

Modern Slavery & Human Trafficking Statement (2021)

Introduction

This statement describes the steps taken by Etex Building Performance Limited to understand potential modern slavery risks and to ensure the absence of slavery and human trafficking in its own business and in its supply chains in the trading year 1 January 2021 to 31 December 2021.

Some information reported in earlier years has been included to provide a comprehensive summary of current policy and controls. This statement has been prepared in accordance with the latest guidance issued by HM Government (October 2017).

As part of the international Etex Group of Companies, Etex Building Performance recognises its ethical and moral responsibilities to uphold the highest standards in human rights. This includes eliminating any form of slavery or human trafficking from corporate activities or supply chains.

Etex Group became a member of the UN Global Compact as a demonstration of this commitment to human rights and fair labour practices. During 2020, Etex Group introduced a new focus on the UN Sustainable Development Goals (SDG's) most relevant to its activities. Amongst those selected is SDG8 "Decent Work & Economic Growth" which includes a commitment to protect labour rights and promote safe and secure working environments for all workers.



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|-------------------------------|---|
| 3 Good health and wellbeing | 8 Decent work and economic growth |
| 4 Quality education | 9 Industry, innovation and infrastructure |
| 5 Gender equality | 11 Sustainable cities and communities |
| 6 Clean water and sanitation | 12 Responsible consumption and production |
| 7 Affordable and clean energy | 13 Climate action |



Organisational Structure

Etex Building Performance was formed in 2017. With 560 employees, we supply solutions for dry construction within UK and Ireland. The company operates across 3 corporate brands:

Siniat specialises in the manufacture and supply of gypsum-based products and systems. It operates manufacturing plants in Bristol and Ferrybridge (Yorkshire). The main products produced are plasterboard, plaster coving and associated gypsum-based compounds used in drywall building systems. Alongside directly manufactured goods, various resale products are supplied into the market, notably metal framing, fixings and other drywall accessories.

Promat is a specialist supplier of passive fire protection products and systems. These are mainly manufactured outside the UK in facilities owned and operated by the Etex Group.

FSI Limited develops, manufactures and supplies fire stopping coatings and compartmentation systems. Acquired by Etex in 2020, it is based in Measham (Derbyshire) and operates as a fully owned subsidiary.

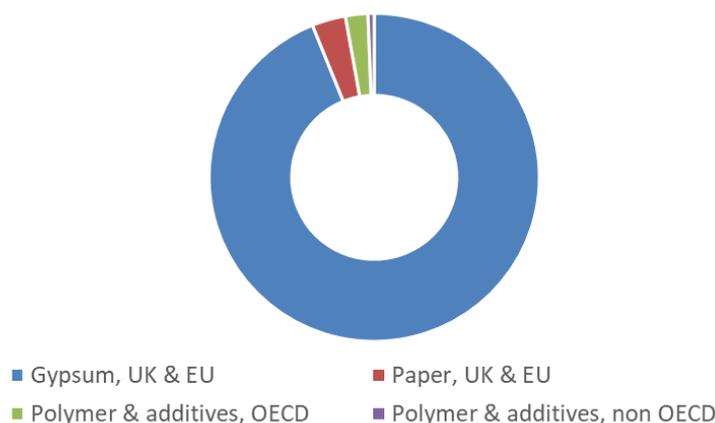
Also included within the scope of this report is **Crucible Gypsum Recycling**. This subsidiary produces secondary gypsum from post-consumer plasterboard and is a supplier to the parent company. The sourcing and procurement of materials and services for the UK businesses is managed by the Etex European purchasing organisation and which serves multiple companies and divisions across the Group.

Nature of Supply Chains

In relation to **Siniat** products, around 98% of raw materials comprise of gypsum or paper sourced from the UK and Europe. The proportion of by-product gypsum sourced from coal-fired power stations is being progressively replaced by secondary material recovered from construction (4% and 24% of gypsum used in 2021, respectively). The remainder is quarried gypsum. The required additives have more varied supply chains, but these are predominantly contained within low risk OECD countries.

