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## **Modern slavery act transparency statement**

## **MODERN SLAVERY ACT TRANSPARENCY STATEMENT**

Torraspapel, S.A. and its subsidiaries (the "**Lecta Group**") have a clear commitment to social responsibility, and have adopted economic, social and environmental management systems based on transparency and responsibility toward our customers, employees, suppliers, local communities and society in general.

We are committed to ensuring that modern slavery and human trafficking have no place in our business, and work continually with employees and suppliers to ensure that the principles in this statement are upheld.

### **Our organisational structure and business**

Lecta is a leading European manufacturer and distributor of specialty paper for labels and flexible packaging, coated and non-coated paper for publishing and commercial printing, and other high value-added print media

The group has its own merchants and sales offices in 10 countries and, with its extensive network of agents, our papers can also be found in over 130 countries on all five continents.

All of Lecta's manufacturing sites are certified to the strictest environmental standards – ISO 14001 and EMAS – and hold PEFC™ and FSC® chain of custody certificates. Furthermore, all Lecta sites have successfully completed audits for ISO 50001 energy efficiency, ISO 9001 quality and OHSAS 18001 occupational health and safety certification.

Lecta SA is the ultimate owner of the Lecta Group. Operations in Europe are carried out through Torraspapel, S.A. and its subsidiaries (including UK based Lecta Paper UK Ltd).

### **Our staff**

One of the core values in the Lecta Group is the right of all employees to demand respect for their individual personality and personal dignity. In this regard, all directors and employees must refrain from acting in a manner that may be construed as harmful to the dignity, physical or emotional integrity, freedom and individual personality of those with whom they interact in the performance of their professional duties.

The Lecta Group works with its staff to promote, communicate and consolidate a culture of occupational safety- the health and safety of its employees is an absolute priority. We work hard to identify and raise awareness about existing occupational hazards, ensuring compliance with all occupational health and safety regulations at

every level. Details of the Lecta Group's health and safety certification can be found at <http://www.lecta.com/en/certificates>.

We also strive to create an environment where individuals are not discriminated against and adopt a zero tolerance policy towards violence and harassment in the workplace. The Lecta Group will not, under any circumstances, permit behaviour or actions that could create an intimidating, hostile or offensive working environment.

### **Our supply chains**

Lecta is able to guarantee the sustainable origin of the wood used to manufacture its products in strict compliance with new EU Timber Regulation and PEFC and FSC Chain of custody standards, thereby offering maximum credibility and transparency in its wood sourcing operations.

When selecting suppliers, it is the Lecta Group's policy to consider the reputation and integrity of these companies, amongst other factors.

### **Due Diligence**

We expect all of our suppliers, agents and other business partners to uphold the same standards as the Lecta Group. We continually monitor any potential areas of risk in relation to our business and supply chains, and work to ensure that our suppliers respect all applicable legislation, and never use forced labour or coercion.

### **Assessing and managing risk**

#### *Code of Ethics*

We have adopted a Code of Ethics (the "**Code**") which applies to companies within the Lecta Group. The Code was written in order to clearly express our desire to commit to a set of values and rules of conduct. It relates to working conditions, the health and safety of employees, environmental obligations and business dealings more generally and must be followed by the Group's employees, directors and executives as well as all external associates (including suppliers, sales agents and subcontractors who work with the Lecta Group).

The Lecta Group have set up a Complaints Office, which allows employees to report any problems confidentially that relate to a violation or suspected violation of the Code. Any reported violations are then handled by the Monitoring and Supervision Committee who:

- i) monitor changes in legislation to ensure that the Code is consistent with all applicable regulations;
- ii) promote procedures to ensure that the Code is distributed, circulated and observed;

- iii) promote communication initiatives and specific training programmes for employees of the Lecta Group; and
- iv) submit weekly reports on observance and, if necessary, updated versions of the Code to the Steering Committee and Board of Directors.

*United Nations Global Compact*

To show our commitment to best business practices, we joined the United Nations Global Compact, the world's largest Corporate Social Responsibility initiative, in 2004. Through this membership we accept the ethical responsibility to make the Compact's ten principles (governing conduct and actions in the areas of human rights, labour standards, environment and anti-bribery) an integral part of our corporate strategy, culture and daily operations. We submit an annual report describing how we have advanced or improved in each of these areas, increasing the transparency of our actions. The report is available at [www.unglobalcompact.org](http://www.unglobalcompact.org).

**Training**

It is important to the Lecta Group that our employees are aware of the issues surrounding modern slavery. Our legal and compliance team is up to date on the requirements of the Modern Slavery Act, and our Monitoring and Supervision Committee intends to promote further communication initiatives and training programmes so that our employees are reminded of the channels through which any concerns can be reported.

**Looking ahead**

We understand that modern slavery risks continually change and we will continue to monitor and develop our practices in respect of combatting slavery and human trafficking over the coming year.

This statement is given on behalf of Torraspapel SA and its subsidiaries for the financial year ending 31 December 2016. It sets out the steps taken during the financial year to prevent modern slavery and human trafficking in our business and supply chains.

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Eduardo Querol Solà  
Managing Director  
Signed on behalf of Torraspapel SA  
01/06/2017