

Modern Slavery Statement 2021 – The Altro Group plc

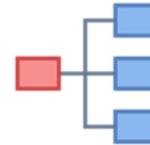


Introduction

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 31/12/2020.

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.

We are now several years into this topic 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) and debolon dessauer bodenbeläge GmbH & Co. KG (Germany). 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 slavery. We expect the same high standards from both our suppliers and our distributors.

Modern Slavery Statement 2021 – The Altro Group plc



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 central Procurement team.

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 2020 the main focus of the Procurement Team has been to maintain raw material, and bought in goods, supply to ensure that manufacturing could continue throughout the COVID-19 pandemic. This has enabled continuity of supply to our customers throughout 2020.



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 2020 are:

- Through 2020 the need for temporary labour has been minimal and so the action to review our recruitment agency agreements will be picked up during 2021 to ensure our agency are compliant with modern slavery legislation.
- Our Modern Slavery approach has been discussed with all new starters during 2020 as part of their induction.

Modern Slavery Statement 2021 – The Altro Group plc



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 2020 to improve on our processes and increase awareness are:

- We are continuing to map our supply chain. This has involved further mapping of the tier 1 suppliers ensuring continued delivery through the pandemic, and also, as a result of changes made to importing goods post Brexit.
- Due to the disruption caused by the COVID-19 pandemic, many of the action points for 2020 have been delayed and will transfer to the 2021 action points. Modern Slavery remains an important topic and we look forward to being able to move forward with more actions being progressed and completed within the next year.



Next Steps

We remain committed to supporting the Modern Slavery Act 2015 throughout 2021.

Our next steps in 2021 are:

- To continue working on our supply chain mapping at a tier one level. To complete the Altro Walls and Altro Resins mapping and add Autoglym suppliers.
- To continue 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 support our overseas subsidiaries in adopting best practice in the mapping of their supply chain in relation to modern slavery.
- To commence the review of indirect spend suppliers which will include their supply chain practices.
- To review the recruitment agency agreements on our preferred suppliers list to ensure that the provision of temporary agency staff is compliant with modern slavery legislation.

Modern Slavery Statement 2021 – The Altro Group plc



Accomplishments To Date

As we are now onto our fourth modern slavery statement we thought it would be good to list all of the actions we have achieved to date, since our statements first started in 2017.

- A presentation is given to the directors each year 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.
- Our Culture Questionnaire was updated and has been sent out to all IT and clothing suppliers who are seen to be higher risk suppliers.
- 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.

Modern Slavery Statement 2021 – The Altro Group plc



Closing Statement

2020 has undoubtedly been a challenging year for many companies in the UK and across the world. The safety and wellbeing of our staff is of paramount importance to us, whilst we made plans to ensure the continuity of the business during such unprecedented and challenging times. Even with the challenges of the COVID-19 pandemic we remained 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 think 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 2021 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 The Altro Group plc on 29th March 2021.

A handwritten signature in blue ink that reads 'Richard Kahn'.

Richard Kahn

Managing Director – The Altro Group plc