



# Modern Slavery & Human Trafficking Statement

This statement covers the period 1 January 2023 – 31 December 2023, was approved by the Board of Bunzl plc on 24 April 2024 and has been signed on its behalf by Frank van Zanten, Chief Executive Officer. This statement is published on the Bunzl plc website and a link to the statement is included on the websites of those Bunzl subsidiaries that are required by the UK Modern Slavery Act 2015 to publish an annual statement on modern slavery.

April 2024





## Modern Slavery and Human Trafficking Statement 2023

I am pleased to share Bunzl's Modern Slavery and Human Trafficking Statement for 2023. It sets out the steps that we are taking to ensure, as far as possible, that slavery and human trafficking are not taking place in our supply chain or in any part of our business.

More than 50 million people worldwide are estimated to be living in slavery, with nearly 28 million of those in forced labour. With global trade so extensive and supply chains stretching across every corner of the planet, businesses are increasingly responsible for ensuring sourcing is ethical and lawful.

We are a global company operating across more than 30 countries and with a global supply chain. The impacts of our business go far beyond our people, premises and vehicles and so do our obligations. We are committed to working to eliminate any occurrence of modern slavery from our operations and our supply chain.

We train our employees and raise awareness of this important issue across our businesses. This helps our employees, regardless of their roles, to recognise and understand potential modern slavery issues and take appropriate action.

Our Global Supply Chain Solutions team in Shanghai is uniquely positioned to give us a thorough level of oversight of our high-risk regions in our supply chain. This team ensures that our suppliers from Asia, the Group's most significant high-risk sourcing region, as well as from other high-risk regions are subject to frequent and stringent social risk audits. In 2023 we performed more than one thousand audits and assessments. We continue to expand our audit programme and are fully on track to achieve our long-term target to ensure that 90% of our spend on products from all high-risk regions across the world will be sourced from assessed and compliant suppliers by 2025.

**Frank van Zanten**  
Chief Executive Officer

24 April 2024

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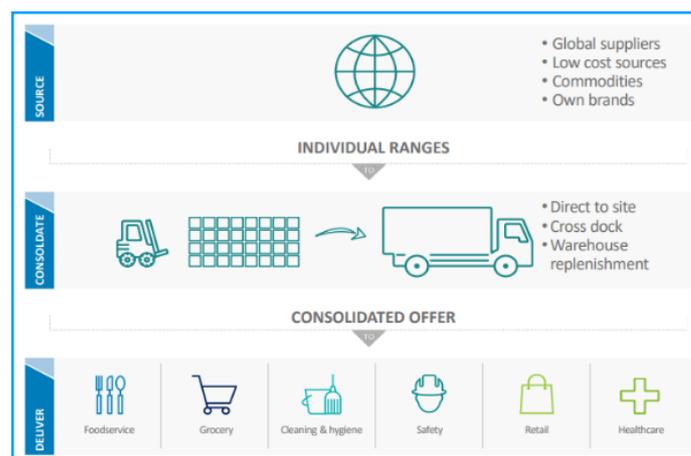
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# About us, our operations and our supply chain

Bunzl is a specialist international distribution and services Group with operations across the Americas, Europe, Asia Pacific and the UK & Ireland. We support businesses all over the world by sourcing, consolidating and delivering a wide range of non-food consumable products across a variety of market sectors including foodservice, grocery, safety, cleaning & hygiene, retail and healthcare.

Key statistics (2023):

- £11.8 billion revenue
- Employing c. 24,500 people
- Operating in 33 countries globally
- More than 10,000 suppliers globally, covering over 70 countries
- Circa 150 operating companies
- Core market sectors: Foodservice, Grocery, Cleaning & Hygiene, Safety, Retail and Healthcare



We generally do not manufacture any of the products we supply and our supply chain is both extensive (numbering thousands of suppliers) and dynamic as we respond to expanding customer requirements. The vast majority of the products we sell are sourced locally by our businesses but many products are sourced elsewhere if it is appropriate to do so.

