

Anti-Slavery Statement for Bewi (UK) Ltd

This statement is made on behalf of Bewi (UK) Limited pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act'), and constitutes our anti-slavery and human trafficking statement for the financial year ending 2024.

Our business and structure

An overview of our organisational structure, key business activities and supply chains is as follows:

We manufacture expanded polystyrene products for the construction, civil engineering, horticulture, fresh produce (fish and processed foods) and the packaging and automotive industries.

We supply finished products via distributors and direct to end users from three manufacturing sites across the UK. We only supply products to the UK.

Whilst our end users may transfer our products outside the UK, this is a very rare occurrence due to the high cost of transportation and easy availability of similar products in other countries. In any event our customers have their own fiduciary duties regarding the UK legislation on modern slavery as well as any responsibilities they may have in relation to the laws of countries they are exporting to.

Define Modern Slavery

The term “modern slavery” encompasses the offences of slavery, servitude and forced or compulsory labour, and human trafficking. A common misconception about modern slavery revolves around the idea that victims are primarily non UK nationals. Gov.uk reported that the most common nationality of potential victims in 2020 was UK nationals, accounting for 34% (3,560) of all referrals. The most common forms of exploitation reported were labour exploitation for adults and criminal exploitation for minors.

Despite the challenges in identifying modern slavery, there are generic indicators. While this is not exhaustive nor conclusive, these can help to identify potential victims. Victims may appear anxious or fearful and may isolate themselves from others. They could be threatened with violence, potentially having injuries that they are unable to explain to others. They may have very few possessions, including a lack of identification. Further, they may not be allowed to travel on their own or appear to be in a controlling relationship.

Policies on Anti-Slavery and Human Trafficking

We maintain a clear and comprehensive Modern Slavery Policy which is annually reviewed, updated, and approved by the senior management team.

Our Policy states that modern slavery is a crime and a violation of fundamental human rights to which both BEWI UK Construction, and Packaging have a zero-tolerance approach, as perpetuated within this policy and is the responsibility of every individual part of our business.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This legislation is a crucially important development in tackling slavery and human trafficking, and we will not trade or partner with any business or organisation which is involved in this shocking practice however remotely or indirectly.

We consider that we have an obligation to demonstrate and promote fair and reasonable standards in the treatment of people who are operating within their sphere of influence. This applies to any situations whether regarding employment, the operation of our business or sourcing our suppliers or other organisations with whom we may work.

Our supply chains.

Our supply chains include:

The main raw material used in our process is Styrene which we responsibly source from companies manufacturing worldwide, but particularly in EU countries.

The suppliers of our raw material supply for example, come from the Netherlands, Germany, France, Austria, Italy, Mexico, China and Turkey.

The raw material used to produce Styrene is Styrene Monomer. This is a by-product of the oil extraction and oil refining/petrochemical industries and is noted as a risk of modern slavery due to the countries in which it operates.

Due to demand and availability from time to time they may source Styrene Monomer from outside their organisation. Under either their own ISO 14001 certification or their own nationally recognised environmental management system, they must only purchase from other ISO 14001, or equivalent approved manufacturers.

The Petrochemical industry are required to report every year on the steps they are taking to ensure that slavery and human trafficking is not taking place in any part of its own business. If they are taking no steps this must also be reported.

We have reviewed the risks that these supply chains can present.

We require our suppliers and contractors to demonstrate a zero-tolerance approach to exploitation. To this end we have inserted a clause into our contracts with any organisation in our supply chain requiring that they comply with the provisions of the Act and granting us the right to terminate in the event of their failure to do so.

Measures being taken

As part of our initiative to identify and mitigate risks, we will work closely with our employees, customers and main suppliers as well as with bodies such as BSI, in order to ensure compliance with ethical trading initiatives.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Made staff aware of the Modern Slavery Act and informed them of what to do if they suspect there is a case of this
- Protect whistle blowers.

All of our suppliers are managed and maintained through our BEWI group supplier sustainability platform for total transparency, and through this procurement process, we will only engage with suppliers and contractors who confirm their compliance with the Act. We will continue to keep our staff informed and raise awareness of how to recognise and respond to indicators of human rights abuses. We have adapted and re-promoted our existing corporate policies to incorporate modern slavery and human trafficking issues, including our whistleblowing policy which allows employees to report any concerns confidentially.

We will continue to review our policies and procedures to ensure that anti-slavery is at the forefront of our operations.

A handwritten signature in black ink, appearing to read 'John Cooper', with a stylized, cursive script.

Name: John Cooper

Position in company: Finance Director