

API Group plc and Subsidiaries (“API”) Slavery and Human Trafficking Statement

INTRODUCTION FROM THE PRESIDENT & CEO OF API

We are committed to improving our practices to combat slavery and human trafficking.

In 2017 we have implemented an Anti-Slavery and Human Trafficking Policy across API and we will be developing our supplier audit process throughout the rest of 2017 to continue our efforts to improve our practices to combat slavery and human trafficking.

ORGANISATION'S STRUCTURE

We are a manufacturer of packaging materials and a provider of brand enhancement services in the packaging sector. API's ultimate parent company is Steel Partners Holdings L.P. whose head office is in the United States of America. API has over 600 employees worldwide and operates in the United Kingdom, the United States, France, Germany, Italy, Poland, Hong Kong, the Netherlands and the Czech Republic.

API has a global annual turnover of £125.5 million.

OUR BUSINESS

Our business is organised into departmental functions including Sales & Marketing, Purchasing, Operations, Product Development & Technology, Finance, Legal & Human Resources and IT.

OUR SUPPLY CHAINS

Our supply chains include suppliers of:

- raw materials such as board, film, solvents and resins;
- freight for in-bound delivery;
- machinery for manufacturing and production processes, and consumables and parts for the operation of that machinery;
- conversion, finishing and packaging materials; and
- out-bound freight to our customers.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

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. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place an Anti-Slavery and Human Trafficking Policy.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains as noted above we intend to develop our supplier audit process throughout the rest of 2017 to continue our efforts to improve our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes API's slavery and human trafficking statement for the financial year ending 31 December 2016.

.....*Jack Howard*.....

Jack Howard
Director for and on behalf of API Group plc

Date: *12 June 2017*