

## **Aluplast Modern Slavery & Human Trafficking Statement – Financial Year 2022**

Our company Aluplast is a large privately owned company incorporated in Germany. Aluplast Poland was established in 1993 and is proud to be the one of the largest manufacturers of quality window and door systems for the construction industry. We run many automated production lines operating 24/7 and we have two production plants based in Poznań and Nragadowice. The superior quality of our products has been recognised all over the world and we currently export to 16 countries. Our manufacturing operations are done mainly from our headquarters in Poland and we also distribute product from the UK.

Aluplast opposes slavery in all its forms (including child labour) and has zero tolerance to slavery and human trafficking. This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps that Aluplast has taken to ensure that slavery and human trafficking is not taking place in its supply chain or in any part of its business. Aluplast is committed to ensure that human rights are respected, and all suppliers must adhere to a strict ethical code of conduct.

We welcome the UK's modern slavery reporting initiative, which we believe will play an important role in risk reduction. This is our first statement regarding this issue, and we are committed to a continuous improvement approach to ensure that we are not directly or indirectly acquiescing in unacceptable labour practices. Assessing and addressing the risks of modern slavery is one aspect of the Aluplast Group's holistic approach to operating a sustainable business that benefits our stakeholders and the broader community.

The following steps are taken by our company to eliminate or at least minimise the risk of using slavery work (including child labour) and human trafficking in our business actions:

### **Suppliers**

We work closely with our head office site in Karlsruhe Germany and subsequently we engage reputable suppliers and partners, with whom we have long-term relationships and share the same values of sincerity, determination, passion, diversity, accountability, and integrity – all of which are important when it comes to choosing the best suppliers and partners to work with throughout our supply chain. We ensure that third parties after a risk assessment are asked to complete our compliance questionnaire. In addition, we have an ongoing oversight and review of key suppliers. We ensure that contracts are in compliance with relevant laws and regulations. We look to ensure that our suppliers complete our procurement questionnaire that seeks a commitment to uphold our requirements around protecting the environment and social behaviours in our supply chain. Commitments on opposing modern slavery are also required.

### **Supply chain overview and Due Diligence process**

Aluplast is committed to have a transparent approach to ensure that its businesses and supply chains adhere and comply with the prevention of any aspect of slavery, as set out in The Modern Slavery Act 2015. The company already has control processes in place to ensure its businesses comply with statutory regulations, including, where relevant (but not limited to):

- risk assessments;
- engagement with trusted suppliers;
- contractual provisions;
- factory tours and visits.

We also carry out supplier pre-screening where appropriate. If our due diligence process reveals any issues, we are committed to taking appropriate action including but not limited to:

- working with appropriate organisations to improve standards;
- removing that organisation from our preferred supplier list;
- passing details to appropriate law enforcement bodies.

### **Employment**

Aluplast takes proactive measures as a responsible employer to protect workers and prevent exploitation. Our people in UK are employed directly, which lowers the risk of modern slavery practices occurring within our team. Our assessment of these risks is accordingly more focused on our upstream suppliers. All staff, workers or other parties are strongly encouraged to report any concerns or suspicions they might have to the HR Team.

We closely monitor third party labour, temporary migrant workers, younger people, students and/or other workers, potentially working on a casual or seasonal basis, which can give rise to the risks of deceptive recruitment, forced labour and debt bondage. The risks in this area are greater, due to lower levels of literacy, education, experience, and knowledge of rights among such workers, as well as higher levels of reliance on the employer. We have identified that, within our upstream suppliers, these are the risks that are most salient to our business.

Employment agencies – are audited to ensure they are licensed and comply with the local regulations.

### **Training**

We conduct training for our buying team so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. The company also provides appropriate training and awareness information to all staff including the leadership team who receive detailed training to help them spot the signs of exploitation in victims and how to resolve any concerns relating to modern slavery and human trafficking.

This statement was approved by the Board of Directors 28. February 2023.

**Christian Voicu**

*Chairman of the Board*