

Modern Slavery Statement 2024 – The Altro Group plc



Introduction

This statement is made by The Altro Group plc and its subsidiary Altro Limited, including all subsidiaries of both. 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 31/12/2023.

Within the business, 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.

The topic of modern slavery continues to be an important theme for us 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 863 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 Spain Floors and Walls SAU, Altro Nordic AB (Sweden), Altro Canada Inc, Altro USA Inc, Altro Trading (Shanghai) Limited (China), Altro Japan K.K., Altro Middle East DMCC (Dubai), Altro GmbH and Altro Deutschland GmbH & Co KG. 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.

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 Procurement teams.

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 2023 the Procurement strategy has been aligned with the business strategy to enable all work to concentrate on the same key actions to support the business priorities.



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 2023 are:

- The system of an annual staff update has moved from a login splashscreen to a staff wide email detailing some modern slavery facts and figures along with links to our Modern Slavery Statement to maintain staff awareness.

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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 2023 to improve on our processes and increase awareness are:

- We have not identified any high risk suppliers and so no audits have been carried out in 2023.
- We have concluded our review of our indirect suppliers in Altro Floors, to reduce our exposure to harmful and illegal labour practices.
- The Supplier Code of Conduct has been written and as in the process of being approved by internal stakeholders.



Next Steps

We remain committed to supporting the Modern Slavery Act 2015 throughout 2024.

Our next steps in 2024 are:

- To work on supply chain mapping to tier 1 for Autoglym.
- To audit any suppliers that may be identified as high risk.
- To continue with an annual update for all staff to maintain their awareness of modern slavery.
- To communicate the approved Supplier Code of Conduct to our Altro Group suppliers in which the requirements for Modern Slavery compliance will be referenced.
- To review indirect spend suppliers within Altro Walls and Altro Resins to further consolidate and reduce the number of suppliers.
- To set up a 3rd party Whistleblowing facility.

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Accomplishments To Date

We have been publishing a modern slavery statement since 2017, as part of this we thought it would be good to list all of the actions we have achieved to date.

- A yearly review is completed by The Altro Group plc Board to make them aware of each statement before it is published.
 - Increase in employee awareness through an initial presentation and annual awareness activity.
 - We have updated our Whistleblowing Policy.
 - We have updated our legal templates where applicable.
 - 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.
 - We have completed supply chain mapping to tier one for the Altro Floors suppliers.
 - Modern Slavery continues to be part of the induction process for new starters.
 - We have completed supply chain mapping to tier 1 mapping for Altro Resins and Altro Walls.
 - We have reduced the reliance on Far East manufacturing in Autoglym by moving products to European suppliers.
 - The recruitment agency agreements have been reviewed and amended to ensure that the provision of temporary agency staff is compliant with modern slavery legislation. The new agreements have been circulated.

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Closing Statement

2023 has been a busy year for The Altro Group plc with continued global geopolitical tensions, inflation, and global supply chain issues. We continue to engage with our staff and supply chain to maintain awareness of modern slavery and to understand how we can continue to take steps to help eradicate it.

We have been publishing annual Modern Slavery statements since 2017 and feel that the many steps that we have already taken, and will continue to take, show how committed we are to tackling modern slavery within our sphere of influence. We realise that there is always more that we can do and that certain tasks we have already undertaken can be re-visited as we progress through this journey.

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 believe 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 2024 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 Altro Group plc on 25th April 2024.

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Richard Kahn
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26 April 2024 | 2:14:41 AM PDT

Richard Kahn

Chairman and Managing Director – Altro Group