ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

30 September 2026

We, Navigator Tissue UK Limited, make this statement pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act).

INTRODUCTION

We acknowledge and respect our obligations under the Act and we're committed to improving our practices to eradicate slavery and human trafficking.

This statement outlines the steps we take in implementing and enforcing polices and procedures that identify, prevent, and mitigate all potential modern slavery and human trafficking risks within our business and across our supply chain.

ORGANISATIONAL STRUCTURE

Navigator Tissue UK Limited is a Lancashire-based leading tissue converter supplying toilet rolls, kitchen rolls, facial tissues, and wet wipes to leading retailers. In May 2024, we were acquired by The Navigator Group, a leading integrated European forest-to-paper producer and a key player in the Western European tissue market.

This statement is applicable to Navigator Tissue UK and the following entities: Navigator Tissue UK Limited (03639930). Navigator Holdings Tissue UK Limited (09019496).

John Dale Limited (02479498), and Severn Delta Limited (04269451) until 31st October 2026

SUPPLY CHAINS

Our supply chains include paper mills, packaging manufacturers and service providers located within the UK and internationally. As part of our procurement procedures, we require our supply base to provide information about their ethical trading systems and practices in their businesses.

OUR COLLEAGUES

Necessary use of temporary labour can pose a high risk of human trafficking. Accordingly, we have robust audit procedures in place to ensure fair and compliant practices are adopted and to prevent labour exploitation and modern slavery. Our audit procedure is reviewed regularly in accordance with the Ethical Trading Initiative Base Code and under guidance from the Gangmasters and Labour Abuse Authority.

Our strategic objective is to remove the necessity of temporary labour within our operations, and we will continue to reduce the use within our tissue converting sites and our wet wipe facilities.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

We operate in accordance with the Ethical Trading Initiative Base Code, hold membership with SEDEX, the Supplier Ethical Data Exchange, and are independently audited to ensure our systems and standards are legally compliant, fit for our business and are sufficiently maintained.

DUE DILIGENCE FOR SLAVERY AND HUMAN TRAFFICKING

We provide all our colleagues with employment rights information as part of their induction and provide ongoing relevant information in our Ethical Trading Policy Manual. We encourage our workforce to report any related concerns in confidence and provide our colleagues with access to an independent whistle-blowing call line. We are committed to dealing with any suspected breaches of the Act seriously and with urgency.

We are committed to reviewing this statement annually and shall continuously work to improve our systems and policies.

This statement will be reviewed before 30th September 2027.

Vasco Ferreira
Tissue Finance & Business Performance Director