

## Modern Slavery and Human Trafficking Statement – 2024

### Introduction

Modern Slavery is a term used to describe the criminal act of exploiting an individual for personal or commercial gain. Whether tricked, coerced, or forced, these individuals lose their freedom. Modern Slavery includes but is not limited to human trafficking, forced labour and debt bondage.

Eurocell plc, and all its subsidiaries, (“Eurocell”) takes a zero-tolerance stance against slavery in all its forms and outlines here its commitment to help end such appalling restrictions on human liberty. 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 2023.

### 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 (Branch Network)** 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 210 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.

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Our supply chains include the sourcing of both raw materials and ready-made products related principally 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.

### 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 zero-tolerance stance against modern slavery of any type within our operations and supply chain is outlined in our Modern Slavery and Human Trafficking policy. It lays out the expectations for all parties that work with us or on our behalf, including suppliers, contractors, employees, and other business partners. It also offers information on how to report any suspicions regarding adherence to 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 code of conduct clearly outlines the behaviours and actions employees are expected to demonstrate while representing Eurocell. While managing our supply chain, we make an effort to ensure they also uphold the highest standards of employee behaviour and ethics.

- 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 within the UK or globally.

- 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 terms and conditions, which incorporate provisions to help Eurocell achieve compliance with the Modern Slavery Act 2015. New suppliers are automatically issued with our terms and conditions.

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. As a company our position does not tolerate modern slavery and any violation of the laws relating to the Modern Slavery Act 2015 and the use of slave labour will lead to the termination of our contracts with such suppliers. 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.

We take any allegations of modern slavery, as existing within our immediate business or wider supply chains, extremely seriously as we consider modern slavery to be a clear violation of the most basic of human rights. All concerns and reports will be fully investigated and, where appropriate, remedial action will be taken by the Company.

### **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. During the financial year ending 31 December 2023 there were no reports received through the whistleblowing process (2022:0, 2021:5), and therefore no significant trends were identified.

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- Monitoring, and investigating, the number and nature of whistleblowing cases which relate to our Modern Slavery and Human Trafficking policy. No violations on human rights have been reported in 2023.
- 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 new staff is inclusive of mandatory training in relation to our Modern Slavery and Human Trafficking policy.

### **Future improvements**

The risk of modern slavery is dynamic. We will continue to be proactive in improving our knowledge of the subject and continually develop our plans to reduce this risk. We will report on the progress of these plans in future Modern Slavery Statements.

This statement has been approved by the Board of Eurocell plc.

**Darren Waters**  
Chief Executive Officer  
Eurocell plc