

Modern Slavery Statement

Etex UK Insulation Ltd recognise our moral and ethical responsibilities to do all that we can to ensure that our business and supply chain is slavery free. We recognise that modern slavery and human trafficking is a serious global issue and affects all industries and sectors. We have processes in place to prevent this directly happening within our business and we will continue to review our engagement with our customers, suppliers and service providers to work towards tackling modern slavery, throughout our supply chains.

This statement sets out the actions that we have taken to understand the modern slavery risks related to our business, and the steps we will look to implement to prevent slavery and human trafficking.

Structure and business organisation

We are a Scottish manufacturer of mineral glass wool insulation which supplies product to the construction and house-building industries. Etex UK Insulation Ltd employs 190 people nationally.

The Company purchases glass cullet, raw materials, chemicals and packaging to manufacture our products.

We aim to establish a relationship of trust and integrity with our suppliers, building on mutually beneficial factors. Our supplier selection process involves due diligence of the suppliers respect for Modern Slavery Act and compliance with health, safety and environmental standards.

Etex UK Insulation Ltd will never knowingly tolerate slavery or forced labour. No one shall be required to perform forced or compulsory labour for or on behalf of Etex or its partners. Since our company registration in 1987, we have not been made aware of any allegations of human trafficking / slavery activities against our company or any of our suppliers, but if we were, then we would act immediately to work with our supplier and any necessary authorities to resolve.

Policies in Relation to Slavery and Human Trafficking

This policy confirms Etex UK Insulation Ltd is committed to ensuring that there is no modern slavery or human trafficking in any part of its business or its supply chains. Etex UK Insulation Ltd operates the following policies for preventing human slavery and trafficking in our operations:

- Whistleblowing policy: we encourage all employees, customers and suppliers to report any suspicions of human slavery without fear of retaliation.
- Code of Conduct reflects our commitment to acting lawfully, ethically and with integrity in all our business relationships and is communicated with all employees at induction.
- Recruitment Policy demonstrates our commitment to ensuring all our employees have the right to work in the United Kingdom and our recruitment practices include commitment to Equality, diversity and inclusion throughout the process. We use only reputable temporary labour agencies with appropriate Gangmaster Licensing through GLA. We verify the practices of any new agency.
- All suppliers are required to complete a Supplier Questionnaire which has a section on Modern Slavery.

Due diligence processes for slavery and human trafficking

The Company's assessment suggests that the risks of slavery and human trafficking taking place in our supply chains are relatively low. We are, however, not complacent. In the past we have been implementing a process of due diligence, including:

- A review and amendment of our standard terms of business and supplier qualification with the Company's supply chain and contractors, to ensure compliance with the Modern Slavery Act 2015.
- Identifying our key risk areas and bringing this to the attention of our providers through new contractual arrangements.
- Continue to manage the risks of Modern Slavery in recruitment of our permanent and agency workers, detailed in our Recruitment Policy.
- Provide our Modern Slavery Statement to customers and to internal staff through our website and internal means.

The board of directors has overall responsibility for compliance with the Act, and review progress and areas of concern bi-annually at the Compliance Review.

Combating Slavery and Human Trafficking during 2025

We also plan further measures before the end of the 2025 financial year to reinforce our due diligence processes. In particular, we will:

- Conduct a risk assessment of our supply chain taking into account; the risk profile of individual countries based on the Global Slavery Index (<https://www.globallslaveryindex.org/>), services rendered by suppliers and presence of vulnerable demographic groups.
- Evaluate ways in which we can align with other Etex businesses in the UK on policies, procedures and good practice.
- Share this statement with all our staff through internal procedures, raising awareness of modern slavery and human trafficking. We will develop an appropriate training model, to refresh awareness in 2025.
- Commit to work with any suppliers or contractors who identify modern slavery or associated risk in their organisations or supply chain to find safe solutions.
- Consider involvement of a third party auditor such as Eco Vadis to undertake ethical audits and / or align standards across of our supply chain.
- Make checks to ensure there are no signs of Modern Slavery in our organisation through quarterly checks of personal address records and payroll bank account details.

This statement was approved formally by the Company's Board of Directors, who review and update it annually.

Theresa McLean
Chief Executive Officer
July 2025