



IKO PLC : 2019 Statement of Compliance

Modern Slavery and the Supply Chain

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by IKO Plc during the financial year ending 31st December 2018 to prevent modern slavery and human trafficking in its business and supply chains.

IKO Plc

IKO Plc has a family tree spanning over a hundred years in the production of innovative solutions for flat roofs, pitched roofs and the waterproofing industry. Specifier's, installers and building owners alike rely on IKO's proven technical expertise for new build and refurbishment projects, throughout all industry sectors. IKO's continued investment in UK manufacture ensures that we can provide roofing and waterproofing solutions that meet increasingly stringent performance and design requirements. The fact that our customer base ranges across Specifiers and Installers, Merchants, Distribution and Retail means we enjoy a relatively stable demand with limited seasonality and as such our labour force at each of our manufacturing sites are predominately full time employed.

Structure

This statement represents the views and practice of IKO PLC and covers the following UK Manufacturing Operations;

IKO Plc
Appley Lane North,
Appley Bridge,
Wigan, WN69AB

IKO PLC,
Prospect Quarry,
Grangemill,
Matlock, DE4 4BW

IKO Polymeric,
Coney Green Road,
Clay Cross,
Chesterfield, S45 9HZ

Overarching Statement

Slavery and human trafficking are abuses of a person's freedoms and rights. We are totally opposed to such abuse in our direct operations, indirect operations and supply chain and can confirm no labour is provided to the Organisation in the pursuance of the provision of its own services by means of slavery or human trafficking.



Employees within IKO Plc are free and entitled to be a member of and be represented by a Trade Union, currently there are two represented, Unite and GMB.

Meaning of Slavery and Human Trafficking

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015 and is guided by the UN Universal Declaration of Human Rights and the conventions of the International Labour Organisation, particularly relating to forced or compulsory labour.

We recognise that Modern Slavery is a complex issue and understand that the term is used to denote human trafficking, forced labour and slavery-like practices such as debt bondage, and the sale or exploitation of children.

- Human Trafficking is the act of recruiting, transporting, transferring, harbouring or receiving a person, through any coercive means for the purpose of exploitation.
- Forced Labour is work or service that is taken from a person under the menace of a penalty and for which the person has not offered themselves voluntarily.
- Debt Bondage is a worker pledging their labour or the labour of others under their control as security for a debt, when either the real value of the work undertaken is never applied to repayment of the debt, or the length and nature of the work that has to be undertaken is never fully defined or limited.
- Sale and Exploitation of children involves situations where children are transferred by one person to another for remuneration or other consideration.

Supply Chain

Our supply chain is accredited to BES 6001 for responsible sourcing of raw materials and finished products principally related to the manufacture and sale of Roofing and Waterproofing products.

Our supply chain 1st Tier suppliers for all products, both 'raw materials' and 'bought in goods' are all UK or EU based.

In general IKO Plc considers its exposure to slavery and human trafficking to be low, though analysis has identified two suppliers with tier 2 risks that we regard as being medium/high on the basis that materials are sourced from India and China. Both these suppliers on an annual basis have to demonstrate that their supply chains meet our criteria of adherence to the Modern Slavery Act.

Risk Assessment and Due Diligence

As part of our initiative to identify and mitigate risk;

- On an annual basis we map and create a risk profile for our top 100 suppliers rated by annual spend, by reviewing their location, industry sector and potential labour cycle practices using data and findings from internationally recognised organisations. Any suppliers either Tier 1 or that we believe may have Tier 2 Med/High risk elements within their supply chain will be asked to provide evidence that they are able to comply with the requirements of the Modern Slavery Act 2015.

- All suppliers are required to complete an annual supplier Self- Assessment Questionnaire which includes sections on Quality, Environment and Modern Slavery. They are required to confirm that they fully understand and comply with the requirements of the Modern Slavery Act 2015 within their own operations and that they have taken steps to ensure their own supply chains are free of risk and can supply evidence to support their statement. This was updated for 2018 to include notification that failure to supply the required data or confirm their adherence to the requirements of the Modern Slavery Act 2015 will prompt their removal from active supplier status.
- With regard to National and International Supply Chains, our point of contact is with a UK or EU Company or Branch who we expect to be able to demonstrate that they have suitable anti-slavery and human trafficking policies and processes in place.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.
- The company will not support or deal with any business knowingly involved in slavery or human trafficking.

IKO Plc Policies – Related to Modern Slavery Ethics;

- Staff Handbook – issued to all employees.
- Maternity Rights Policy.
- Paternity Rights Policy.
- Anti-Bribery Policy.
- Dignity at Work.
- Discipline Policy.
- Grievance Policy.
- Ethical Policy.
- Flexible Working Policy.
- Whistleblowing Policy
- Recruitment and Selection Policy.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business we provide training to relevant members of staff and Directors. This training is documented and refreshed on a biennial basis.

The Company Directors approve along with Senior Management to take responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and its supply chain.

A full copy of this statement and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and a copy can be obtained from the HR Department upon request.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Companies human trafficking statement for the current financial year.

Approved By IKO PLC Managing Director

Signature:

A handwritten signature in black ink, appearing to read 'A Carlyle', written in a cursive style.

Print Name: Anthony Carlyle

Date : 25th March 2019