Figure 1:

*Sourcing of Direct Raw Materials
by volume (all brands) 2021*



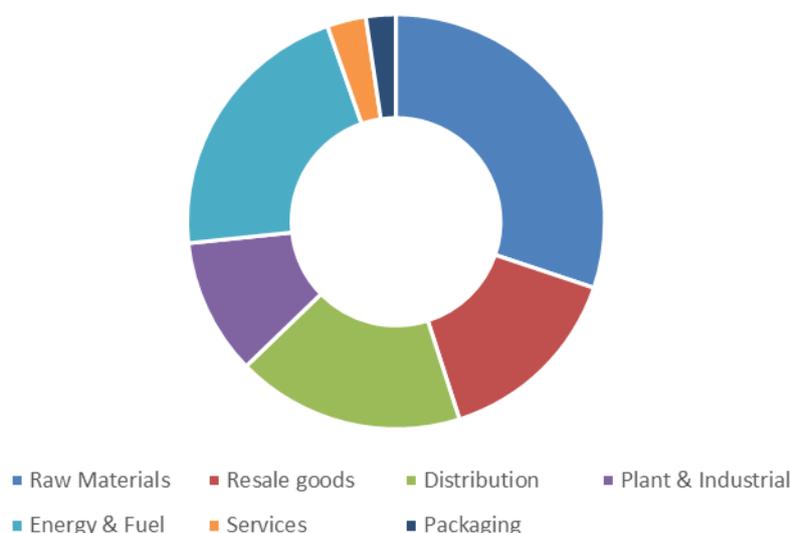
The distributed **Promat** products are mostly manufactured in facilities owned and operated by the Etex Group and mainly within OECD countries. According to Etex policy, all the factories are certified to ISO45001, thereby receiving regular scrutiny of welfare conditions from independent auditors. In addition, these plants apply the Etex Way Code of Conduct to their supply chains.

Polymers and chemical mixtures are the main raw materials for **FSI Limited**. These are traded globally with a sourcing split of over a half from OECD countries. **Crucible Gypsum Recycling** receives material segregated by major UK-based waste management companies, so enjoys a short supply chain from the point of recovery.

Etex Building Performance typically uses over 750 separate suppliers of materials and services annually. A breakdown of purchasing categories by spend is shown in Figure 2. Around 20 suppliers provide direct labour within plants alongside our own employees, mainly providing services such as cleaning, engineering maintenance and logistics.

Figure 2:

Purchasing Category
by spending, 2021



Organisational Policies

Policies and other arrangements relevant in relation to slavery & human trafficking include:

- **Responsible Sourcing Policy** - established in 2010 and communicated to all suppliers. With respect to human rights this policy commits the company to adhere to the UN Global Compact & ILO Conventions and defines a similar expectation in the supplier base.
- **BES6001 Certification for Responsible Sourcing of Construction Products** - maintained since first certification in July 2011, with annual third-party assessment of the business and its supply chain. Currently held at the “Very Good” rating level.
- **"Etex Way" Code of Conduct** - applied since acquisition of the company by the Etex Group in 2011, with a major upgrade in 2018. The Code requires high standards of ethical behaviour in relation to human rights. For tighter control of minimum acceptable standards for legal and ethical compliance in the supply chain, Etex Group has newly published in 2022 a separate **Supplier Code of Conduct**.
- **Policy on Modern Slavery & Human Trafficking** - first issued in 2016 and communicated to all suppliers. The policy outlines commitments, expectations for compliance with the

UN Global Compact and ILO Conventions in supply chains and the steps to be taken to implement the policy. It is reviewed annually by Executive Management and remains unchanged this year.

