

Modern Slavery Statement 2023 – The Altro Group plc



Introduction

This statement is made by The Altro Group plc and its subsidiary Altro Limited, including all subsidiaries of both, together the Altro group of companies (“Altro group”). It is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending 31/12/2022.

Within the Altro group, we are committed to preventing slavery and human trafficking occurring in any of our corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

The topic of modern slavery continues to be an important theme for the Altro group and we continue to increase awareness both internally and within our external supply chain. We have been tracking against a number of actions through the year and will report on these within this statement. We understand that we have our part to play in the fight against human trafficking, forced labour and slavery and will continue to take action where we can and help to eliminate these practices.



Organisation Structure

The Altro Group plc is the parent company of Altro Limited and Altro APAC Pty Ltd, has over 800 employees worldwide and has its head office in Letchworth Garden City, England. Its subsidiary, Altro Limited, is the manufacturer and distributor of Altro flooring, walling and associated accessory products and Autoglym and Kanor vehicle cleaning and care products. We sell our products around the world via distribution networks and the following subsidiaries of Altro Limited: Altro Scandess SA (Spain), Altro Nordic AB (Sweden), Altro Canada Inc, Altro USA Inc, Altro Trading (Shanghai) Limited (China), Altro Japan K.K., Altro Middle East DMCC (Dubai), Altro GmbH and Altro Deutschland GmbH & Co KG. We also sell through Altro APAC Pty Ltd (Australia), a subsidiary of The Altro Group plc.

We are a privately owned business with manufacturing plants in the UK and Germany.

The Altro group are committed to transparency within our business and to promptly dealing with any issues that may arise in connection with modern

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slavery. We expect the same high standards from both our suppliers and our distributors.



Our Supply Chain

Our supply chain is diverse and ranges from suppliers of raw material for our manufacturing plants right through to finished goods and services. The majority of our raw materials and finished goods are from either UK or European sources with some coming from the USA and Asia.

The majority of the flooring is manufactured in either the UK or Germany, with the vehicle care chemicals being manufactured in the UK. Walling products, along with accessory items for both the flooring and vehicle care chemicals, are bought in goods that are generally managed by the Procurement teams.

The Procurement team use the category management model for suppliers which ensures cross functional activity is captured and all necessary functions are included in the decision making process. During 2022 the Procurement strategy has been aligned with the business strategy to enable all work to concentrate on the same key actions to support the business priorities.



Policies and Staff Training

Having reviewed and amended our staff policies and training we continued to look for ways to increase our staff awareness. The actions we have taken in 2022 are:

- The recruitment agency agreements have been reviewed and amended to ensure that the provision of temporary agency staff is compliant with modern slavery legislation. The new agreements have been circulated.

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Due Diligence

We have processes in place to assess and manage our suppliers, both new and established, from the tender process, to new supplier meetings and service level agreements.

Steps that we have taken in 2022 to improve on our processes and increase awareness are:

- We have completed supply chain mapping to tier 1 mapping for Altro Floors, Altro Resins and Altro Walls. Autoglym have started to map their supply chain to tier 1.
- We have not identified any high risk suppliers and so no audits have been carried out in 2022.
- We have started to consolidated our indirect suppliers in Altro Floors, to help reduce our exposure to harmful and illegal labour practices by having fewer approved suppliers.



Next Steps

We remain committed to supporting the Modern Slavery Act 2015 throughout 2023.

Our next steps in 2023 are:

- To complete mapping to tier 1 for Autoglym.
- To audit any suppliers that may be identified as high risk.
- To continue with an annual splashscreen update for all staff to maintain their awareness of modern slavery.
- To continue the review of indirect spend suppliers within Altro Floors to further consolidate and reduce the number of suppliers.
- To issue a Code of Conduct to our Altro Floors Customers in which the Modern Slavery Statement will be highlighted

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- To contact all of our key direct suppliers to obtain a copy of their Modern Slavery Statement to better understand how they tackle modern slavery.



Accomplishments To Date

The Altro Group have been publishing a modern slavery statement since 2017, as part of this we thought it would be good to list all of the actions we have achieved to date.

- A yearly review is completed by the Altro Group Board to make them aware of each statement before it is published.
- Increase in employee awareness through an initial presentation and annual splashscreen.
- We have updated our Whistleblowing Policy.
- We have updated our induction process to include modern slavery and human trafficking.
- We have updated our legal templates where applicable.
- The Global Slavery Index is used to identify high risk countries and associated suppliers have been questioned to better understand their supply chains.
- Where we have suppliers with on-site staff we have collated their modern slavery statements.
- A review of the new supplier process and updated form with increased data capture.
- We have sent out a supplier communication which shares our view on modern slavery and our expectations of our suppliers.
- Our Procurement Culture Questionnaire was sent out to all IT and clothing suppliers as they are seen as higher risk categories. We also shared our policies where needed to give our suppliers guidance.
- We carried out an audit of a potential new supplier based in China close to the border with North Korea as it was considered higher risk. The audit was clear.
- We have completed supply chain mapping to tier one for the Altro Floors suppliers.
- Modern Slavery is now part of the induction process for new starters.

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Closing Statement

2022 has continued to see turbulence in the supply chain, impacted by the Russia-Ukraine conflict, the resulting soaring energy costs, political instability and inflation. We remain mindful, as a business, of our responsibility to always be aware of the prospect of modern slavery within our supply chain and act accordingly to help eradicate it.

We feel we are taking the right steps on our journey regarding modern slavery. Some of the actions we recognise will take a long time to complete, for example the supply chain mapping. We hope to report year on year progress with these lengthy tasks to show that we are continuing to identify and report any instances that we do find and how we are tackling these.

As an organisation we are committed to the welfare of our staff, customers, suppliers and other stakeholders through a zero harm initiative. We feel that there is more that can be done both internally and externally to help eradicate modern slavery and the aim is to work through the various actions that we have identified, with the resource that we have. If we keep modern slavery high on our agenda we believe we can help to make a difference.



Board Approval

This Statement has been communicated to the Board of The Altro Group plc to inform directors of the work that has been done, that will be done in 2023 and the steps we plan to take as a business to guard against modern slavery and human trafficking.

This Statement was approved by the Board of Directors for The Altro Group plc on 30th March 2023.

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Richard Kahn
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Richard Kahn

Managing Director – The Altro Group plc