

Panini Anti-Slavery and Human Trafficking Policy

Introduction

This policy sets out our expectations and commitments in accordance with the Modern Slavery Act 2015.

Panini UK Ltd is a fully owned subsidiary of the Panini Group, a worldwide leader in publishing and collectables.

We, Panini Group, have zero tolerance for slavery and human trafficking in any part of our business, including our supply chains. We have a number of policies in place to ensure all our employees have the right to work and are paid fairly, that we act with integrity and ethically, and that we have effective measures in place to ensure slavery is not present anywhere in our business or supply chain.

This includes our Code of Ethics/ recruitment policy, which encompasses, promotion, training, performance management and reward. Our principles of fair treatment and respect are also applied to our relationships with customers, suppliers, contractors, and other stakeholders.

Policy statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Responsibility for the policy

The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Panini Group Human Resources Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Compliance with the policy

All our employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

They must notify the Panini Group Human Resources Director (ghrd@panini.it) as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

They are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If they believe or suspect a breach of this policy has occurred or that it may occur they must notify the Panini Group Human Resources Director as soon as possible.

If they are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the Panini Group Human Resources Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform the Group Human Resources Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Panini Employee Handbook.

Due Diligence for Slavery and Human Trafficking

As part of Panini due diligence processes, we identify and mitigate risk as follows;

- We identify and assess potential risk areas in our business and our supply chains.
- Where practical, we mitigate the risk of slavery and human trafficking occurring in our supply chains.
- We monitor potential risk areas in our supply chains.
- We protect whistle blowers.
- We ensure a high level of understanding of the risks of modern slavery and human trafficking in our business by providing training to all relevant staff.
- When incidents of Modern Slavery are identified in our supply chain, we make specific enquiries of our stakeholders, partners and suppliers.

Communication and awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.