to prevent, detect and respond to (allegations of) unethical or illegal activity Euro Pool Group has furthermore taken steps to prevent modern slavery in its business operations:

- **Code of conduct:** The Code of Conduct of Euro Pool Group forms the core of the compliance framework of Euro Pool Group and is supplemented with policies and guidelines which address specific compliance related topics. The Code of Conduct sets out binding rules and guidelines how employees of, and other people working for, Euro Pool Group and its affiliates should conduct business: in a responsible manner. The Code of Conduct explicitly sets out that Euro Pool Group conducts its business with integrity and respect of human rights and that it respects and supports



internationally recognized human rights for all stakeholders. Euro Pool Group has zero-tolerance for child labour and forced labour and contributes to the elimination of child labour and forced labour wherever it can. Euro Pool Group expects all its business partners to do the same. Euro Pool Group's Code of Conduct is distributed among its employees and can be accessed through its intranet.

- **EPG Speak-Up/Whistleblower policy:** Euro Pool Group encourages all its employees, and other people working for, Euro Pool Group, to report any concerns related to unethical or illegal behaviour. Euro Pool Group's whistleblowing procedure is designed to make it easy for such persons to report concerns, without fear of retaliation. Employees who have concerns can use our confidential / anonymous Speak Up line, operated by an external service provider.
- **EPG Third Party Whistleblower Policy:** Euro Pool Group encourages all suppliers, service providers, contractors and sub-contractors and their respective employees to report to Euro Pool Group any suspected or known improper conduct.
- **Engagement of Suppliers:** Euro Pool Group is committed to conduct its business in a responsible manner and expects from its suppliers to do the same. The (standard) purchase terms and conditions of Euro Pool Group and individual supply agreements concluded with suppliers and service providers (will) require suppliers and service providers to comply with all applicable laws and regulations, including laws prohibiting modern slavery. Euro Pool Group's suppliers will need to uphold and actively pursue a zero-tolerance policy towards child labour and forced labour.
- **Risk assessment:** Euro Pool Group has included the risk of modern slavery and human trafficking in its operations in its annual risks assessment (pursuant to the COSO Enterprise Risk Management model), thereby taking into account Euro Pool Group's risk mitigating measures, that will be further implemented throughout the organisation (see below "*Future steps*").

4. TRAINING

Euro Pool Group expects its employees to act in line with its Code of Conduct, which is available in English and 11 other languages on Euro Pool Group's intranet. In view hereof, as per the start of an individual's employment or engagement with Euro Pool Group, all employees and officers are required to acknowledge receipt of and to have read the Code of Conduct. Furthermore, employees are periodically trained on the corporate values and business principles of Euro Pool Group, including by means of e-learning modules on, amongst others, its Speak-Up/Whistleblower policy.

5. FUTURE STEPS

Euro Pool Group is constantly reviewing its compliance and contractual framework to ensure compliance with applicable laws and regulations and to prevent risks of modern slavery. To the best of its knowledge, there is no modern slavery or human trafficking taking place in its supply chains.

Risk of modern slavery and human trafficking in its operations is included in Euro Pool Group's annual risks



assessment (pursuant to the COSO Enterprise Risk Management model), thereby taking into account Euro Pool Group's risk mitigating measures to be further implemented throughout the organisation.

As part of the identified risk mitigating measures, Euro Pool Group has started to develop and implement in 2022 a Supplier Code of Conduct (which roll-out is ongoing), pursuant to which it will reiterate towards its suppliers their obligation to comply with all applicable laws and regulations, including laws prohibiting modern slavery and human trafficking.

Euro Pool Group has also started a pilot on supply chain due diligence by performing independent third-party social audits on a selection of suppliers, which include in particular criteria on modern slavery.

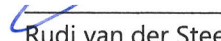
Euro Pool Group will furthermore in its training program, both for new hires as well as for each existing employees, increase the awareness about potential risks of modern slavery and human trafficking.

Furthermore, Euro Pool Group will require its employees who are involved in the selection process of suppliers, to participate from time to time to a training on ethical procurement and supply.

6. BOARD APPROVAL

This statement was approved by Euro Pool Group's board of directors on 30 June 2023.


Gert Johan Scheringa


Rudi van der Steeg