

## **Modern Slavery & Human Trafficking Statement (2018)**

### **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 2018 to 31 December 2018.

This statement has been prepared in accordance with the most recent guidance issued by HM Government (October 2017). It therefore describes developments in the reported year only, building on earlier annual statements. Its scope includes subsidiary companies. Readers are referred to the reports available [on line](#) 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. This includes eliminating any form of slavery or human trafficking from corporate activities or supply chains.

### **Organisational Structure & Supply Chains**

Following the formation of Etex Building Performance Ltd in 2017, only minor structural change occurred during 2018. Crucible Gypsum Recycling Limited became a subsidiary company alongside Eos Facades Limited. This new subsidiary produces secondary gypsum from post-consumer plasterboard and is a supplier to the parent company.

Crucible Gypsum Recycling receives material segregated by major UK-based waste management companies so enjoys a short supply chain from the point of recovery.

This development is indicative of the general and continuing trend in sector supply chains away from gypsum sourced from power stations towards gypsum from quarries and recycled from the built environment.

### **Organisational Policies**

At corporate level, Etex Group has introduced a strengthened Code of Conduct. This “Etex Way” Code extends corporate standards beyond organisational boundaries to expectations placed on suppliers and other business partners.

Our UK policy is already compliant with the new Code but the additional controls are relevant to our sourcing from Tier 2 suppliers via Etex Group companies. Our Executive Committee therefore updated the Code of Conduct reference within the UK policy during its annual review. Senior management confirmed that the Etex Building Performance [Policy on Modern Slavery & Human Trafficking](#) remains otherwise appropriate for the business in 2019.

## **Due Diligence**

During the past trading year new vendors have been systematically checked for compliance with ILO Standards and adherence to the UN Global Compact in line with our policy.

On contracted labour we are switching to a market-leading tool for supplier assessment including human rights aspects of corporate social responsibility.

## **Risk Assessment**

The industry trends in gypsum sourcing highlighted above indicate declining risk of modern slavery in our supply chain. This is because an increasing proportion of material is sourced from the Spanish quarry audited in 2018 or from our directly owned recycling subsidiary.

The new “Etex Way” Code of Conduct will lead to increasing due diligence by Tier 1 suppliers where these form part of the Etex Group.

## **Measuring Effectiveness**

Company performance in responsible sourcing is independently assessed annually under the BRE Standard BES6001 (*“Framework Standard for the Responsible Sourcing of Construction Products”*). During 2018 company certification was raised to the highest 4-star “Excellent” level.

## **Training & Awareness**

Awareness of the revised “Etex Way” Code of Conduct has been promoted for new and existing employees. New staff receive and sign for copies of the Code, and the Employee Handbook has been updated and re-issued to make existing staff aware.

## **Approval**

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



*Neil Ash*

**Managing Director, Etex Building Performance Limited.**

**September 2019**