- **Etex Group UK Purchasing Policy** – underwent a major revision in 2020 to support the current arrangements for sourcing via the Etex Regional purchasing organisation. It includes provisions for evaluating the social and ethical performance of potential supply partners and compliance with the Etex Code of Conduct.
- **Human Resources Policies**, including rules on the use of specified, reputable and verified employment agencies for the sourcing of labour.
- **Recognition of Trade Unions** at Bristol & Ferrybridge plants and distribution depots.
- **Etex Speak Up Policy** – new Etex Group policy issued in December 2021. This implements an independent whistle-blowing service across the Group for the confidential reporting of any employee concerns. This supplements the existing UK arrangements and further reduces supply chain risk where sourcing is managed overseas.
- **Promotion of the UK Modern Slavery Helpline** to facilitate confidential reporting by workers of any concerns they may have.

Due Diligence

The company undertakes due diligence as part of the evaluation of new supply partners with regular reviews of supplier performance. As part of building a new purchasing organisation in 2019, screening for modern slavery controls and the protection of human rights were integrated into vendor assessment and contractual tendering processes at European regional level. This ensures that where materials and services are supplied into the UK from Etex companies overseas there is assurance of the Tier 2 supplier.

A due diligence audit has been carried out on our natural gypsum supply chain. This was selected on account of the agreed priority of materials incorporated into our products, the volume (over 65% of raw material by tonnage) and the risk known to exist in the region of supply. The assessment covered materials extraction at the quarry in southern Spain and gypsum transport to our facilities in the UK.

Employment conditions are heavily regulated by the local Mines Inspectorate and Etex Building Performance confirms a good level of compliance with its responsible sourcing policies within this supply chain. No temporary workers are employed and there is little sub-contracting. All of the ISO management system certificates of the Tier 2 supplier operating the quarry and transport activities were renewed following independent audit early in 2021. This includes ISO45001 Occupational Health & Safety certification covering employee welfare and wellbeing.

All communications opportunities are taken in meetings with supply chain partners to raise awareness where necessary. In view of the challenge of tracing secondary gypsum collected from multiple construction sites and waste industry sources, Modern Slavery Act requirements have been discussed with recyclers and the need for due diligence along the supply chain.

Assessing & Managing Risk

The **risk profile** of the supply chain by product category (or sector) and geographical location is kept under review, informed by evidence collected from suppliers. The implementation of the Modern Slavery Statement Registry provides new opportunities for screening and the evaluation of supply chain risk. The first priority for assessment remains materials incorporated into Etex products placed on the market.

Large volume supplies are dominated by gypsum and paper, where several trends are seen. In line with moves towards a more circular economy, the sourcing of by-product gypsum from a small number of industrial producers is being replaced by supplies of post-consumer gypsum recovered and recycled from a larger number of construction sites with more diffuse traceability. As the decline in by-product availability is faster than the growth in recycling infrastructure, there is temporarily an increase in rock gypsum being used. As this is from an audited and verified source, the overall supply chain risk remains little changed.

At **lower volumes** a small proportion of materials are sourced with supply chains extending back to non-OECD countries, including Ukraine, South Africa and China. In terms of “at risk” sectors, extractive industries in any of these locations are monitored. The requirement to notify the HSE of imported substances under the UK REACH regulation in 2021 provided a useful opportunity to map many of these supply chains. This included mica, an ingredient linked with past modern slavery concerns, which was traced to satisfactory extraction locations in Spain and Finland.

Aside from materials integrated into products, one of the sectors known to be high-risk, is our sourcing of garments with supply chains extending to south-east Asia. Adequate assurances have been received from first tier suppliers of ethical controls preventing slavery and forced labour. The evidential basis deriving from supplier audits appears to be satisfactory.

Elsewhere in the “indirects” purchasing category, attention is being paid to the public supply chain statements of major players in the computing, communication and automotive sectors. Aware of concerns publicised in relation to certain minerals and those used in electrical batteries, we have checked the proposed supply chain for the planned electrification of our fork-lift fleet. Lithium ion batteries are to be sourced from a global manufacturer actively involved in improving the cobalt supply chain, working in partnership with mining communities and regulatory bodies.

