



The Alumasc Group plc

Modern Slavery Act 2015 Transparency Statement 2020

Our statement¹ is made pursuant to Section 54, Part 6 of The Modern Slavery Act 2015 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 its supply chains or in any part of its business.

Introduction

Alumasc is committed to ensuring that modern day slavery and human trafficking does not take place in its supply chain. Our business recognises the unacceptable impact of modern day slavery on people and society and we are committed to prevent these harmful practices.

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.

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 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 products 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 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

We engage reputable suppliers, with whom we have long-term relationships and share the same values. We ensure that third parties after a risk assessment 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.

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.

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 Whistleblower 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 incidents reported in 2020.

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 a Modern Slavery and Human Trafficking Policy which can be found on the 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.

Progress in 2020

Training

We provide an online training module and have prepared refresher slides to make sure there is adequate awareness. Modern slavery training has been added to our induction training materials.

Performance Measurement:

Additional employees have been targeted for training in 2020, we are widening our training plan to include new staff and more of the wider workforce, to ensure there is awareness of modern slavery.

Risk Assessments:

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

Approved by the Board of Directors

Signed on behalf of the Board



G Paul Hooper
Chief Executive

11 November 2020

Footnote:

¹For 2020, 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, Levolux Limited, Levolux Inc and Elkington China Ltd (Hong Kong).