

Modern Slavery & Human Trafficking Statement (2017)

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 2017 to 31 December 2017.

This statement has been prepared in accordance with the latest guidance issued by HM Government (October 2017). It therefore describes developments in the reported year only, building on the first statement published for 2016. Readers are referred to the report available at this [link](#) for a wider account of our business and its supply chains.

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

Organisational Structure & Supply Chains

Etex Building Performance Ltd was formed on 3 January 2017 when Siniat Limited changed its name and on the same date acquired the Promat passive fire protection business. Eos Facades Limited is a subsidiary of Etex Building Performance Limited and supplies steel framing solutions from a manufacturing facility in Newton Aycliffe. Together these brands supply solutions for dry construction in the UK & Ireland.

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 of the factories are certified to OHSAS18001, thereby receiving regular scrutiny of welfare conditions from independent auditors. In addition, these plants apply the Etex Code of Business Conduct and Ethics to their supply chains.

The Etex Building Performance Ltd policy on Modern Slavery & Human Trafficking applies to the Eos Facades UK manufacturing plant. Its main raw material, steel, is traded globally with a sourcing split of one third from OECD countries in 2017. Overall these organisational changes have resulted in the addition of fewer than 20 Tier 1 suppliers of materials.

Organisational Policies

There has been no change in relevant organisational policies over the reporting period. The company Executive Committee has reviewed the Etex Building Performance [Policy on Modern Slavery & Human Trafficking](#) and confirmed it remains appropriate for the business in 2018.

Due Diligence

In accordance with our risk profiling, 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 quantum (over 50% 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. The quarry and transport activities are operated by a Tier 2 supplier newly certified to OHSAS18001 for Occupational Health & Safety Management. This includes employee welfare and wellbeing within scope and with regular third party audit going forward.

Other Risk Management Measures

With regards to our own business we have examined the controls in place linked to our direct labour force. In compliance with Immigration Act 2016, we have always verified the right to work in the UK for all employees at the time of recruitment. In line with construction industry practices, and campaigns promoted by BuildUK and other industry bodies, we will now take steps to ensure full compliance within all organisations providing labour services to us, including contractors and temporary employees. We are fully aware that Right to Work checks are unable to detect forced labour amongst workers legitimately working in the UK, therefore we have also strengthened other internal processes, as described below.

Training & Awareness

Since the Modern Slavery Act came into force we have promoted awareness among our company staff by various methods, including the availability of the ***UK Modern Slavery Helpline*** to whom concerns could be reported on a confidential basis.

Alongside this Etex Building Performance Ltd has now implemented a new independent whistle-blowing service for use by employees for confidential reporting. This provides for the raising of any concerns over forced labour in company activities alongside other purposes linked to the Etex Code of Business Conduct & Ethics.

Approval

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



Neil Ash

Managing Director, Etex Building Performance Limited.

June 2018