

Modern Slavery Statement 2018 – Altro Group



Introduction

This statement 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 31/12/2017.

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.

This is now our second statement in which we demonstrate how we have gained a better knowledge and understanding of modern slavery, as well as how we are increasing awareness of it within our business and supply chain. Our initial aim was to first take a look at what policies and procedures we had in place, and then at how we can increase our own awareness before engaging with our supply chain. Our starting point was to look at our policies, training, agreements and processes.



Organisation Structure

Altro Group is a leading manufacturer and distributor of flooring, wall cladding and associated accessories as well as vehicle care chemicals via the Autoglym and Kanor brands. We sell our products around the world, directly and through our distributors and subsidiaries; Altro Limited, Altro APAC Pty Ltd, Altro Scandess SA, Altro Nordic AB, Altro Canada Inc, Altro USA Inc, Altro Trading (Shanghai) Limited, Altro Middle East DMCC and debolon dessauer bodenbeläge GmbH & Co. KG.

We are a privately owned business with around 810 employees across the group, with manufacturing plants in the UK and Germany.

At Altro Group we 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.



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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.

In 2016, the Procurement team introduced the category management model for suppliers which ensures cross functional activity is captured and all necessary functions are included in the decision making process.



Policies and Staff Training

Our aim during 2017 was to review our policies and training and see where we could take action to increase awareness internally with our own staff. The actions we have taken are:

- A presentation was given to the Board members to increase the Directors knowledge of modern slavery and to keep them informed of the work that is going on and steps we plan to take as a business.
- To make our employees aware of the Modern Slavery Act 2015 and to communicate what we have been doing as a business, we prepared a short presentation that has been cascaded through team meetings and shift briefings.
 - this presentation, along with the statement, was also cascaded to our subsidiaries to make them aware of the Act and the steps we are taking
- All policies have been reviewed and amendments made to the Whistle-blowing Policy to include modern slavery and human trafficking, this update has been cascaded to all employees.

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- Our induction process has been reviewed and amended to include modern slavery and human trafficking. This ensures that all new staff are made aware of the Company's approach and how they can report any concerns that they may come across.
- After our statement was published on our websites we created a splash screen that opened on all computers upon login, to continue staff awareness on the topic of modern slavery.



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 2017 to improve on our processes and increase awareness are:

- Our legal team are in the process of updating the agreement templates and this will continue until all templates are up to date.

- Our supplier Company Culture Questionnaire has been updated to include a section on modern slavery to understand how our new suppliers will manage this topic. This document has been cascaded within the Procurement team and also downloaded onto our intranet site for staff to utilise where they have contact with new suppliers.
- The service level agreements were reviewed and it was not deemed appropriate to include modern slavery within these documents as they are concerned with actual services being carried out on site.
- We have collated some information using the Global Slavery Index to highlight countries of high risk where additional information or audits should be considered. This has been cascaded within the Procurement team as well as downloaded onto our intranet site for all staff to use.
- We contacted our suppliers who have staff onsite (cleaning, catering and security) to collect their Modern Slavery Act 2015 statements, where required.

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Next Steps

At Altro Group, we have an internal cross-functional team, with responsibilities for reviewing this statement on a regular basis and ensuring that progress is being made in the areas identified. Our next steps in 2018 include:

- To assess suppliers identified as potentially high risk using the Global Slavery Index.
- To plan audits of any suppliers identified as high risk.
- To review the tender process with an aim to include the supplier Company Culture Questionnaire within the documentation.
- To continue with an annual splashscreen update for all staff to maintain their awareness of modern slavery.
- To review the appropriate communication channels with suppliers around their position on modern slavery and increasing awareness within our supply chain.
- To work with other companies to share best practice and ideas on managing/removing modern slavery.



Closing Statement

We are at the beginning of a journey regarding modern slavery. Traditionally it is a subject that organisations have not focussed on. Year on year we intend to add more to our statement to show how we are taking further steps to eradicate any such practices from our supply chain.

We feel that we have made some positive initial steps in raising our awareness of modern slavery both internally with our own staff and also to start raising awareness within our supplier base. We realise that there is no instant fix, that as awareness grows and risks are identified and researched, we will need to react and become involved to put right any faults or instances found.

If we were to find any instances of modern slavery within our supply chain, our aim would be to offer guidance and assist in resolving the situation, not to terminate agreements and turn our backs on the problem.

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Board Approval

This Statement has been approved by the Board of Directors for the Altro Group.

A handwritten signature in black ink, appearing to read 'Richard Kahn'.

Richard Kahn

Managing Director – Altro Group