Further details on the Group can be found in our [Annual Report](#) or on our website – [www.bunzl.com](http://www.bunzl.com)

## Our commitment

**Modern slavery is a global issue and requires global action. As an international business we are wholly committed to eliminating modern slavery practices and respecting human rights across both our own operations and our supply chain.**

We take appropriate action to ensure that all our employees understand our policy of eliminating forced labour, child labour and human trafficking. We expect our suppliers to meet or exceed local legislative requirements and applicable international requirements for workers' welfare and conditions of employment, such as those set by the International Labour Organization ('ILO') and the Ethical Trading Initiative ('ETI'). We aim to ensure that our suppliers apply these standards within their operations and their own supply chains.

## Bunzl's modern slavery and human trafficking risks

### Risks in our direct operations

The majority of our businesses are based in North America, Europe and Australasia and are involved solely in the procurement, consolidation and supply of manufactured goods. In our view, the profile of our operations in terms of locations and roles therefore means that the risks of modern slavery are low. However, because of our global footprint and diversity of sectors, we know that human rights abuses may exist in any market in which we operate. Such issues may involve our own workers as well as agency workers and other types of sub-contracted labour. All Bunzl companies

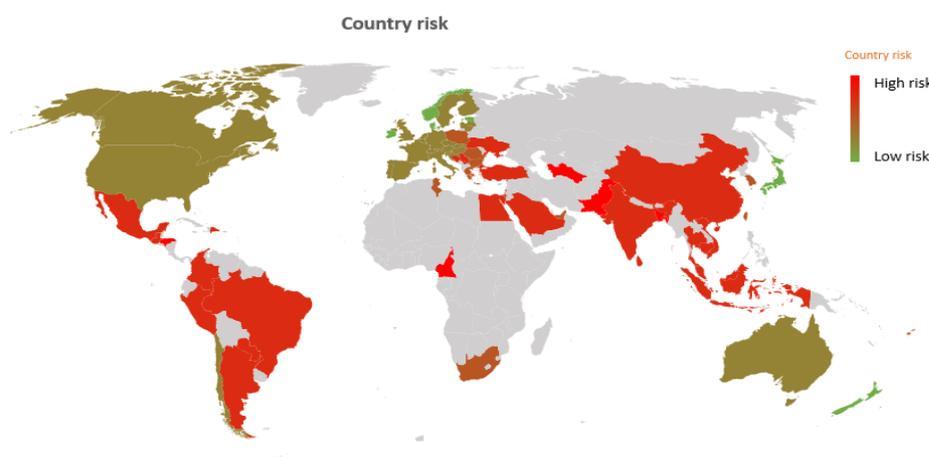
have developed and implemented policies and procedures in line with the UN Universal Declaration of Human Rights, local legislative requirements and Group HR policies with a view to ensuring that our own people, agency workers and other sub-contracted labour are treated fairly and equally.

### Risks in our supply chain

In every country and sector where we buy goods and services, there are people working to extract and grow raw materials, to manufacture goods and to pack and ship them to our businesses around the world. Any global supply chain carries social risk. The majority of our suppliers are based close to our operating companies. A relatively small proportion of our operating companies are based in countries that have a higher risk of modern slavery issues. We do also import products from other areas, primarily south-east Asia, where we consider the potential risks of forced or child labour and other modern slavery issues to be higher.

We periodically complete an external risk assessment of our supplier base to establish social risks in our worldwide supply chain. This allows us to focus our attention and resources on the areas of greatest exposure to risk. For the risk assessment, we have partnered with the Non-Governmental Organisation (NGO) Stop the Traffick who have applied their methodology to rank the inherent modern slavery and human rights risks in our supply chain. This work was based on a combination of the sourcing country and market sector applicable to the products and services being procured.

The vast majority of Bunzl's direct suppliers are based in countries with comparatively low levels of social risk. Examples of supplier countries with high or very high risk are China, India, Malaysia, Indonesia, Brazil, Mexico and Turkey.



