

Modern Slavery Policy

Policy number:	PID-POL-MSP001
Version:	v2.0
Date issued:	April 2026
Review date:	April 2027
Document owner:	Peter Howells, Technical Director
Approved by:	Peter Howells, Technical Director

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Applies to:	Positive ID Labelling Ltd and its supply chain

1. Purpose and Scope

Modern slavery is a crime and a violation of fundamental human rights. It takes several forms, including slavery, servitude, forced and compulsory labour, and human trafficking. Positive ID Labelling Ltd has a zero-tolerance approach to modern slavery in any part of our business or supply chain.

This policy applies to all persons working for us or on our behalf in any capacity, including employees, contractors, and supply chain partners. It sets out the steps we take to ensure that modern slavery and human trafficking do not occur within our organisation or our supply chains.

This policy reflects our obligations under the Modern Slavery Act 2015 and our broader commitment to operating ethically and with integrity.

2. Our Business and Supply Chain

Positive ID Labelling Ltd is a label printing manufacturer based in Derbyshire, UK, established in 1987. We design, produce, and supply printed labels and identification solutions to businesses across the UK and internationally. We operate from a single UK site and employ more than 20 people directly.

Our supply chain includes suppliers of paper and plastic substrates, inks, adhesives, printing consumables, and related materials and services. The majority of our suppliers are UK-based or European, which we consider to carry a lower inherent risk of modern slavery than supply chains extending to higher-risk jurisdictions. We acknowledge, however, that risk is not eliminated by geography alone and we apply due diligence proportionate to that risk.

3. Risk Assessment

We have assessed our operations and supply chain against the indicators of modern slavery risk. Our assessment considers the nature of our supply chain, the countries and sectors involved, and the profile of our supplier base. We have identified the following as our primary risk areas:

- Raw material supply chains for paper and synthetic substrates, which may extend through multiple tiers to forestry, pulp, and chemical manufacturing.

- Temporary or agency labour arrangements, where oversight of working conditions may be less direct.
- Suppliers in sectors or jurisdictions with weaker labour protections than the UK.

We review this risk assessment annually and whenever our supply chain changes materially.

4. Due Diligence

We take the following steps to identify and address modern slavery risks across our supply chain.

Supplier onboarding

New suppliers are required to confirm their compliance with applicable employment law and, where relevant, to evidence their own modern slavery policies and procedures. We do not knowingly engage suppliers who cannot demonstrate commitment to these standards.

Ongoing monitoring

We maintain ongoing relationships with our key suppliers and monitor for signs of labour exploitation as part of our regular supplier communication. Where we identify concerns, we raise them directly with the supplier and escalate to senior management as appropriate.

Procurement standards

Our procurement decisions give weight to suppliers who achieve higher labour standards or demonstrate reduced modern slavery risk within their own supply chains. We prefer suppliers who can evidence compliance with recognised standards and who respond openly to our questions about their labour practices.

Contractual requirements

Our supplier terms of business require compliance with all applicable laws and regulations relating to employment, human rights, and anti-slavery. Serious breach of these requirements is grounds for termination of the supplier relationship.

5. Training and Awareness

We ensure that all relevant employees and managers are aware of the risks of modern slavery and the indicators that it may be occurring. This forms part of our induction for new employees and our ongoing communications with staff involved in procurement, supply chain management, and operational oversight.

We provide guidance to employees on how to recognise potential indicators of modern slavery and on their responsibility to report any concerns promptly.

6. Reporting Concerns

Any employee, supplier, or third party who has a concern about modern slavery or human trafficking in connection with our business or supply chain is encouraged to report it. Reports can be made to:

- The Technical Director directly: peter.howells@pid-labelling.co.uk
- By telephone: 01332 864895

- Anonymously, to any director, if the individual prefers not to be identified

We will not tolerate any form of retaliation against individuals who raise concerns in good faith. All reports will be taken seriously, treated confidentially as far as possible, and investigated promptly. Where the investigation reveals credible evidence of modern slavery, we will take appropriate action, which may include reporting to the relevant authorities.

The Modern Slavery Helpline can also be reached on 08000 121 700 (free and confidential) for those wishing to report concerns externally.

7. Performance Indicators

We monitor the effectiveness of this policy through the following indicators:

- Proportion of key suppliers who have confirmed compliance with our modern slavery requirements.
- Number of concerns raised and the outcomes of any investigations.
- Annual review of our supply chain risk assessment.
- Staff awareness of modern slavery indicators, assessed as part of induction and ongoing training.

8. Policy Review

This policy is owned by the Technical Director and will be reviewed annually, or immediately following any significant change in our business or supply chain that may affect the risk profile. Updates will be communicated to all relevant staff and suppliers.

Peter Howells

Technical Director, Positive ID Labelling Ltd

Date: April 2026