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Modern Slavery and Human Trafficking Statement

Elliott Baxter & Company Limited (EBB)

April 2026

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Elliott Baxter & Company Limited during the financial year to prevent modern slavery and human trafficking in our business and supply chains.

1. Our Business and Supply Chains

EBB is a family-owned business with over 100 years of heritage and is a leading independent supplier of paper, paperboard and office products across the UK and Ireland.

Our operations include the sourcing, storage, sales and distribution of paper, board and office products, supported by our own fleet and national logistics network.

Our supply chain includes:

- Paper and board mills
- Merchants and distributors
- Logistics and transport providers

We source predominantly from Europe, with some supply from outside the UK and EU. We recognise that global supply chains can present varying levels of modern slavery risk.

2. Our Commitment and Policies

EBB is committed to acting ethically, with integrity and transparency in all business dealings. We have a zero-tolerance approach to modern slavery and human trafficking.

Our approach is supported by internal policies, procedures and recognised standards, including:

- Code of Conduct
- Supplier onboarding and due diligence processes
- Whistleblowing / compliance reporting process
- Integrated Management System aligned to:
 - › ISO 9001 (Quality Management)
 - › ISO 14001 (Environmental Management)
 - › ISO 50001 (Energy Management)
- Chain of custody and responsible sourcing certifications:
 - › FSC (Forest Stewardship Council)
 - › PEFC (Programme for the Endorsement of Forest Certification)
- Compliance with timber and environmental regulations:
 - › UKTR (UK Timber Regulation)
 - › EUTR (EU Timber Regulation)

These frameworks support our commitment to responsible sourcing, ethical supply chains and environmental stewardship.



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We expect all suppliers and partners to uphold the same high standards and comply with applicable laws relating to labour rights, human rights and ethical sourcing.

3. Risk Assessment and Risk Management

EBB takes a risk-based approach to identifying and managing modern slavery risks.

We assess risk based on:

- Country of origin
- Product type and supply chain complexity
- Labour intensity and workforce characteristics

Suppliers operating outside the UK and EU, or in higher-risk regions, are subject to enhanced scrutiny.

We continue to develop our risk mapping processes, with a particular focus on higher-risk geographies and supply chains.

4. Due Diligence Processes

We undertake proportionate due diligence to mitigate risk across our supply chain, including:

- Supplier onboarding checks and modern slavery declarations
- Requests for confirmation of compliance with modern slavery legislation
- Review of supplier policies, certifications and responsible sourcing credentials
- Ongoing monitoring of higher-risk suppliers

Our certifications and regulatory compliance frameworks, including FSC, PEFC, UKTR and EUTR, support traceability and responsible sourcing within our supply chain.

Where concerns are identified, we will:

- Investigate and assess the level of risk
- Engage with suppliers to address issues
- Escalate where necessary, including potential disengagement

We encourage all employees and partners to raise concerns through our confidential reporting channels, which are handled appropriately and without retaliation.

5. Training and Awareness

EBB is committed to raising awareness of modern slavery risks across the business.

We provide training to relevant employees, particularly those involved in:

- Procurement and supplier management
- Sales and customer-facing roles
- Logistics and operations
- People management

Training covers:

- Understanding modern slavery risks



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- Identifying warning signs
- Reporting and escalation processes
- Responsibilities under our policies

We will continue to develop and expand training to ensure it remains effective and relevant.

6. Measuring Effectiveness

We monitor the effectiveness of our approach through a number of internal indicators, including:

- Percentage of suppliers who have signed a modern slavery declaration
- Percentage of higher-risk suppliers subject to enhanced due diligence
- Number of supplier reviews completed
- Percentage of relevant employees completing training
- Number of concerns raised and time taken to respond
- Ongoing review and update of policies and processes

These measures help us assess performance and identify areas for continuous improvement.

We will continue to develop these measures to assess not only activity, but the effectiveness of our actions in reducing risk across our supply chain.

Governance and Approval

Responsibility for implementing this statement sits with the Directors and Senior Management team.

EBB is committed to continuous improvement and will review this statement annually, alongside our wider controls and processes.

In the next financial year, we will continue to strengthen our supplier engagement, risk assessment and training programmes to further improve transparency and oversight.

This statement has been approved by the Board of Directors of Elliott Baxter & Company Limited.

This statement will be published on the Company's website in accordance with the Modern Slavery Act 2015.

Approved by:

Matt Elliott

Managing Director

Date: 20 April 2026