

Tosca Ltd.

Modern Slavery Statement FY 2022



1. Introduction

This statement sets out Tosca's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

We recognize that we have a responsibility under the UK Modern Slavery Act 2015, the California Transparency and Supply Chains Act of 2010 and the Australian Modern Slavery Act 2018 to take a robust approach to slavery and human trafficking and we are fully committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

2. Our Business and Supply Chain

Tosca Services, LLC ("Tosca") is a values-driven organization headquartered in the USA which operates across North America, the UK, as well as 10 other countries worldwide. Tosca has over 60 facilities (including offices, service centers and a manufacturing facility) worldwide.

Tosca is the only reusable packaging and pooling company which connects the entire supply chain end-to-end, from the manufacture of reusable plastic packaging in the form of reusable plastic crates (RPCs), pallets, bulk containers, dollies, layers and trays and displays, to leasing, washing and returning products for reuse in our pooling operations, and sales of finished goods.

The majority of products made in our own manufacturing facility in Israel go into our pooling operations with only a small proportion sold for use and while our primary focus is the movement of goods through the food supply chain we also support the flow of non-food goods as well.

Our supply chain covers the:

- Procurement of raw materials for the manufacturing of our products,
- Contracting of third parties who perform manufacturing and washing activities on our behalf,
- Contracting of logistics companies which move our products to and from customers and to our own wash centers, and
- Recycling of broken products through third party companies as well as in our own manufacturing facility.

3. *Our Mission and Values*

Our Mission: is to revolutionize the flow of goods through the food supply chain, eliminating waste at every turn.

We see a future where all one-way packaging is converted to reusable.

Our Values are:

Passion: We are hungry to make things better, smarter, easier. We love what we do and the value it creates.

Customer focused: We are most successful when our customers win. We listen and learn, then actively pursue the right solution for long term success.

Expertise: We know supply chains top to bottom, end to end, across a range of segments.

Collaboration: We work together, communicating with complete transparency. Side by side across functions and geographies is how we do our best work.

Appreciation: We're a compassionate company who values our team members and customers. Respecting them means caring about their satisfaction and success.

Reliability: Our products always come through – efficiently and thoroughly.

4. *Our Commitment*

Tosca is committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

We are participants in the United Nations Global Compact which shows our commitment to supporting the protection of internationally proclaimed human rights, the elimination of all forms of forced and compulsory labor and the effective abolition of child labor.

5. *Our Policies*

Compliance with the requirements of all applicable employment, labor and human rights laws to ensure fair and ethical employment practices is enshrined in our policies.

In 2022 we launched our global [Tosca Code of Conduct](#) (COC) (the “Policies”) which along with our global [Human Rights Policy Statement](#) align our activities with the requirements of the Universal Declaration of Human Rights expressed by the United Nations.

These Policies define Tosca’s standards and principles with respect to human rights. They also provide guidance to employees regarding their human rights responsibilities and explain how Tosca will enforce these requirements. Specifically, through our COC we require that all employees, directors, officers and third parties that conduct business with Tosca or on its behalf, act with fairness, integrity and high standards of personal and business ethics.

Everyone is accountable for upholding the COC and for reporting potential violations of the COC or the law to their managers or through the Tosca Ethics Helpline or another appropriate method. The Tosca Ethics Helpline is operated by a third-party agency and is available 24/7 in all countries and languages in which we operate.

Our Human Rights Policy Statement also clearly establishes that Tosca will not tolerate any of the following:

- Discrimination, harassment or retaliation
- Forced, compulsory or other prohibited labor
- Child labor
- Non-adherence to local laws regarding work hours, wages and benefits
- A lack of safe and healthy work environments
- Prevention of freedom of association and collective bargaining
- Non-respect for privacy
- Suppliers who do not address human rights with the same level of importance as ourselves

6. Our Supply Chain Expectations

Any persons or entities conducting business with Tosca are expected to uphold the same ethical standards, and to comply with all applicable employment, labor, and human rights laws to ensure that fair and ethical employment practices are followed in the countries in which they operate. This includes treating employees and contractors with dignity and respect; safeguarding against discrimination; following minimum age requirement laws; respecting the right to freely choose employment; and providing safe working conditions, reasonable working hours and fair compensation.

Our Human Rights Policy Statement and our [Supplier Code of Conduct](#) clearly outlines our expectations for our suppliers, and our commitment to corporate social responsibility and global citizenship.

Furthermore, to support Tosca's commitment to compliance with Section 1502 of the U.S. Dodd-Frank Act and Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017, suppliers are required to supply Democratic Republic of Congo (DRC) conflict-free materials to Tosca, furnish information to assist in determining that work provided to Tosca is DRC conflict-free, and respond to requests for information on sources of supply.

Our Supplier Approval and Review Process was revised in 2022 to encompass ESG risks including human rights and modern slavery in our critical Tier 1 suppliers. We are developing a due diligence program in support, for implementation in 2023.

7. Governance

Tosca's Executive Leadership Team (ELT) has overall responsibility for ensuring that our framework for addressing modern slavery risks complies with our legal and ethical obligations and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with the policies and procedures relating to this framework and are given adequate and regular training on it and on the issue of modern slavery in supply chains.

8. Potential Exposure

Tosca considers its exposure to slavery/human trafficking to be very limited. Geographically, we are not active in high-risk countries and our critical suppliers are typically well-known organizations with high ethical standards and controls.

We have assessed our greatest risk of slavery as being in our third-party wash center service operations and tier two suppliers of raw materials for our own and our third-party manufacturing activities. In response we have developed systems to:

- Identify and assess potential risk areas in our supply chain
- Monitor potential risk areas in our supply chain including the use of sample testing of supplier policies and procedures
- Protect whistleblowers

9. Risk Assessment

Tosca continues to carry out supplier-specific risk assessments to identify high-risk suppliers, segment suppliers by risk level, and evaluate compliance to our Supplier Code of Conduct and Human Rights Policy. In determining the appropriate risk level to assign each supplier, Tosca analyses a number of data points, including the supplier's questionnaire responses and the Global Slavery Index.

10. Training, Awareness and Reporting

Our internal policies and procedures aim to ensure that our employees understand and comply with all laws, rulings, and regulations in their area of business. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, all Tosca employees are required to acknowledge the COC when they join Tosca, and each time the COC is updated. In addition, staff must complete COC training every year.

Employees also are encouraged to seek guidance when they have questions or concerns regarding our policies and procedures through our Ethics Helplines (by country with local language support) or online.

Employees may also use these channels to report any concerns or suspicions related to company or supplier actions along with reporting to a manager or the legal department at legal@tosca ltd.com. The Ethic Helpline is also available to employees of our supply chain to raise issues or concerns to Tosca regarding various compliance issues, including those involving modern slavery.

11. Further Steps

Tosca will continue taking steps to strengthen its commitment to preventing slavery and human trafficking in its business and supply chains. Such efforts will include:

- Providing awareness and training on human trafficking and slavery to our employees and suppliers
- Providing training for procurement personnel to ensure that employees are proficient in identifying signs of human rights violations
- Review policies, procedures and processes to manage our prevention of slavery and human trafficking
- Further developing contract templates and clauses to include due diligence on modern slavery and human trafficking and update them on a regular basis in accordance with new or amended applicable laws in the countries in which Tosca operates

This statement applies to Tosca Services LLC and its UK subsidiaries constitutes Tosca's slavery and human trafficking statement for the financial year ending 2022.



Eric Frank | President and CEO