



The Alumasc Group plc
(Alumasc)

Modern Slavery Act 2015 Transparency Statement 2022

Our statement¹ is made pursuant to Section 54(1), Part 6 of The Modern Slavery Act 2015 (the Act) and sets out the steps The Alumasc Group plc and its subsidiaries (the “Group” or “Alumasc”) have taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Introduction

Modern Slavery including all forms of slavery, servitude, compulsory labour, and human trafficking is an abhorrent abuse of human rights.

Alumasc is committed to improving our practices to ensure that modern day slavery and human trafficking does not take place in any part of our own business or supply chain. Additionally, we expect the same focus from our suppliers, contractors, and any business partners. We believe that the risk of modern slavery in our supply chains is medium to low.

Organisation and Business Model

The Group has three business segments with strong positions and brands in their individual markets: Building Envelope; Water Management; and Housebuilding Products.

We trade mainly through our subsidiaries Alumasc Building Products Limited and Elkington Gatic Limited. Our key brands include: Alumasc Roofing Systems; Blackdown Green roofs; Alumasc Water Management Solutions (AWMS); Gatic, Harmer; Rainclear; Roof-Pro; Skyline; Timloc; and Wade. We are listed on the AIM market, and our suppliers are located principally in the United Kingdom, Europe, and the Asia Pacific region.

We supply sustainable building products to the building and construction industry in the UK and overseas. Our head office is based in Burton Latimer, Kettering. We have a wide range of products which are used in housebuilding and construction, roofing, drainage, and water management.

We believe Alumasc has a medium to low risk of modern slavery and human trafficking. Where materials and goods are supplied from overseas, we regularly review our suppliers and visit their premises (subject to any Covid-19 restrictions) and/or engage remotely. We also

consider suppliers of services within the UK such as security, cleaning, and catering as higher risk areas.

Suppliers

We engage reputable suppliers, with whom we foster long-term relationships and who share our values. New suppliers are risk-assessed and are asked to complete our compliance questionnaire. In addition, we have ongoing oversight and review of key suppliers. We ensure that contracts comply with relevant laws and regulations. Our procurement questionnaire seeks commitment to uphold our values around protecting the environment and socially responsible behaviours. Commitments on opposing modern slavery are also required.

As an absolute minimum we expect the following from our supply chain:

- No forced, bonded or forced/involuntary prison or child labour;
- Workers to have rights for free association and bargaining;
- Clean, safe, and hygienic working conditions;
- Working hours to comply with national law and industry standards;
- The prohibition of physical abuse or discipline, the threat of physical, sexual, or other harassment and verbal abuse or other forms of intimidation.

Supply chain overview and Due Diligence process

The Group already has control processes in place to ensure its businesses comply with statutory regulations, including, where relevant (but not limited to): risk assessments; engagement with suppliers on the Group policy; contractual provisions; factory tours and visits. We also carry out supplier pre-screening where appropriate. We have some suppliers based in countries where because of travel restrictions (due to Covid-19), we have sought to hold Teams calls, to update them on changes to our policies and requirements.

Risk Factors

The highest risk areas are those where low skilled workers are employed overseas and manual roles. Risks also arise when a fee is charged for the supply of labour by an agency.

Our People

Recruitment to fill vacancies is carried out in line with our internal guidance and we seek to ensure we attract a broad range of candidates and that we hire the right person for the role. We also ensure that all new hires demonstrate their Right to Work checks in the countries where we operate. We have recruitment policies and clear standards of conduct in our Employee Handbook.

Training

We have provided training either annually or bi-annually to key employees on the Modern Slavery Act and they are encouraged to report any concerns. In addition, we have an Employee Whistleblowing telephone line that all employees have access to use. This provides a confidential route for employees to seek advice about any issues personally affecting them

or their families and it could also cover any concerns about modern slavery or human trafficking. There have been no such incidents reported in the year ended 30 June 2022.

Anti-Modern Slavery Policy

Alumasc has a zero-tolerance approach to modern slavery and human trafficking. We act ethically and comply with all relevant laws and regulations in all countries where the Group operates. The Group expects its suppliers to hold their own suppliers to the same high standards. Alumasc has an Anti-Modern Slavery and Human Trafficking Policy which includes the International Labour Organization's signs of forced labour which can be found on our website www.alumasc.co.uk. This policy complements the Business Ethics, Whistleblowing and Anti-Bribery & Corruption policies the Company already has in place which can also be found in the [corporate governance](#) section of the website. As part of our Whistleblowing and Modern Slavery training, we include the signs to look for to identify forced labour. Team members are encouraged to raise any concerns and to report this to their line manager or the Group Company Secretary.

Progress in 2022

Training

We have provided an online training module and refresher slides to make sure there is adequate awareness, supplemented by face-to-face training where appropriate. Anti-modern slavery training has been included in our induction training materials and new hires receive face-to-face training on anti-modern slavery and human trafficking.

Performance Measurement

Additional employees have been targeted for training in 2022. We have widened and updated our training plan to include new hires and additional functions within the wider workforce, to ensure there is awareness of modern slavery. We will also look to ensure that suppliers support our aims as set out in the Modern Slavery Statement and our Policies.

Our Policies

Alumasc has the following policies that are all relevant to Modern Slavery, these have been updated and reviewed recently.

- Anti-modern Slavery and Human Trafficking Policy (updated April 2021)
- Anti-bribery and Corruption Policy (updated August 2022)
- Whistleblowing Policy (updated August 2022)

Risk Assessments

We have reviewed how we authorise and check any suppliers of temporary labour. In addition, we have reviewed our suppliers' list to identify any supply chains that are more exposed to a modern slavery risk.

Alumasc's Modern Slavery Statement is made pursuant to s.54(1) of the Modern Slavery Act 2015 and constitutes our Group's Slavery and Human Trafficking Statement for the financial

year ended 30 June 2022. This Statement was approved by the Board of Directors on [23] November 2022 and signed by Paul Hooper, the Chief Executive of The Alumasc Group plc.

Signed on behalf of the Board

A handwritten signature in black ink that reads "G. Paul Hooper". The signature is written in a cursive, slightly slanted style.

G Paul Hooper
Chief Executive

24 November 2022

Footnote:

¹For 2022, this included all relevant active trading subsidiaries according to the requirements of the Modern Slavery Act 2015: The Alumasc Group plc, Alumasc Building Products Limited, and Elkington China Ltd (Hong Kong) and Levolux Ltd (until its sale on 26 August 2022). All the subsidiaries delegated authority to Paul Hooper to sign this Statement on their behalf.