

Modern Slavery and Human Trafficking Statement – 2022

Introduction

Eurocell plc, and all its subsidiaries, (“Eurocell”), is committed to preventing slavery and human trafficking within its business activities, and to ensuring its supply chains are also free from slavery and human trafficking.

This statement sets out Eurocell’s actions to understand the potential modern slavery risks related to its business and the steps it has taken to help ensure there is no slavery or human trafficking within its own business and its supply chains.

This statement covers Eurocell plc (reg. no. 08654028), Eurocell Profiles Ltd (reg. no. 02649790) and Eurocell Building Plastics Ltd (reg. no. 03071407) and relates to actions and activities during the financial year ended 31 December 2022.

Organisation structure and supply chains

Eurocell is a leading UK manufacturer, distributor and recycler of PVC building products.

We operate our business through two divisions, employing c.2,000 people in total, which reflect the principal routes to market for our products:

- The **Profiles division** manufactures extruded rigid PVC profiles and foam PVC products. We make rigid and foam products using virgin PVC compound, the largest component of which is resin. Our rigid products also include recycled PVC compound, produced at our market-leading recycling facilities.

Rigid PVC profiles are sold to third-party fabricators, who produce windows, trims, cavity closer systems, patio doors and conservatories for their customers. Foam PVC products are used for roofline and are supplied to customers through our nationwide branch network in the Building Plastics division (see below).

- The **Building Plastics division** distributes a range of Eurocell manufactured and branded foam PVC roofline products and Vista doors, as well as third-party manufactured ancillary products. These include items such as sealants, tools and rainwater products (“traded goods”), as well as windows fabricated by third parties using products manufactured by the Profiles division.

Distribution is through our national network of over 200 branches to installers, small and independent builders, house builders and nationwide maintenance companies. The branches also sell roofline products to independent wholesalers.

Many of the c.4,000 product lines stocked in each depot are manufactured by Eurocell, giving us full control over our supply chain so we can deliver consistent service and quality benefits to our customers.

Our supply chains include the sourcing of both raw materials and ready-made products related to the PVC manufacturing. Our main raw materials are sourced from manufacturers in the UK, Europe and the US. Traded goods are directly sourced in the UK, from suppliers who are manufacturing throughout the world.

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Policies in relation to modern slavery and human trafficking

We operate the following policies and procedures to identify modern slavery risks and prevent slavery and human trafficking in our operations:

- **Modern Slavery and Human Trafficking policy**

Our Modern Slavery and Human Trafficking policy outlines our zero-tolerance approach to modern slavery of any kind within our operations and supply chain. It sets out the standards we expect of everyone working with us or on our behalf including employees, contractors, suppliers and other business partners and provides guidance on reporting any suspicions or concerns relating to compliance with the policy.
- **Whistleblowing policy**

We encourage all our employees, customers and other business partners to report any concerns related to Eurocell's direct activities, or its supply chains. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for individuals to make disclosures, without fear of retaliation.
- **General principles of business conduct**

Our principles of business conduct make clear to employees the actions and behaviour expected of them when representing Eurocell. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.
- **Supply chain**

Our supply chains include the sourcing of both raw materials and ready-made products related to PVC manufacturing. Our main raw materials are sourced from manufacturers who operate mainly in the UK, Europe and the US. Traded goods are directly sourced in the UK, from suppliers who are manufacturing throughout the world.
- **Recruitment and use of agency staff**

We aim to only use specified, reputable employment agencies to source labour and always verify the practices of any new agency we use before accepting workers from that agency. Eurocell ensures that all potential employees have the legal right to work in the UK and that relevant employment legislation is adhered to.

Our policies are reviewed and, if necessary, amended regularly to ensure that they continue to meet the Company's legal obligations and reflect best practice.

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Due diligence processes

Our first-tier suppliers have been risk assessed and we have ensured compliance with our revised terms and conditions incorporating the Modern Slavery Act 2015 provisions. New suppliers are automatically issued with our revised terms and conditions incorporating provisions to help Eurocell achieve compliance with the Modern Slavery Act 2015 provisions.

We ensure that our suppliers confirm that they act ethically and within the law in their use of labour. Where suppliers are unable to demonstrate this standard, we work with them to identify gaps and implement corrective actions within a reasonable timescale. Failure to comply results in the termination of the business relationship.

Where possible, we build long-standing relationships with local suppliers and make clear our expectations of business behaviour.

We expect our suppliers to, at least, adopt 'one-up' due diligence on the next link in the supply chain. It is not practical for us (and every other participant in the supply chain) to have a direct relationship with all links in the supply chain.

The heads of each department/subsidiary are responsible for compliance in their respective areas of responsibility and for their supplier relationships.

Risk assessment and management

We assess and classify the risk of all new suppliers and periodically assess and classify the risk of our existing key suppliers, in line with our Procurement policy. All new/existing suppliers have been assessed as either low or medium risk.

Where we identify high risk suppliers, we conduct an annual risk assessment to identify any potential gaps and corrective actions required, in line with the risk management process, based on the responses received.

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Key performance indicators to measure effectiveness of steps being taken

We have effective measures to ensure our compliance with this statement, and our Modern Slavery and Human Trafficking policy, and no compliance issues have been noted.

Examples of these measures include:

- Monitoring, and investigating, the number and nature of instances of non-compliance with the Modern Slavery and Human Trafficking policy.
- Monitoring, and investigating, the number and nature of whistleblowing cases which relate to our Modern Slavery and Human Trafficking policy.
- Monitoring, and investigating, the number and nature of instances of non-compliance with our recruitment policies and procedures to identify potential employees that do not have the legal right to work in the UK.
- Monitoring the completion of training by each relevant staff member in relation to the Modern Slavery and Human Trafficking policy and the risks involved.
- Monitoring the results of our risk-assessment of key suppliers, to identify areas of concern or highlight trends of increasing risk which require addressing.

Training on modern slavery and trafficking

We are equipping Eurocell staff with the skills that are needed to understand modern slavery. Our induction process for Eurocell staff is inclusive of mandatory training in relation to our Modern Slavery and Human Trafficking policy.

Our Modern Slavery and Human Trafficking statement is approved by the Board on an annual basis.

Darren Waters
Chief Executive Officer
Eurocell plc