

## Modern Slavery Statement

Statement January 2025

### Introduction

- This statement outlines Fourstones Paper Mill Co Ltds (Fourstones) understanding and acknowledgement of the Modern Slavery Act 2015. At Fourstones we strive to ensure ethical practices are followed and hold honesty and integrity as core business values.
- This is Fourstones Second annual review.

### Organisation Structure

- Fourstones operates over 3 sites based in the UK, using vertically integrated operations to manufacture and sell FSC® tissue parent reels and FSC® finished paper hygiene products. Fourstones also purchases and sells paper hygiene products from external suppliers.

### Policies & Compliance

- A robust Ethics policy has been created and implemented by Fourstones highlighting our approach to modern slavery risks in our operations.
- This document is also used during Fourstones FSC® chain of custody audits undertaken by a credible UK third party. It is noted that the document exceeds the FSC® labour requirements, an area of FSC® that ensures certificate holders meet both international and local legislation.
- Fourstones ethical policy is available to all staff in an easy to access public area and does not need to be requested. External stakeholders can freely request a copy of Fourstones ethical policy. Key ethical stances regarding modern slavery and trafficking within the policy can be found below;
  - o Employment is freely chosen.
  - o Working conditions are safe and hygienic.
  - o Child labour shall not be used.
  - o Pay is not below local minimum wages.
  - o Working hours are not excessive.
  - o No discrimination is practised.
  - o No harsh or inhumane treatment is allowed.

## Supply Chain Risk Assessment

- Fourstones selection of critical raw material upstream suppliers consist of reputable FSC® certified paper & pulp suppliers as well as UK based wastepaper suppliers.
- Tissue Parent Reels & Pulp: All tissue parent reels and Pulp suppliers used by Fourstones must be FSC® certified and only FSC® certified paper and pulp is to be purchased from the suppliers. This ensures that FSC® Labour requirements are followed.
- Wastepaper Suppliers: All wastepaper used by Fourstones must be sourced within the UK and must be delivered using European Waste Codes to ensure the paper waste is clearly identified and sourced through credible waste suppliers following strict UK legislation.
- Other key suppliers are identified by Fourstones as those providing goods or services with a value over £100,000 annually.
- Fourstones conducts supplier risk assessments annually, focusing on critical and key suppliers.
- Suppliers are categorised according to the risk profile of the countries in which they operate, using independent benchmarks such as the Walk Free Global Slavery Index (<https://www.walkfree.org/global-slavery-index/>).
- Where higher risk is identified, additional due diligence is carried out, including supplier questionnaires and requests for supporting evidence of compliance.
- Fourstones monitors completion rates of supplier assessments and will reflect on overall trends and improvements in each annual Modern Slavery Statement.

## Training & Awareness

- Annual training will be provided to Fourstones staff who are involved in procurement each January, covering compliance with the Modern Slavery Act 2015 and supplier risk assessments.
- All Fourstones staff will be reminded to review the Fourstones ethics policy annually, ensuring they maintain up to date information on how to identify and report potential slavery within the workplace.

## Our Commitment

- We will not support any business knowingly involved in slavery, child labour or human trafficking.
- We will carry out annual risk assessments and audits within our supply chain.
- We will raise awareness by training our employees.
- We will reflect annually on the steps we have put in place to combat modern slavery and human trafficking.

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This statement has been approved by the company's Managing Director who will review and update it annually.

### SIGNED

**Peter Duxbury**

Managing Director of Fourstones Paper Mill Co Ltd

January 2025