

API Group plc and UK Subsidiaries Slavery and Human Trafficking Statement

INTRODUCTION FROM THE PRESIDENT & CEO OF API

This Modern Slavery Act Statement is made on behalf of API Group plc (00169249), API Group Services Limited (05017829), API Laminates Limited (00173955) and API Foils Limited (00202034) (together "API").

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

In 2017 we implemented an Anti-Slavery and Human Trafficking Policy across API and we are continuing to develop our supplier audit process and thereby improve our practices to combat slavery and human trafficking. A copy of our Anti-Slavery and Human Trafficking Policy is issued to all new employees on joining the business and is available on our website at the link "Modern Slavery Act Policy and Statements".

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 New York, the United States of America. API has approximately 500 employees worldwide and operates in the United Kingdom, the United States, the Netherlands, France, Italy, Poland and Hong Kong.

API has a global annual turnover of £124.6m million.

OUR BUSINESS

Our business is organised into business units and departmental functions including 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.

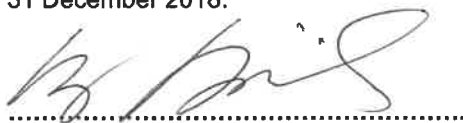
TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, our HR Managers and Procurement Managers provide training to our employees on the subject.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken in 2018 to ensure that there is no slavery or human trafficking in our supply chains as noted above we intend to continue to develop our supplier audit process to further 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 2018.



Kostantinos Kiriakopoulos
Director for and on behalf of API Group plc

Date: th 11 July 2019