The sectors with high or very high risks are manufacture of textile products and manufacture of leather products. These risks can occur in high-risk countries but also in various low risk countries where we source those products such as the USA, the UK and France. While products in the textiles and leather sectors are the highest ranked for modern slavery risks, our spend in these sectors is relatively low and, as a result, the total direct risk in these sectors is comparatively lower than in others such as rubber, plastics and pulp and paper where our spend is relatively high.

With more individuals migrating now than at any point in the last fifty years due to conflict, natural disasters or to simply seek employment, the risk of exploitation is increasing and the most vulnerable (women, children and migrants) will be disproportionately affected. In recognition of this situation, we will work with an expert, independent body to re-assess our supply chain risks during 2024.

In addition to periodic global social risk-assessment, our NGO partner Stop the Traffick produces a monthly adverse media report that summarises known modern slavery issues, media articles and regulatory action taken against Bunzl suppliers. This helps us to keep abreast of any emerging modern slavery issues in our supply chain. More details around our risk mitigation strategy can be found in the Managing our supply chains section of this statement.

## Policies in relation to slavery and human trafficking

**Bunzl adheres to a comprehensive suite of Corporate Responsibility ('CR') policies and standards. Those policies and standards reflect the UN Universal Declaration of Human Rights and require compliance with internationally recognised requirements for workers' welfare and conditions of employment as defined by the ILO or the ETI which specifically prohibit forced labour i.e. slavery and human trafficking, unfair wages and**

**working hours, discrimination and denying freedom of association. The key CR policies are summarised below. The policies are reviewed by the Board at least every three years (more often if new legislation, requirements or guidance emerges) to ensure that they remain appropriate.**

The **Bunzl code of conduct** defines the principles and standards that we expect our employees to understand and adhere to. It is never acceptable for our employees to deviate from the code to achieve a business objective. The code is communicated in local language to our employees worldwide.

Our Ethical sourcing policy ensures that Bunzl sources products in an ethical and consistent manner. The policy sets out the principles of our supplier evaluation and auditing programme, including the Supplier code of conduct. More information is provided in the Managing our supply chains section of this statement.

Our Speak Up policy sets out our internal grievance reporting procedures. We expect our employees to make management aware of all non-compliances to our code of conduct, any applicable law and/or company policies. The Speak Up posters are displayed on notice boards in each facility including information on how to report matters confidentially and anonymously. None of the calls received through the Speak Up line in 2023 related to modern slavery.

Our **Diversity, Equity and Inclusion policy** sets out the principles of our employment procedures and practices, which are based on a principle to treat people fairly and equally and opposing all forms of discrimination. All businesses develop and implement local HR policies and procedures that support and demonstrate the principles of the global policy.

Our policies can be found in the [Policies Hub section](#) of the Bunzl plc website.

### Monitoring our policies

Implementation of our policies is monitored by a team of Human Resources professionals and is reviewed by our internal auditors who periodically visit Bunzl locations and audit the operations to ensure that they meet the relevant standards. In addition to this, every business is required to complete an annual self-assessment process. The self-assessment is a key element of monitoring the implementation and effectiveness of our modern slavery policies, with key areas of scrutiny being employee training, communicating the employee code of conduct to employees, the communication of the supplier code of conduct to suppliers and the auditing process.

Supply chain monitoring, such as the execution and follow up to social risk audits, is undertaken by our local procurement professionals and our Quality Control/Quality Assurance department based in Shanghai. The effectiveness of our audit programme and ethical sourcing policies are monitored by our supply chain subcommittee (see 'Governance' section), with regular reports to the Group Sustainability Committee.

Regular reports are submitted to, and reviewed by, the Bunzl plc Board of Directors summarising the audits that have been carried out, the material issues that have been identified from such audits and the follow-up actions taken to address such issues.

## Governance

**Although we are a decentralised Group which gives management autonomy to take decisions relating to our operations locally, we have a clear governance framework that allows the Board and the Executive Committee to lead the Company in the right direction. Our Chief Executive Officer and members of the Executive Committee have overarching accountability for the standards in our operations and supply chain and are responsible to the plc Board. The Audit Committee (a sub-committee of the Board) also plays a role in ensuring that an adequate risk management framework is in place. Day to day management of the business, including procurement, is devolved to Business Area Heads in each of our operational geographies.**

Through our governance meetings we ensure that we adequately and pro-actively address the key sustainability and Corporate Responsibility trends facing our business. The Board Sustainability Committee provides an oversight function to the Group Sustainability Committee and comprises all of the independent non-executive directors and the Chairman of the Board, who also chairs the committee.

