

# Modern Slavery Statement 2019 – Altro Group

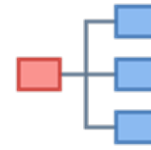


## Introduction

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 31/12/2018.

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 on our third statement and feel that we are making progress, increasing 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

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.

# Modern Slavery Statement 2019 – Altro Group



## 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

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 are:

- A communication was given to the Board members to explain the 2018 statement and to keep them informed of the work that is going on and steps we plan to take as a business.
- We created a new splash screen that opened on all computers upon login, to continue staff awareness on the topic of modern slavery. This provided statistics on modern slavery as well as a link to both our websites where our statement can be found.
- Our induction process ensures that all new staff are made aware of the Company's approach to modern slavery and how they can report any concerns that they may come across.

# Modern Slavery Statement 2019 – Altro Group



## 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 2018 to improve on our processes and increase awareness are:

- We have started to map our supply chain. This has involved listing all raw materials and bought in goods purchased under Procurement led contracts in the Floors part of the business and understanding first tier involvement. The aim is to assist our risk assessment and risk management of modern slavery.
- We have contacted two of our suppliers, who are distributors, where the origin of the product was unknown. According to the Global Slavery Index none of the second tier suppliers from these two distributors, are from high risk countries and no further action is being taken at this time as the risk is classed as minimal.
- A communication has been written which will be sent out to Altro Group suppliers. The aim of this is to increase awareness of modern slavery

within our supply chain and communicate our expectation of our suppliers.

- Our legal team have updated our existing agreement templates and any new agreements will take current policies into account.
- Our supplier Company Culture Questionnaire which now includes a section on modern slavery is being added to our invitation to tender pack. The aim is to understand more about how our suppliers are dealing with modern slavery before we use them.
- We contacted both a professional organisation that we are affiliated to and a non-governmental organisation that helps to tackle modern slavery in supply chains to see if there are any forums for SME's, like ourselves, to gather and discuss how they are tackling modern slavery and share best practice. At this time there are no known forums for SME's to openly discuss how they are tackling modern slavery and share experience.

# Modern Slavery Statement 2019 – Altro Group



## 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 2019 include:

- To continue working on our supply chain mapping, to include more products and suppliers at a tier one level. Also, to broaden the scope to include the Autoglym suppliers.
- To plan audits of any suppliers identified as high risk.
- To review the new supplier process with an aim to include appropriate modern slavery questions, to help raise awareness and identify any issues.
- To continue with an annual splashscreen update for all staff to maintain their awareness of modern slavery.
- To send out the supplier communication to continue raising awareness of modern slavery within our supply chain and sharing our expectations of them.
- Contact and review IT and clothing/uniform suppliers as these are areas that are highlighted as higher risk.

- To engage with our overseas subsidiaries to adopt best practice in the mapping of their supply chain in relation to modern slavery.



## Closing Statement

We remain close to the beginning of 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 at the top of our agenda we think we can help to make a difference.

# Modern Slavery Statement 2019 – Altro Group



## Board Approval

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

Richard Kahn

Managing Director – Altro Group