



The Alumasc Group plc

Modern Slavery Act 2015 Transparency Statement 2021

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

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. We believe that the risk of modern slavery in our supply chains is medium to low, however, we continue to focus on our processes and policy. Our business recognises the unacceptable impact of modern day slavery on people and society, and we are committed to prevent these harmful practices. Additionally, we expect the same focus from our suppliers, contractors, and any business partners.

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 the following subsidiaries, Alumasc Building Products Limited and Levolux Limited. Our key brands include: Alumasc Roofing Systems; Blackdown Green roofs; Alumasc Water Management Solutions (AWMS); Gatic, Harmer; Levolux; Rainclear; Roof-Pro; Skyline; Timloc; and Wade. We are listed on the AIM market, and we have suppliers in the United Kingdom, Europe, North America and the Asia Pacific region.

Our strategy helps Alumasc supply building products into the green built environment. Our head office is based in Burton Latimer, Kettering and we have business primarily within the UK that supports the UK market and export sales. We deliver and supply products that are either manufactured in-house or supplied from third parties. We have a wide range of product categories for building products, including but not limited to housebuilding and construction products, roofing, balconies, louvres, drainage, and water management products.

Alumasc is of medium to low risk of modern slavery and human trafficking. We make and supply goods and have oversight of this process. Where materials and goods are supplied from overseas, we regularly review and visit (subject to the prevailing restrictions relating to the COVID-19 pandemic) and/or engage remotely to review our suppliers. We also consider suppliers of services within the UK such as security, cleaning and catering as higher risk areas.

Suppliers

Although slavery is illegal in most countries, it does unfortunately still exist.

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 an ongoing oversight and review of key suppliers. We ensure that contracts are in compliance with relevant laws and regulations. We look to ensure that our suppliers complete our procurement questionnaire that seeks a commitment to uphold our requirements around protecting the environment and social behaviours in our supply chain. 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

Alumasc is committed to have a transparent approach to ensure that its businesses and supply chains adhere and comply with the prevention of any aspect of slavery, as set out in The Modern Slavery Act 2015. 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.

Risk Factors

The highest risk areas are those where low skilled workers are employed in a high risk country. 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 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 over a number of years to key employees on the Modern Slavery Act and they are encouraged to report any concerns. In addition, we have an Employee Whistle-blowing 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 2021.

Anti-Modern Slavery Policy

Alumasc has a zero-tolerance approach to modern slavery and human trafficking and is committed to act ethically and to comply with all laws and regulations which are relevant to the Group's businesses and 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 that was revised on 29 April 2021 to include the ILO's signs of forced labour which can be found on the website www.alumasc.co.uk. This policy complements the Business Ethics, Whistle-blowing 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 Whistle-blowing 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 to the Group Company Secretary.

Progress in 2021

Training

We provide an online training module and have prepared refresher slides to make sure there is adequate awareness. Anti-modern slavery training has been added to our induction training materials. New hires receive face-to-face training on anti-modern slavery and human trafficking and slides are provided to facilitate the training.

Performance Measurement

Additional employees have been targeted for training in 2021, we are widening our training plan to include new staff and more of 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.

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 particular supply chains that are more exposed to a modern slavery risk.

This 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 2021. The Statement was approved by the Board of Directors on 25 November 2021 and signed by Paul Hooper the CEO 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

25 November 2021

Footnote:

¹For 2021, 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, Levelux Limited, Levelux Inc and Elkington China Ltd (Hong Kong). All the subsidiaries delegated authority to Paul Hooper to sign this Statement on their behalf.