Our Group Sustainability Committee, chaired by the Chief Executive Officer, sets and oversees implementation of all policies and programmes in the whole value chain including those for social risk matters related to our operations and our supply chain.

The Group Sustainability Committee is supported by a supply chain sub-committee, comprising the procurement leads in all business areas, which is responsible for developing processes and procedures to assess opportunities and mitigate risks within our global supply chains, ensuring regulatory compliance as a minimum. The



subcommittee focuses on providing transparency on social risks in our global supply chain and coordinating and overseeing actions to mitigate those risks.

## Employee Training

One of our focus areas continues to be on training our people and raising awareness of modern slavery. All of our senior employees, including managers, procurement and sales executives, are required to complete the corporate responsibility e-learning modules on modern slavery risks. The training helps our employees to understand and recognise social risk issues that might occur in our supply chain and informs them of the appropriate actions that should be taken if such issues materialise. All businesses are required to ensure that new and existing employees view the training materials applicable to their role, including the modern slavery risk module.

The following training modules are mandatory:

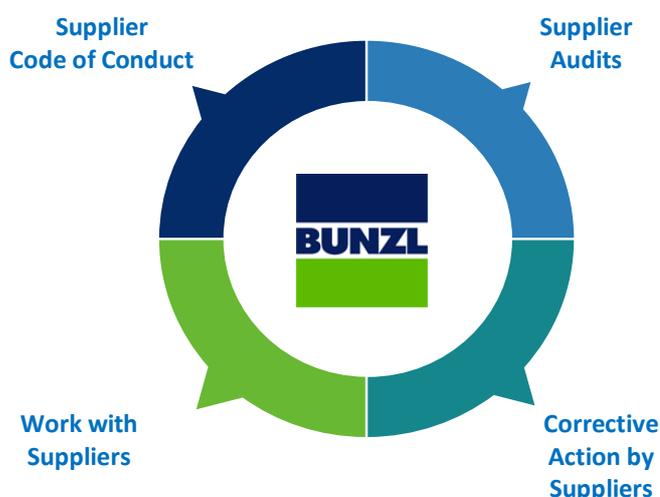
- Code of conduct.
- Customers and suppliers.
- Speak up.
- Combatting modern slavery.

The Combatting modern slavery training helps employees to be aware of, and recognise modern slavery issues. It explains Bunzl risk assessment and risk mitigation programmes. It also provides information on what to do if an employee suspects that modern slavery is or may be taking place.

In addition to the e-learning modules, we have developed social risk training materials aimed at further increasing our businesses' awareness of the risks of modern slavery and our programmes to mitigate these risks. Our Global Sourcing team comprises professional auditors who are trained in identifying and reporting social risks.

## Managing our supply chains

We use the results of our supply chain risk assessment (referred to in the 'Bunzl's modern slavery and human trafficking risks' section of this statement) to continuously enhance the mitigation of social risks in our supply chain. We rank our sourcing countries by risk level and ensure that effective mitigation of slavery and human trafficking risks is in place, appropriate to the risk level. Our due diligence processes in relation to these risks in our supply chain are centred around four elements:



### Work with suppliers / supplier training

We work with our suppliers to help them prevent social risk issues arising in the first place as well as addressing them if they are found through our audit programme. We believe that building relationships and trust with suppliers is critical when it comes to preventing and identifying incidences of modern slavery. We regularly organise supplier conferences,

predominantly in Southeast Asia, to showcase examples of good practice and build awareness of social compliance issues.

These events usually take one or two days and consist of lectures and various interactive workshops during which best practices and challenges are discussed in an open and informal dialogue. In addition to collective training events, we also engage with suppliers directly. Direct 1-on-1 training has proven to be a very effective way to help suppliers make very quick progress with the added benefit of creating a strong relationship with those suppliers.

