

Modern Slavery Act 2015 Policy Statement – Financial Year ending 31st December 2021

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Knauf Insulation Limited has taken and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Slavery is an umbrella term for activities where one person obtains or holds another in compelled service. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Knauf Insulation Limited has a zero tolerance approach to any form of modern slavery. Modern slavery occurs throughout the UK, but due to the secret nature, many people are unaware of what it looks like, or what action can be taken should they encounter it.

We are committed to acting ethically, with integrity and transparency in all business dealings and to putting effective systems and controls in place, to safeguard against any form of modern slavery taking place within the business, or our supply chain.

Our Business

Part of the Knauf group (<http://www.knauf.com>), a family-owned multi-national manufacturer with 40 years of experience in the insulation industry, we are leading the change in smarter insulation solutions for a better world.

We are one of the fastest growing and most respected names in insulation worldwide and are committed to helping our customers meet the increasing demand for energy efficiency and sustainability in buildings.

In the UK we have 3 manufacturing plants in St Helens, Cwmbran and Queensferry with our UK Head Office in St Helens.

Our Mission

Our mission is to challenge conventional thinking and create innovative insulation solutions that shape the way we live and build in the future, with care for the people who make them, the people who use them and the world we all depend on.

CHALLENGE

We challenge ourselves, regulators and our industry to develop new concepts and new ways of thinking about insulation and buildings;

CREATE

We create innovative solutions that change the way we work and set new standards of quality, performance and sustainability;

CARE

We care about what really matters: our people, our customers, our communities and ultimately, our planet.

Our Vision

We lead the change in smarter insulation solutions for a better world. Our aspiration is to be the world's most trusted insulation partner providing high performing and smart insulation solutions and services for a better world.

Knauf Insulation Ltd

PO Box 10, Stafford Road, St.Helens, Merseyside, WA10 3NS. UK

T: 01744 766600

F: 01744 612007

www.knaufinsulation.co.uk

Registered Office: Stafford Road, St.Helens, Merseyside, WA10 3NS. UK Registered In England, Company Number: 1926842



For further information please visit our website <http://www.knaufinsulation.co.uk/>

Our Internal Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Recruitment Policy

We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Reporting a Breach of Company Rules or Policies – including Whistleblowing policy

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains. If an employee suspects any employee, regardless of their seniority, or the Company of committing a serious breach of this policy, they have a duty to report their concerns to a director and should do so without delay. The information will be treated in confidence.

Our Employee Handbook and Knauf Group Code of Conduct ([Code of Conduct](#))

These explain the manner in which we behave as an organisation, the rules we all follow, the policies we have in place and how we expect our employees and businesses to act.

External Policies and Suppliers

Knauf Insulation will never knowingly tolerate slavery or forced labour. During 2021 we have not been made aware of any allegations of modern slavery activities against any of our suppliers, but if we were, then we would act immediately and where appropriate work with our supplier and any necessary authorities to rectify the situation.

We continue to have a complex supply chain providing services and goods to our UK manufacturing sites; the majority of our suppliers are based in the UK, but some operate from other parts of the world including mainland Europe and USA.

We continue to maintain and develop tools and processes to identify and mitigate any risk of instances of slavery or human trafficking occurring in our supply chain, some of these are outlined below.

Supplier Code of Conduct

Available [here](#), a code for existing and prospective suppliers that, amongst other requirements, sets out expected standards of working conditions for staff employed by the supplier – including free choice of employment, no child labour, remuneration and benefits, hours of work and non-discrimination.

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Preferred supplier list

We follow a defined on-boarding process for any new suppliers and due diligence is carried out on suppliers before and after allowing them to become a preferred Knauf Insulation supplier. This due diligence can include desk or field-based audits including self-disclosure questionnaires and collation of any accreditations and standards held.

Trading arrangements

In our latest standard Terms of Purchase and Supply Agreement (available [here](#)), the company reserves the right to terminate a supplier contract at any time should any instances of modern slavery come to light.

As part of Knauf Insulation's trading arrangements, new and existing suppliers are required to demonstrate that:

- They confirm compliance with the Knauf Insulation Code of Conduct for Suppliers
- They have taken steps to eradicate any modern slavery within their business
- They shall notify Knauf Insulation promptly if they become aware, or has reason to believe, that their organisation or any of its agents or subcontractors have breached or potentially breached the Modern Slavery Act 2015
- They hold their own suppliers to account over modern slavery
- They pay their employees at least the regional minimum wage / national living wage (as appropriate).

Relevant memberships and Accreditations

Knauf Insulation is a voluntary member of SEDEX (Supplier Ethical Data Exchange), an affiliate member of TISC (Transparency In Supply Chains) Report and a member of the Supply Chain Sustainability School.

All our production facilities are certified for four of the most important International Management Standards: ISO 9001 (Quality Management), ISO 14001 (Environmental Management), ISO 50001 (Energy Management), OHSAS 18001 (Occupational Health & Safety Management).

BES6001 accreditation and Responsible Sourcing Policy

Knauf Insulation hold BES6001 Accreditation (see [here](#)) across both our Glass and Wood Wool businesses which was supported by and helped the development of our Responsible Sourcing Policy (available [here](#)).

Training on Modern Slavery and Human Trafficking during 2021

We have a dedicated member of the procurement team to keep up to date with legislation and manage the communication of key policies in relation to modern slavery.

Despite the progress in the knowledge gained through 2021, we strive to improve the awareness of the wider business on this topic.

Future plans for combating Slavery and Human Trafficking during 2022

We will continue to develop and inform anti-slavery initiatives into our business, existing supply chain and new suppliers during 2022. Initiatives will include:

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- Raising awareness amongst all teams in the business of the different types of modern slavery and what signs to look out for.
- Promotion of the UK modern slavery and exploitation helpline, in the instance that an individual should need to report an issue. They will know the where to access the correct information.
- Update of the employee handbook to include a specific section on Modern Slavery.
- We will continue to use the internal platforms via Microsoft 365, e.g., Yammer and Teams to communicate information as above, as well as utilising on site notice boards.
- Video content will continue to be the prime source of communication to the business; this content will be appropriately sourced from the relevant organisations, to ensure consistent and up-to-date information is shared.
- Explore how Knauf can contribute to fundraising and seek out training opportunities.
- Externally, we will further develop any other relevant tools we feel are appropriate to communicate with and monitor our suppliers.
- To carry out an assessment of our largest suppliers (covering 80% of the spend) to ensure we have a current copy of their modern slavery statement and codes of conduct.
- Put into place some Key Performance Indicators to help monitor and measure how we are performing in some key areas of this statement.
- Continue to review our options for undertaking ethical audits of our supply chain, which may include desk-based audits or third party assessments and make use of the tools available from places such as TISC, SEDEX, Global Slavery Index and the Supply Chain Sustainability School.
- Making use of resources and tools available from relevant third parties such as those listed above. Plus seeking new partners to move us forward in our understanding and develop modern slavery processes within Knauf.
- This statement and any relevant policies will be reviewed regularly and at a minimum frequency of once per year by end of June.



Neil Hargreaves – Managing Director

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