

Lawful and ethical behaviour is of paramount importance to Opalion and is critical to our continued success. Opalion's Code of Business Conduct and Ethics makes it clear that is a requirement for all our employees and places similar obligations upon our suppliers. As part of this requirement Opalion is committed to protecting and advancing human rights in all our operations wherever they may be in the world.

Opalion is fully supportive of the laws introduced within the United Kingdom through the Modern Slavery Act 2015 (to combat slavery, forced or compulsory labour and the trafficking of persons for any purpose ('Slavery and Human Trafficking')). The below statement follows the recommendations with Section 54 (1) and outlines the steps that Opalion takes to combat all forms of Slavery and Human Trafficking.

About Opalion

Opalion Limited's primary activities include the supply of a wide range of medical and industrial disposable polythene products, general packaging items and PPE. Through our global supply chain, we work closely with our suppliers to innovate, design, source and sell our products. Modern slavery is an umbrella term that includes forced labour, debt bondage, servitude, and trafficking for the purposes of labour exploitation. Our principles and commitment to assessing not only modern slavery and human trafficking but also the full extent of social accountability is built and managed through our risk management and business policies.

Our Supply Chain

Opalion has a well-defined and proven supply chain which covers our UK, European and Far Eastern suppliers and whom are evaluated annually. This enables us to control and manage the shipment and delivery of products to our warehouses located across the UK.

In addition, Opalion also operates a Third-Party Logistics (3PL) division, which provides warehousing and distribution services. We apply the same rigorous ethical standards and compliance checks to our 3PL operations, ensuring that all partners adhere to our Code of Business Conduct and the Modern Slavery Act 2015.

Relevant Policies

Opalion Ethical Trading Code of Conduct sets out the expectations that are relevant for all our employees and for our suppliers wherever we do business in the world. Doing business in an ethical and responsible manner is already enshrined within our current set of policies and procedures. These policy and procedures help to ensure that Slavery and Human Trafficking does not occur within Opalion or its supply chains.

Risk Assessment

Opalion continually strives to enhance its approach and its internal policies and procedures have been reviewed considering the changes in laws in Slavery and Human Trafficking.

We seek to source our products in a responsible manner and fully expects and requires our Suppliers to operate in full compliance with all applicable laws. A failure by any Supplier to comply with applicable laws (including as they relate to Slavery and Human Trafficking) would be a justifiable reason for such relationship to be terminated.

Given the nature of our business model, Opalion does not currently believe that there is a significant risk of Slavery and Human Trafficking within our supply chain. We, however, continue to review our Supplier engagement policies, contractual approach, and due diligence process to improve our program and mitigate risks of slavery and human trafficking in this area, which is an area of greater relative risk.

Opalion will continue to build upon the robust compliance culture that it has in place and seek to maintain its high standards and identify ways to further enhance this.

Additional Workforce Commitments

Opalion is committed to ensuring fair treatment and ethical practices for all workers within our operations and supply chain. In support of this commitment, Opalion:

- Does not charge workers for items essential to their role, including Personal Protective Equipment (PPE). All necessary equipment is provided free of charge to ensure safety and compliance
- Has never committed any act contravening the Blacklist Regulations 2010. We maintain strict policies to prevent any form of unlawful discrimination of blacklisting practices.
- Does not use zero-hours contracts and is a proud Living Wage Employer, ensuring all employees receive fair pay and secure working conditions



Signed on behalf of Opalion Ltd
Vijay Shah, Managing Director

Reviewed - December 2025