A supplier training event was organised in Thailand in August 2023. A total of 29 Vietnamese suppliers attended the meeting, covering a diverse range of product groups. The training helped these suppliers (a mixture of existing, new and potential vendors) understand Bunzl's requirements in both social accountability and quality management. One of the key topics of the conference was the risk of forced labour issues, as we have found such issues in recent audits in Thailand. Various workshops were held to increase awareness of the topic and help supplier identify solutions and best practices to mitigate the risk. The feedback from suppliers was very positive. In 2024, we are planning 3 supplier conferences (two in China, one in Malaysia).

### Supplier code of conduct

Our requirements relating to modern slavery risks are established in our supplier code of conduct. We expect all suppliers to adhere to our supplier code of conduct as a condition of doing business with us. The supplier code is available in more than 15 languages and is actively communicated by our businesses to our suppliers, particularly in those countries with increased risk of modern slavery and other social risks. We send the Supplier code of conduct to all of our suppliers. By trading with Bunzl, we expect suppliers to accept and apply our standards and also to procure compliance by their suppliers and subcontractors. Suppliers in high-risk countries receive the code every year and we require a signature to confirm acknowledgement and adherence to the code. We are increasingly switching to digital platforms to facilitate the monitoring of sign-off processes.

The key elements of the Supplier code of conduct are:

- We require compliance with internationally recognised minimum requirements for workers' welfare and conditions of employment as defined by the International Labour Organization or the Ethical Trading Initiative, which specifically prohibit child labour, forced labour (including slavery and human trafficking), unfair wages and working hours, discrimination and denying freedom of association.
- We expect our suppliers to be honest in their dealings with others, obeying all applicable laws and corresponding regulations governing fraud and anti-bribery and corruption.

### Supplier assessments and audits

We have an assurance and quality control team based in Shanghai which performs regular audits of our direct suppliers in Asia to ensure that they meet our standards in relation to human rights and conditions of work. The audits cover various aspects including child, forced or bonded labour, disciplinary practices, management of homeworkers and foreign migrant workers, freedom of association, wages, working hours and health & safety.

Our standard audits are conducted over one day (usually with one auditor, but occasionally two if the supplier is over a given size) and enhanced audits take place over two working days. The type of audit (standard or enhanced) is determined by a review of factors such as spend and number of employees at the supplier's location.

			
<p><b>1. Policy review</b> Review of key policies and procedures such as the Anti Bribery &amp; Corruption document and Supplier Code of Conduct.</p>	<p><b>2. Factory tour</b> Site to identify potential points to be covered further in interviews and document checks.</p>	<p><b>3. Employee interviews</b> Interview with employees, selected at random, about their freedom of movement, salary, days and hours worked, etc.</p>	<p><b>4. Document review</b> Review of documents related to employees working hours, salaries paid, etc.</p>

We continually update our audit guidelines to ensure they represent best practice and cover all the relevant risks. Our auditing standards are consistent with external best practice. An independent external review by Elevate, an industry

leader in sustainability and supply chain services, confirmed that the Bunzl Auditing Checklist has the same content and is equivalent to the SMETA Checklist, one of the leading external auditing standards available.

