

IFCO FY 2025 - Modern Slavery and Human Trafficking Statement

1. Introduction

IFCO Systems UK Ltd, a private limited company registered in England under company number 02997052 (“**IFCO UK**”), is part of the international IFCO group of companies (collectively “**IFCO**”). IFCO Systems UK Ltd, makes the following statement on modern slavery and human trafficking pursuant to section 54 of the Modern Slavery Act 2015.

This statement outlines the steps IFCO has taken for the financial year ended 30 June 2025 to identify, manage and mitigate the risk of modern slavery in its operations and supply chain, and ensure that modern slavery is not taking place.

2. Our Business and Supply Chain

IFCO is the leading provider of reusable packaging containers (‘RPCs’) for fresh products including fruits and vegetables, meat and bread. By partnering with leading producers and retailers, we are working to create the most cost effective and sustainable supply chain. IFCO owns a pool of RPCs which it hires to customers globally in a circular supply chain. Currently, the IFCO group operates in 47 countries around the world. IFCO provides supply chain logistics services to these customers in the form of longstanding expertise in the pooling and management of RPCs.

IFCO UK is the UK company of the IFCO group, employing 50 employees. IFCO UK’s 100% owned subsidiary in the UK, Ralph Coleman International Ltd, operates IFCO UK’s wash centres for its RPCs. Ralph Coleman International Ltd employs 402 employees and around 290 temporary staff at its locations.

IFCO UK sources its RPCs directly from its German parent company, IFCO Systems GmbH located in Munich, Germany. IFCO UK’s main business sector is in food retail and logistics, with customers including large supermarket chains.

To date, IFCO has not identified any violations of the Modern Slavery Act in its business or supply chains.

3. Definition of Modern Slavery

Modern Slavery is a global problem, affecting millions of people around the world. Modern Slavery can take many forms, including:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;

- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

4. Commitment

IFCO operates with honesty and integrity wherever it does business around the world. We respect human rights and treat the people in our supply chain who make and supply our products and services fairly. IFCO takes a zero-tolerance approach to violations of the Modern Slavery Act 2015 in any part of its business or in any of its supply chains and is committed to ensuring that there is no slavery or human trafficking present in either.

We are committed to maintain and improve our processes to prevent slavery and human trafficking violations related to our own operations and our supply chains. IFCO does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to IFCO in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. IFCO adheres to the standards required in relation to its responsibilities under relevant employment legislation.

5. Potential Exposure

The risk and prevalence of modern slavery offences is linked to a workforce demographic that is conducive to exploitative practices. Typically, this is work that is informal, temporary, seasonal, low skilled and relatively low paid, and is more commonly found through extended supply tiers. This risk is compounded in countries and product supply chains where there are additional aggravating factors such as high levels of corruption, poverty, lack of social and economic opportunities, absence of worker representation or complicated supply chains.

In general, IFCO UK considers its exposure to slavery/human trafficking to be limited. Geographically, IFCO UK is not active in high-risk countries, and its strategic suppliers are reliable organisations with high ethical standards and controls.

We have assessed our greatest risk of slavery as being in our external supply for wash centre service operations. Our sample testing this year has focused on such suppliers and included reviewing suppliers' policies and procedures, as well as carrying out our own research.

IFCO UK has joined the Slave Free Alliance in order to increase its awareness of modern slavery and human trafficking, and to source tools and training to prevent it within IFCO UK's supply chain.

6. Measures Taken

IFCO UK has developed policies and due diligence processes relevant to modern slavery in order to mitigate its risks within IFCO UK's supply chain and operations.

6.1 Organisational policies

IFCO has internal policies in place which address issues of wage and labour laws, including employee conduct and whistleblowing.

- **Code of Conduct**

IFCO's Code of Conduct is a central part of our business. The Code of Conduct outlines how IFCO conducts business and provides IFCO's fundamental shared values and an ethical and legal framework for all IFCO employees in the conduct of IFCO business. It is a key part of the IFCO culture and is made available to everyone who works at IFCO. It also sets out processes and procedures for our employees to follow, including whistleblowing; confidential reporting; and our commitment to follow all applicable wage, anti-discrimination and labour laws. All laws relating to the terms and conditions of employment, especially child labour, in any place where we do business, must be obeyed, including by our suppliers, agents or contractors. Every employee is required to read and confirm they understand IFCO's Code of Conduct. Our Code of Conduct can be found at:

<https://www.ifco.com/media/IFCO-Global-Code-of-Conduct-English.pdf>.

Our IFCO Code of Conduct, and our terms and conditions with domestic and international suppliers, require compliance with all applicable government laws, rules and regulations (including laws prohibiting human trafficking and forced labour). IFCO's Code of Conduct is kept under continual review to ensure it remains up to date with applicable laws.

- **Supplier Policy**

IFCO has a comprehensive Supplier Policy to make its expectations and requirements on Suppliers more robust and detailed in the areas of employee treatment and prohibition of forced and child labour. IFCO's key supplier contracts, for example with agencies that supply temporary workers, include obligations to comply with the Supplier Policy. We expect that our suppliers:

- ✓ Conduct their business with the highest ethical standards in accordance with all applicable laws, rules and regulations of the countries in which they operate, including laws prohibiting human trafficking and forced labour;
- ✓ Show respect to people and their human rights;
- ✓ Create and maintain a culture of diversity and inclusion;
- ✓ Prohibit forced or child labour, as well as any inhumane treatment;
- ✓ Abide by minimum working age requirements outlined in IFCO's Supplier Policy.