Training & Awareness

The concepts of responsible and ethical sourcing are included within the business sustainability module of the company’s induction training for new employees. New staff receive a copy of the **Etex Way Code of Conduct** and an explanation of its contents within the context of their role in the business. Compliance is a contractual requirement for all employees and a reference to the Modern Slavery Act has been added to the company’s Employee Handbook. Existing employees

also received copies of the Etex Way document on its issue in 2018. Annual refresher training has been introduced for all staff, with understanding of the Code being tested and recorded.

Following the acquisition in 2020 of FSI Limited, Etex policies are being progressively implemented within the new subsidiary company. Training in the Etex Code of Conduct and Modern Slavery awareness form part of this ongoing programme.

Company purchasing staff receive training on compliance with the Modern Slavery Act via their professional body, the Chartered Institute of Purchasing & Supply (CIPS). Equally human resources managers have received continuous professional development training on the Act. The company became a full member of the **Supply Chain Sustainability School** during 2021. This gives access to a suite of online learning resources on Modern Slavery tailored for our industry sector.

General awareness of modern slavery among the company's staff is maintained by various methods, including the display of posters and articles in internal magazines and intranet sites. Modern Slavery has been included within a monthly safety conversation undertaken by managers and we plan to use future staff engagement settings to refresh the messaging. One of the objectives of these communications is to make employees aware of the **UK Modern Slavery Helpline** to whom any concerns may be reported on a confidential basis.

This has been supplemented by the launch of an independent whistle-blowing service which is available to all employees and may also be used for the reporting of concerns.

Future Actions (2022)

We are committed to ethical, legally compliant, and socially responsible business management. We expect our suppliers to share this commitment and make reasonable efforts to promote the compliance of their own suppliers and subcontractors. As a condition of doing business with Etex we expect all suppliers to operate in a manner that complies with the standard set in the Etex [Suppliers Code of Conduct](#). This new Code of Conduct published in 2022 has a key focus on health and safety, human rights and labour practices, compliance and business ethics, and sustainability and environment. The Code of Conduct will be issued to all key active suppliers as an integral part of our contractual relationship with them. All Etex suppliers must adhere to internationally recognised standards of responsible business conduct and fully commit to the recommendations contained in the Code. Any non-conformance to the code by any supplier is reviewed by Etex.

As part of our commitments to sustainability, Etex Group has begun working with **EcoVadis**. EcoVadis is a sustainability ratings service provider that assesses a business's supply chain network across 21 sustainability criteria in four critical areas: environment, ethical business practices, sustainable procurement, and labour and human rights. This rating tool employs methodology that is founded on international standards including Global Reporting Initiative, the United Nations Global Compact, and the ISO 26000 – Guidance on Social Responsibility. In 2021, Etex Group itself has been assessed by EcoVadis, for which the results will appear in the Etex Sustainability Report to be published in 2022.

Etex Building Performance received in 2020 planning permission to construct a **new manufacturing facility** to be built at Bristol. Bidding contractors were screened on labour policies as part of the wider qualification process. Construction will take place throughout 2022. Arrangements are in place to ensure that all plant machinery and construction material supplies are subject to scrutiny for modern slavery risks alongside project labour.

Company performance in responsible sourcing is independently assessed annually under the **BRE Standard BES6001** (“*Framework Standard for the Responsible Sourcing of Construction Products*”). During 2021 the company has actively engaged with BRE on its consultation for updating the standard (version 4). A programme of work is foreseen to maintain the company’s rating level once the updated standard is issued.

Approval

This statement has been approved by the executive committee of Etex Building Performance Ltd.



Neil Shaw

Country Manager, Etex Building Performance Limited

June 2022