



## Modern Slavery Act Transparency Statement 2018

### Introduction

This statement is made by Stölzle Glass Group for the financial year ending 31 December 2018, pursuant to obligations under section 54(1) of the Modern Slavery Act 2015, and constitutes the Modern Slavery Act transparency statement.

The Stölzle Glass Group is a global leader in glass packaging solutions. For more than 200 years, the Stölzle glass group has been manufacturing high-quality packaging glass for pharmaceutical products, perfumery and cosmetics, spirits as well as small glass for food and beverages. In addition to numerous standard glasses, Stölzle offers innovative and design-oriented packaging solutions for customer projects. With six production sites in Austria, Great Britain, France, the Czech Republic and Poland and three decoration sites in Great Britain, France and Poland with 2 800 employees worldwide the Glass Group is producing 3.1 billion glasses annually.

Respect for human rights is an integral part of Stölzle core values and business principles, as outlined in [Stölzle Glass Group's Code of Conduct](#) and [Corporate Social Responsibility Policy](#), which are available for viewing on our corporate website. We foster an organizational culture that respects dignity and human rights and we believe that conducting business with high ethical trading standards is fundamental to this culture. Stölzle Glass Group commitment to promoting human rights applies to all Stölzle sites and business units worldwide. As a global company, Stölzle considers this to be its social and ethical duty and an important prerequisite for the sustainable development of the whole Stölzle Glass Group.

In line with the UK's Modern Slavery Act, we are required to formally report on the steps we have taken to combat modern slavery both in our own organization and our supply chains on an annual basis.

### Our Business and Supply Chains

As a glass packaging manufacturer, Stölzle purchases a significant volume of materials and services. Key suppliers are critical to the business, and as such are carefully managed. Key inputs to our manufacturing process include: energy, raw materials, moulds, consumables, components packaging and logistics. These commodities have a limited number of chosen suppliers who can serve Stölzle's business. Stölzle mainly sources its goods within the EU.

### Our Policies

We foster an organizational culture that respects dignity and human rights and we believe that conducting business with high ethical trading standards is fundamental to this culture. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.



Respect for human rights is an integral part of Stölzle core values and business principles, as outlined in [Stölzle Glass Group's Code of Conduct](#) and [Corporate Social Responsibility Policy](#) , which are available for viewing on our corporate website.

Both documents outlines our core values and business principles, including our employment practices and encourages all staff to report any concerns relating to non-compliance with laws on an international, regional national and/or local level. Any concerns (including in relation to issues of modern slavery) on an anonymous basis, without fear of retaliation, can be reported anonymously to [compliance@stoelzle.com](mailto:compliance@stoelzle.com).

Stölzle Glass Group's Supplier Code of Conduct sets out the standards we expect of our suppliers during our business relationships. In particular, the Supplier Code of Conduct outlines requirements for our suppliers regarding key social, ethical and environmental topics, inclusive of modern day slavery.

## [Our Approach](#)

Most of our supply chains are, by design, relatively short and stable. Our business strategy is to conduct business directly with origin or source suppliers and manufacturers to achieve maximum commercial benefit and to ensure corporate and sustainable responsibility.

As part of the existing certified quality management system, supplier management is of considerable importance in the purchasing process of raw materials, packaging materials and external services. Our supplier management strategy encompasses the following: a qualification process for new suppliers; monitoring said suppliers in the annual supplier audits in accordance with an audit plan; and an annual performance evaluation. Purchasing, quality and CSR management work closely together in this process. Transparency in dealings with our suppliers is just as important to us as mutual appreciation and the maintenance of long-term connections.

The incorporation of sustainability aspects is based on the following pillars:

### 1. Supplier evaluation with the aid of surveys and set criteria

During sustainable supplier management, we take into consideration besides economic also social and ecological factors. We continually monitor media sources to ensure we do not overlook any potential risks within our supply chain.

### 2. Onsite Assessments Audits

Auditing sustainability aspects is part of the performance audit. As a component of the audit checklists, the auditors will ask questions about standards in environmental protection and social responsibility. Based on yearly risk assessment, we choose a selection of suppliers to conduct an onsite audit. While risk assessment we take into consideration multiple factors such as the industry, geography and the risk of human rights abuses (such as modern slavery) when deciding which suppliers to focus on for the year ahead.

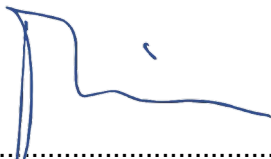
### 3. Contracts

Our supply contracts include appropriate terms to ensure that our suppliers trade ethically and take appropriate steps to ensure there is no slavery or trafficking in their business. This is ensured by including Supplier Code of Conduct in contracts.

#### Responsibility and Effectiveness

We remain committed to upholding human rights and safety in our supply chain and we will be reviewing our progress and effectiveness in combatting slavery and human trafficking on an annual basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Modern Slavery Act transparency statement for Stölzle Glass Group particular for Stölzle Flaconnage Ltd. for the financial year ending 31 December 2018.



.....  
DI Georg Feith  
CEO, Stölzle Glass Group



.....  
Thomas Riss  
CEO, Stölzle Flaconnage Ltd.