



The Alumasc Group plc
(Alumasc)

Modern Slavery Act 2015 Transparency Statement 2024

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

Modern Slavery including all forms of slavery, servitude, compulsory labour and human trafficking is an abhorrent abuse of human rights.

Alumasc is committed to the continuous improvement of 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. Additionally, we expect the same focus from our suppliers, contractors, and any business partners. We are committed to full respect for anyone working for us. Our assessment is that the risk of modern slavery in our supply chains is low to medium.

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, Aluminium Roofline Products Limited and Elkington Gatic Limited. Our key trade names and brands include: Alumasc Roofing Systems; Blackdown Green Roofs; Alumasc Water Management Solutions (AWMS); Gatic, Harmer and Slotdrain; Rainclear; Roof-Pro; Skyline; Timloc; Wade; ARP; Mustang Guttering; Legacy; Sentinel; Legion; Trueline; Britannia; Exitus; Colonnade; Mustang; and Alstream. We are listed on the Alternative Investment Market (AIM) of the London Stock Exchange, and we have suppliers in the United Kingdom, Europe, the Middle East, North America and in Asia. We hold global patents and brands and sell products worldwide.

Our strategy is to supply environmentally efficient building products into the built environment. Our head office is based in Burton Latimer, Kettering and we have businesses, primarily located within the UK, that support 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, roofing, drainage, and water management products.

Assessing the Risk of Modern Slavery

Our risk assessment is based on the following criteria: supply chain from higher risk countries; products and/or services using low skilled labour, agency or temporary staff; and the ability to review suppliers. Based on the above we assess that we have a 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 monitor their performance and regularly review, visit and/or hold videoconference meetings with our suppliers. We also consider suppliers of services within the UK such as security, cleaning, and catering as higher risk areas. We are proactive in making sure our workforce and suppliers are aware of the potential risks and their responsibilities in managing these.

Acquisition of ARP in the year

On 21 December 2023, Alumasc purchased ARP, a manufacturer and distributor of specialist metal rainwater and architectural aluminium goods based in Leicester, UK, comprising ARP Group Holdings Ltd, Aluminium Roofline Products Limited, Rainwater Online Holdings Limited, Cast Iron Superstore Ltd and Envelope Solutions Ltd. During the year ARP's employees have completed the online training module on anti-modern slavery and they are introducing the same online procurement system as operated by the Alumasc Water Management Solutions division.

Suppliers

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 online and paper compliance questionnaire. In addition, we have an ongoing oversight and review of key suppliers. We ensure that contracts follow relevant laws and regulations. We look to ensure that our suppliers commit to uphold our requirements on health & safety, protecting the environment, and social behaviours. 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.

We are developing a Supplier Code of Conduct with ARP to include the above together with other expectations.

Supply chain overview and due diligence process

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 procurement professionals visit both UK and overseas suppliers.

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 constantly review our policies to protect the fundamental rights of our staff.

We seek to increase employee inclusion and promote equality for opportunities. We also ensure that our employees are respected, are treated fairly and that their fundamental human rights are protected.

We mainly direct recruit and manage our employees. Most of our staff are based in the UK, where although modern slavery exists, it is a lower risk than some other countries. We require all staff agencies to confirm that they have written employment contracts with staff, that staff had not had to pay for the opportunity to work and are legally entitled to work in the UK.

Zero-tolerance is shown towards any slavery and forced labour.

Training

We provide online and in person training either annually or bi-annually to key employees on the Modern Slavery Act and they are encouraged to report any concerns. During the year a number of senior staff joined the Supply Chain Sustainability School and training has helped to improve and embed our anti-modern slavery procedures.

In addition, we have an Employee Whistleblowing 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 allows them to report any concerns about modern slavery or human trafficking. The Board confirms there have been no such incidents reported in the year ended 30 June 2024.

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 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, 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. As part of our Whistleblowing 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 2024

Training

We have provided a new online training module and refresher slides to make sure there is adequate awareness, update training was provided in the year to new employees and key personnel in procurement. Online training has been provided to all the employees of the ARP group. New hires receive face-to-face training on anti-modern slavery and human trafficking and slides are provided to facilitate the training.

Performance Measurement

More employees have been targeted for training in 2024, we have widened and updated our training plan to include new hires and more of the wider workforce (where appropriate), 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.

Our Policies

Alumasc has the following policies that are all relevant to Modern Slavery, these are:

- Anti-bribery and Corruption Policy (updated August 2022)
- Whistleblowing Policy (updated August 2022)

All our sites display 'Speak Up' Posters which publicise our Employee Whistleblowing Policy including details of an independent telephone line.

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 supply chains that are more exposed to a modern slavery risk. We have reviewed our new supplier "onboarding" processes, and this now includes additional assurance questions.

Alumasc's Modern Slavery Statement (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 2024. This Statement was approved by the Board of Directors on 28 November 2024 and signed by Paul Hooper the CEO of The Alumasc Group plc.

Signed on behalf of the Board



G Paul Hooper

Chief Executive

28 November 2024

Footnote:

¹For 2023/24 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, ARP Group Holdings Ltd, Aluminium Roofline Products Limited, Rainwater Online Holdings Limited, Cast Iron Superstore Limited and Envelope Solutions Ltd; Elkington China Ltd (Hong Kong) and Gatic (Middle East) FZ-LLC. All the subsidiaries delegated authority to Paul Hooper to sign this Statement on their behalf.