

Modern slavery and human trafficking statement

The UK Modern Slavery Act (“MSA”) requires companies operating in the UK to publish a slavery and human trafficking statement. This statement constitutes the Envirotainer Ltd. (“Envirotainer”) slavery and human trafficking statement for the financial year ending 31 December 2018 and applies to Envirotainer and its mother and sister companies.

Introduction

The Envirotainer group of companies provide solutions for patient safe air transport of healthcare products requiring temperature-controlled environment by offering different models of temperature-controlled air cargo containers for leasing by airlines/forwarders providing transportation/forwarding services to companies within the pharma/biopharma industry.

More information about Envirotainer can be found on www.envirotainer.com.

Principles

At the heart of Envirotainer’s approach to human rights is the internationally recognised UN Global Compact Declaration. Envirotainer’s commitment to act responsibly and with integrity across all areas of our business is embedded in our Code of Conduct. Envirotainer does not tolerate any form of modern slavery or human trafficking in any area of our business or supply chain.

The Envirotainer group has the below policies and processes in place to mitigate the risk of modern slavery and human trafficking across its business.

- Envirotainer Governance Framework
- Envirotainer Code of Conduct
- Envirotainer SpeakUp Guideline
- Envirotainer Employee Handbook

Organisational structure

Envirotainer Ltd is part of the Envirotainer Group with Envirotainer AB as the parent company which has its head office in Sweden. The Envirotainer group employs approximately 300 persons whereof five sales representatives are employed by Envirotainer Ltd. Envirotainer Ltd is engaged in local marketing, local sales support, local market research and local market analysis.

It is important to stress that Envirotainer encounters low modern slavery risk; its business does not employ or encounter low skilled, transient workers, all employees are employed in countries where slavery is an unusual occurrence and the majority on permanent contracts.

Code of conduct

Envirotainer’s reputation for acting responsibly is critical to running a successful and growing business that generates value for all our stakeholders. Our values are expressed through the guiding principles and standards of behaviour set out in our Code of Conduct.

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All employees are obliged to comply with the Code of Conduct, and we require anyone acting or working on our behalf, such as consultants, partners, sub-contractors and suppliers, to follow the standards set out the Code of Conduct. If anyone suspects that a breach of the Code of Conduct may be taking place, they are encouraged to raise it. For situations when the regular reporting channels are insufficient, employees can also report suspected misconduct via the SpeakUp line using a web-based application and telephone service.

All employees have received training relating to Envirotainer's Core Values and Code of Conduct. The training is also included in Envirotainer's onboarding program for joiners.

The Code of Conduct can be read in full on Envirotainer's website.

Supply chain

Envirotainer expects its business partners to have the same zero tolerance approach to any form of modern slavery. If any business partner would be found engaging in slavery or other unethical working practices, Envirotainer will take steps to address those issues with them, seek to drive improved standards and, if necessary, terminate the business relationship.

Envirotainer is in the process of extending the sourcing process to include a formalised due diligence framework. References to relevant regulations have been included in Envirotainer's template agreements and general terms and conditions and the process of incorporating contractual provisions for service providers and suppliers has commenced. Envirotainer regularly review all its service providers and the sourcing team work closely with them to help spot potential indicators of modern slavery.

Steps to manage risk

With international operations throughout the world, Envirotainer remains vigilant to the risk of slavery and human trafficking and check the implementation and respects of its policies. Envirotainer continuously works with the Core Values, Code of Conduct, Governance Framework and Employee Handbooks to ensure all managers and employees are aware and aligned on Envirotainer's guiding principles and regularly offer all managers leadership training in which these are embedded.

Envirotainer's commitment is reiterated to the employees in the Code of Conduct E-learning which also reminds of the responsibility to be alert for signs of forced labour. The E-learning was completed by all employees globally in 2018 and is included in the onboarding program for joiners.

Over the coming years, Envirotainer will continue to determine how to obtain further comfort over the effectiveness of existing anti-slavery and human trafficking measures.



Johan Syrén

Director

Envirotainer Ltd