IFCO's Supplier Policy can be found here: <https://www.ifco.com/wp-content/uploads/Supplier-Policy.pdf>

IFCO will terminate its relationship with existing suppliers if they or their contractors and suppliers tolerate slavery or human trafficking in any part of their business or supply chains.

- **Human Rights Policy**

People are the core of our business. Our responsibility is to protect human rights. IFCO has incorporated a Zero Harm Policy which is available on our website (<https://www.ifco.com/about-ifco/zero-harm/>). We do not tolerate forced labour, human trafficking, child labour and any other kind of slavery.

These policies have been integrated in contracts with our suppliers and business partners. Failure to adhere to these policies may result in consequences up to and including termination of the business relationship.

- **Reporting procedure**

Any concerns or suspicions of modern slavery in the workplace can be reported via the line managers, the HR Department, IFCO's Integrity Line or the Slave Free Alliance's helpline.

6.2 Due Diligence

- **Engagement**

Management level employees on site are responsible for identifying risks and potential cases of slavery or human trafficking and implementing required actions. IFCO UK's HR team are responsible for assessing and responding to cases raised by local management. Posters are displayed across all IFCO UK and RCI sites with regards to modern slavery, including signs to look out for and information on what to do when suspecting slavery.

- **Supplier Contracts**

We aim to look for suppliers that are ethical and support IFCO values and our corporate social responsibility objectives. Where possible we re-use trusted suppliers for contracted wash centre operations who are familiar to us and have already undergone due diligence. We do spot check how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains by reviewing suppliers' policies and procedures, as well as carrying out our own research.

IFCO has required suppliers, particularly those who provide temporary workers for IFCO's sites, to enter into contractually binding obligations that are designed to prevent slavery, including agreeing to audits and taking remedial actions where necessary. IFCO reserves its rights to terminate supplier agreements for violations of its anti-slavery rules.

- **Integrity Line**

Employees and suppliers are expected to be proactive about ethical issues so that they promptly raise any concern or violation of our Code of Conduct with us. We have established an anonymous confidential program to report any human right violation including human trafficking or any other form of slavery. Employees in around 25 countries have the opportunity to report any violation 24 hours a day, seven days a week. Retaliation against employees who file a report is not tolerated.

6.3 Other steps undertaken to manage risk

The Directors and management team have been made aware of the importance of Modern Slavery and Human Trafficking compliance.

IFCO has robust recruitment processes in line with UK employment laws, including: 'right to work' document checks; contracts of employment and checks to ensure everyone employed is at least 16 years old. Staff compliance audits are also undertaken, which include checking residence details and bank account names and addresses.

IFCO has a Supplier Due Diligence questionnaire that IFCO requires partners and suppliers to complete according to IFCO's risk profiling, with questions specific to Modern Slavery compliance and steps taken to prevent modern slavery. We have included an anti-slavery certification within the Due Diligence questionnaire, to ensure our suppliers are aware of this requirement and expectation to comply with all anti-slavery and human trafficking laws.

6.4 Training and Awareness

We understand training is critical to raising awareness and knowledge of modern slavery. IFCO UK is working on producing training materials for its employees that it plans to release during the next financial year.

7. Monitoring and Evaluating Effectiveness

IFCO has taken the following steps to monitor and evaluate its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against appropriate performance indicators:

- **Slave Free Alliance**

As a measure of our commitment to combating modern slavery, IFCO is a member of the Slave Free Alliance, a non-profit organisation which supports organisations in working towards slave-free operations and supply chains.

IFCO joined the Slave Free Alliance following a visit by the Slave Free Alliance to one of IFCO's wash sites as part of a wider audit taking place at a customer location. IFCO implemented actions suggested by the Slave Free Alliance in order to reduce the risk of modern slavery, including improving checks on temporary labour suppliers. A follow up visit by the Slave Free Alliance confirmed their approval of IFCO's actions and improvement to IFCO's due diligence processes.

We display the Slave Free Alliance's information posters across all our UK wash sites in different languages. The helpline number is included on the posters.

The Slave Free Alliance has also carried out a due diligence analysis and audit of providers of temporary labour to IFCO's UK operations and will provide a full report with suggested improvements if required.

During IFCO's next financial year IFCO plans to work further with the Slave Free Alliance, including potential training for all levels of IFCO's business. We will also review achievable goals and key performance indicators to measure progress at identifying and preventing slavery.

8. Future Plans

We recognise that there are always improvements that can be made. We will continue to:

- provide awareness and training on human trafficking and slavery to our employees and suppliers.
- review our policies, due diligence and processes in relation to the prevention of slavery and human trafficking.
- review our contractual clauses related to modern slavery and human trafficking and update them on a regular basis in accordance with new applicable laws in all countries where IFCO operates. IFCO will continue to strengthen its supplier contract compliance terms, including contractual obligations on suppliers to comply with IFCO's Supplier Policy and anti-slavery rules, with termination rights attached to this.

- ensure that new employees receive training on how to prevent modern slavery and human trafficking, with a focus on employees responsible for procurement of goods and services.
- use information and analysis from the Slave Free Alliance to safeguard IFCO's business and supply chain against modern slavery.

9. Approval

This Statement on Modern Slavery and Human Trafficking for the financial year ended 30 June 2025 has been approved by the directors of IFCO Systems UK Ltd.

Michael Pooley,
Director and
Chief Executive Officer

Dr. Julian zu Putnitz,
Director and
Chief Financial
Officer

Christopher Taylor
Managing Director

Christoph Trixl
Director