POLYPIPE GROUP PLC

MODERN SLAVERY STATEMENT
2021

• Our Organisation
• Suppliers
• Agency Workers
• Employees
Our Organisation

Polypipe is one of Europe’s largest and most innovative manufacturers of plastic piping and energy efficient ventilation systems for the Residential, Commercial, Civils and Infrastructure sectors. We operate across Europe and the Middle East, from 19 locations. Manufacturing over 90% of our own products and managing much of our own distribution, we view our overall risks to be low, however, we are not complacent and have a zero tolerance policy towards any modern slavery or human trafficking rights violations.

Everyone at Polypipe strives to create better outcomes for all our stakeholders by living our values and bringing these values to life through our day-to-day behaviours. We aspire to put our purpose at the centre of everything we do.

Polypipe Group plc and its subsidiaries are committed to conducting business ethically and responsibly and fully support the aims of the Act and associated standards. We are focused in our commitment to developing and improving our processes continually throughout our organisation, to actively prevent the use of slavery or human trafficking either in our own companies or across our supply chain. We remain committed to tackling slavery and human trafficking and continue to monitor what we believe are key areas of our operation that could potentially be affected, which includes our suppliers and their supply chain process, agency workers and employees. Whilst the COVID pandemic has changed some of the ways we have approached our activities in 2020, we have remained focused throughout in applying and maintaining our compliance with the Modern Slavery Act.

“This statement, relating to the financial year ended 31 December 2020, is made pursuant to section 54(1) of the Modern Slavery Act 2015 and outlines the steps we have taken as an organisation to assess our operations and supply chain to mitigate any risk of slavery and human trafficking.”

3,139 Polypipe Employees
3,300 Suppliers
19 Facilities in the UK, Continental Europe and the Middle East
Suppliers

- We engaged directly with both our current and new suppliers in respect of our anti-slavery policy in order to gain a proper understanding of the measures they have in place within their own business and supply chain, inclusive of full and detailed site audits, where appropriate.

- Specifically during 2020, given the additional factors of COVID shaping a new approach to our systems and processes, Polypipe tasked our Head of Procurement with reviewing all procurement policies and procedures and to undertake a full audit into our safe working practices within our supply chains. In conjunction with these activities a number of audits across our supply chains both in the UK and the globe were risk assessed prior to COVID hitting our shores and although we have experienced a year where the majority of site visits have not been possible, additional audit checks of documentation, systems and processes have been evident.

- Due to the outbreak and subsequent lockdowns in 2020 it has proven difficult to carry out site audits as we normally would therefore as a consequence of the outbreak we also reduced the number of new suppliers into the business and continued to trade with our long standing trusted suppliers to minimise any risk. Virtual meetings have been conducted with many suppliers and will carry on this way until it is safe to continue physical site audits.

- We remain encouraged by the results of our audits and how our suppliers and their people have adapted to manage our supplies in such a turbulent year. We will continue to undertake such duties and activities throughout 2021 to effectively monitor and assess our supply chains whilst recognising that collaborative working remains vital to effectively mitigate issues and implement positive change where needed.

- Our contractual documentation continues to incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour and child labour in line with our policy and we stipulate that our contracted suppliers must hold their own suppliers to the same standards. We widely issue both our statement of intent and policy prior to new contracts being established to make our expectations perfectly clear.

- We reserve the right to terminate any contractual arrangement if there is a breach of our anti-slavery policy.

- We expect all suppliers to familiarise themselves with our policy and to act with due diligence and integrity at all times in a way that is consistent with its values.
Agency Workers

- We only engage with agency workers sourced through reputable and local agency providers and follow the same checks as we do with our suppliers before contracting with an agency provider.

- Where appropriate, we will engage directly with our agency providers in respect of our anti-slavery policy in order to gain a proper understanding of the measures they have in place within their own businesses and undertake detailed site audits relating to their payment practices, conditions and legal compliance processes.

- We require that all agency providers evidence a worker’s right to work within the country in which our businesses reside.

Employees

- We recruit employees fairly and lawfully, verifying that all employees have the right to work in the country in which our businesses reside upon commencement of employment.

- All employees are given a contract of employment before commencement and an Employee Handbook in line with appropriate legislative requirements.

- All employees are paid in accordance with their roles and above minimum statutory pay provisions, which is again monitored through our internal audit practices.

- We also take the appropriate steps to ensure everyone who works for Polypipe works in an environment in which their fundamental human rights are respected.

- We continually seek feedback from our employees through our annual surveys to identify any behaviours or practices that could lead to potential failures in our expected standards. Our confidential feedback approach allows for any potential issues to be raised. During 2020 our surveys revealed the overall level of engagement of our staff increased by a further 6% compared to our 2019 data.

- Our Whistleblowing policy and procedure enables any employee the right to raise any concerns without the risk or fear of reprisal and we encourage and empower our employees to feel confident in speaking out about any concerns which they may have.
Polypipe complies with the employment laws of every country in which we operate in and expects those that we do business with to do the same. A trade sanctions policy is in place which advises our people of steps to take with countries which carry a trading risk and we continue to take steps to provide our procurement and HR personnel with appropriate training in understanding the ever changing global structure and sanctions.

We continually endeavour to ensure our employees are armed with a complete understanding of the broader issues of modern slavery to assist them in appreciating the extent of the problem within the UK and across the globe, and to identify areas of the business that may be at risk from inappropriate practices.

Mandatory refresher training is undertaken on an annual basis for employees employed in specific functions and additional learning and understanding regarding the implications and complexities of the UK leaving the EU, regarding both border and trade sanction changes, has also been at the forefront of our learning activities during 2020.

In summary our business remains focused and committed to stamping out any risk of Modern Slavery.

This statement is made pursuant to section 54(1) of the Act. The Board approved this statement on behalf of the Polypipe plc Board on:

Thursday, 4th February 2021

Martin Payne
Chief Executive Officer

Signed for on behalf of Polypipe Group plc.