**A summary of the risk areas in our audit is as follows:**

Risk area	Key audit points	Countries with increased risk
Child labour and young worker	<ul style="list-style-type: none"> <li>• Completeness of employee rosters and registration of young workers.</li> <li>• Policies and observed practices against child labour and on young workers, including a review of young workers' work requirements.</li> </ul>	India
Forced labour and disciplinary practices	<ul style="list-style-type: none"> <li>• Policies and observed practices against forced labour, physical punishment, discrimination, harassment &amp; abuse.</li> <li>• Payment of deposits or debts to supplier or recruitment agency.</li> <li>• Any non-voluntary overtime work, ID card or passport confiscation or any physical containment of workers.</li> </ul>	Malaysia, Taiwan, Thailand, China
Migrant workers	<ul style="list-style-type: none"> <li>• Recruitment practices, employment and living conditions.</li> <li>• Confiscation of the ID card or passport/legal certificate to work of foreign migrant worker.</li> </ul>	Malaysia, Taiwan
Freedom of Association	<ul style="list-style-type: none"> <li>• Right of employees to join or form trade unions and to bargain collectively.</li> <li>• Facilitation of means for independent and free association and bargaining, when right to freedom of association and collective bargaining is restricted under law.</li> </ul>	
Wages and working hours	<ul style="list-style-type: none"> <li>• Timely payment of normal and overtime wages and meeting minimum wage standard, no illegal or unreasonable wage deductions.</li> <li>• Sufficient rest hours and days, daily and monthly overtime controlled within legal requirements.</li> </ul>	China, India, Pakistan
Fire safety	<ul style="list-style-type: none"> <li>• Adequacy, availability and maintenance of fire extinguishers, fire alarm, emergency lights, emergency exits, training and evacuation plans in workers' language.</li> <li>• Dormitory located in a building separated from the workshops and warehouses.</li> </ul>	
Safety and environment	<ul style="list-style-type: none"> <li>• Machine guarding, warning labels and procedures to operate equipment.</li> <li>• Protection from exposure to hazardous materials and provision of personal protective equipment.</li> </ul>	

In 2023 we carried out 1,022 (2022: 930) audits of suppliers. If our audits identify non-conformities against our standard (for example, instances of forced labour or overtime or wage violations) we work to resolve these quickly through in-depth engagement with the supplier. If resolution is not possible within a reasonable time frame (usually six months) then we terminate the relationship. In 2023, we terminated relationships with 10 suppliers who failed to make enough progress.

Where our ethical auditing teams have been unable to physically visit manufacturing sites, due to lockdowns and travel restrictions, they have used several remote auditing tools to ensure engagement on this important subject is maintained and that suppliers underwent the same level of screening despite the restrictions. The number of video audits has reduced significantly in 2023 as Covid-related restrictions have been lifted throughout Asia and other high-risk areas. No video audits are planned in 2024.

In our supplier risk assessment work we place primary focus on the inherent modern slavery risks in the countries that we source our products from (see Category A below for examples). However, we are aware that lower risk countries can contain industry sectors with an increased risk of modern slavery issues (see Category B below for examples and our approach to mitigation). The table below provides an overview of how we categorise the modern slavery risks associated with our suppliers and the risk mitigation we apply.

Category	Description	Countries & product sectors	Risk mitigation
Category A (low overall spend)	Suppliers operating in (very) high risk countries regardless of product risk sector. Our responsible sourcing target to 2025 covers this category.	Most Asian countries. Key countries outside of Asia are Brazil, Turkey, Mexico, Poland and Israel.	Standard or enhanced Bunzl audit process in Asia. Risk-based assessment and audit process outside Asia. Type of audit (standard or enhanced) to be determined by product risk sector and other leverage factors such as spend and number of employees at supplier location.
Category B (low overall spend)	Suppliers operating in lower risk countries but operating in a very high or high product risk sector, for example: <ul style="list-style-type: none"> <li>• Manufacturing of wearing apparel</li> <li>• Manufacturing of textiles</li> <li>• Manufacture of leather products</li> </ul>	In various countries such as USA, UK and France.	Similar assessment and auditing techniques as above but targeting specific sectors in these countries. These will be conducted at a lower frequency or by using proactive spot checks.
Category C (high overall spend)	Suppliers operating in lower risk countries and operating in lower risk product sectors. Lower risk product sectors: <ul style="list-style-type: none"> <li>• Manufacture of rubber and plastic products</li> <li>• Manufacture of paper and paper products</li> <li>• Manufacture of chemical products</li> </ul>	In various countries such as USA, UK, France and the Netherlands	These suppliers are provided with Bunzl's Supplier Code of Conduct. In addition to the audits conducted by our team in Asia, our local operating companies carry out audits of suppliers in the regions in which they operate, based on local risk assessments.

### Corrective action by suppliers

The team in Shanghai and the Bunzl procurement professionals work with suppliers to achieve acceptable standards in all areas of the audit and, where breaches are identified, appropriate action is taken to address such breaches. Suppliers who are unable to meet all the requirements after an initial assessment/audit are given the opportunity to comply fully within a period of time which is deemed appropriate for the circumstances. We show zero tolerance for unacceptable practices at any site used for producing or sourcing Bunzl products. Such unacceptable practices include use of child, forced or bonded labour, illegal discrimination, wages not meeting local minimum requirements, not providing adequate days of rest and any other breach of local or applicable international requirements for workers' welfare and conditions of employment. Relationships with suppliers that fail to make improvements in those areas will be terminated.

In 2023, 66 suppliers underwent remediation efforts to correct identified unacceptable non-conformities. 10 suppliers did not make sufficient progress to address the concerns and we have subsequently ceased our relationship with those suppliers. Approximately 35% of the concerns were related to (suspected) cases of forced labour, child labour, or discrimination, and 43% were associated with not providing sufficient rest days. The remaining 22% were associated with not paying minimum wages to workers.

Bunzl is a member of the Responsible Labor Initiative (RLI). Established in 2017, the RLI is a multi-industry, multistakeholder initiative that focuses on ethical recruitment and employment practices. Based on leading Responsible Business Alliance standards and programs, RLI members, suppliers, recruitment partners and stakeholders use their collective influence and application of due diligence to drive the transformation of recruitment markets and reduce the risk of forced labour in global supply chains.

### Case study: Forced labour issue in Malaysia.

In 2023, during an audit of supplier of textile products in Thailand, the audit team found evidence of unacceptable work practices taking place. The migrant workers at the factory were forced to pay their own annual work permit at a cost that was approximately equivalent to one week's salary.

The team in Shanghai and the Bunzl operating companies that source products from the supplier, worked together to explain to the supplier why these practices are unacceptable and that resolving the issue was an essential condition for maintaining the relationship between Bunzl and the supplier. The supplier agreed to making the required changes and provided the required evidence to demonstrate the effective implementation. The paid fee was returned to the employees. The issue will be re-evaluated during the annual audits at this supplier.

We always show a willingness to work with suppliers to address areas of improvement. We use our leverage as a large international company to drive change at our suppliers and eliminate forced labour and other unethical practices from our supply chain. As a last resort, it may be necessary to exit the relationship and seek alternative sources of supply.

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# Progress made in 2023

**Our progress in 2023 is summarised below. Further details can be found in the respective sections in this statement.**

- Grievance process: None of the calls received through our speak up line related to modern slavery.
- Code of conduct: We have continued to ensure that the Group code of conduct is communicated to our employees and that the associated learning modules are completed by all employees.
- Audits and corrective action: During 2023, our team in Asia audited 1,022 suppliers (2022: 930) and 956 had no critical issues. We have worked with 66 suppliers on remediation efforts to bring them up to the required standard. If resolution is not possible within a reasonable time frame (usually six months) then we terminate the relationship.
- In 2023, we terminated relationships with 10 suppliers who failed to make enough progress.
- In 2023, 81% of our spend on products from high-risk regions was sourced from assessed and compliant suppliers. Our target is to increase this percentage to 90% by 2025.
- Supplier Training: We have organised one supplier training session in Thailand.

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## Looking ahead

**We remain fully committed to improving our programmes to eliminate modern slavery from our operations and supply chain. Our main objectives for 2024 are the following:**

- Further increase our supplier engagement process for suppliers outside of Asia as a step toward achieving our global target to ensure that 90% of our spend on products from all high-risk regions will be sourced from assessed and compliant suppliers by 2025.
- Renew the external risk assessment of our supplier base to establish social risks in our worldwide supply chain. This allows us to focus our attention and resources on the areas of greatest exposure to risk.
- Continue to take a proactive, risk-based approach to responsible sourcing, identifying common issues in our supply chain and working closely with suppliers to reduce the future incidences of these issues.
- Continue to expand capacity building and training of our suppliers in Asia by organising supplier conferences in Asia. We plan to organise three events in 2024 (two in China and one in Malaysia).