

Modern Slavery Statement 2025 – Altro Group Limited

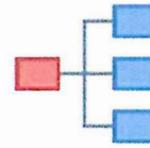


Introduction

This statement is made by Altro Group Limited 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 31/12/2024.

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.

Modern Slavery is a continuously reviewed topic within Altro where the internal working group meets quarterly to check on progress of the current actions and to discuss new actions to be included for the following year. Sometimes, during the course of the year, projects are updated and actions replaced with more up to date ones aligned with business strategy as priorities change.



Organisation Structure

Altro Group Limited is the parent company of Altro Limited and Altro APAC Pty Ltd, has over 865 employees worldwide and has its head office in Letchworth Garden City, England. Its key subsidiaries, are

- Altro Limited, manufacturer and distributor of Altro flooring, walling and associated accessory products and
- Autoglym and Kanor vehicle cleaning and care products.

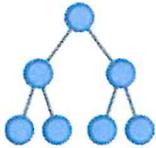
Our products are sold around the world via distribution networks and the following subsidiaries of Altro Limited: Altro Spain Floors and Walls SAU, Altro Nordic AB (Sweden), Altro Canada Inc, Altro USA Inc, Altro Trading (Shanghai) Limited (China), Altro Japan K.K., Altro Middle East DMCC (Dubai), Altro GmbH, Altro Deutschland GmbH & Co KG, Portbid Pty. Limited and GNG Sales New Zealand Pty Limited. We also sell through Altro APAC Pty Ltd (Australia), a subsidiary of Altro Group Limited.

We are a privately owned business with manufacturing plants in the UK and Germany.

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We are committed to transparency within our business and to promptly deal with any issues that may arise in connection with modern slavery. We expect the same high standards from both our suppliers and our distributors.



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. Most of our raw materials and finished goods originate from either UK or European sources with the remainder coming from the USA and Asia.

The majority of the flooring products are 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. 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 2024 are:

- A UK staff wide email detailing facts and figures on modern slavery, how to detect it and who to contact if it is suspected was issued to maintain staff awareness.
- Our Altro Floors Procurement staff have undertaken several Ecovadis online courses to provide them with a better understanding of modern slavery and related topics including Identifying and Remediating Modern Slavery, Identifying and Remediating Child Labour, Identifying and Remediating Human Trafficking, Sustainable Procurement Reporting, Supplier Code of Conduct & Contract Clauses, Conflict Minerals, Responsible Sourcing of Wood and Palm Oil, and Sustainable Procurement Policy

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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 2024 to improve on our processes and increase awareness are:

- We have started to use a supply source based in Peru, and through our UK distributor we have requested and received the necessary documentation to show that the correct checks have taken place.
- The Supplier Code of Conduct has been communicated out to all of the main Altro Floors, Altro Resins and Altro Walls suppliers. This will either be signed and returned by the supplier or they will return a copy of their own Supplier Code of Conduct.
- We have collated the data necessary for Altro Walls and Altro Resins to enable the review of indirect spend. Along with introducing a higher level of governance internally to provide a better visibility of this spend.
- A 3rd party Whistleblowing facility is being reviewed with the aim of implementing it group wide in Q1 2025



Next Steps

We remain committed to supporting the Modern Slavery Act 2015 throughout 2025.

Our next steps in 2025 are:

- To audit any suppliers that are identified as high risk.
- To continue with an annual update for all UK staff to maintain their awareness of modern slavery.
- To further staff awareness via posters containing how to identify and how to report instances of modern slavery which will be put up around all UK Group sites
- Further Ecovadis training will be identified and undertaken by Altro Floors Procurement
- A supplier risk analysis will be carried out to include modern slavery and further information sought where needed
- To map and risk profile all tier 1 suppliers at Autoglym

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- To create and communicate a Supplier Code of Conduct for Autoglym suppliers
- To make recommendations to the Boards and if approved, to implement a 3rd party Whistleblowing facility following the review



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 Altro Group Limited Board to make them aware of each statement before it is published.
- Increase in employee awareness through an initial presentation and annual awareness activity.
- Updated our Whistleblowing Policy.
- Updated our legal templates where applicable.
- The Global Slavery Index was 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.
- 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.
- 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.
- Completed supply chain mapping to tier one for the Altro Floors, Walls and Resin suppliers.
- Modern Slavery continues to be part of the induction process for new starters.
- Reduced our reliance on Far East manufacturing in Autoglym by moving products to European suppliers.
- We have concluded our review of our indirect suppliers in Altro Floors, to reduce our exposure to harmful and illegal labour practices.

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- 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.
- 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.

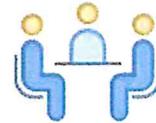
As an organisation we are committed to the welfare of our staff, customers, suppliers and other stakeholders through a zero harm initiative. We feel that there is more that can be done both internally and externally to help eradicate modern slavery and the aim is to work through the various actions that 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.



Closing Statement

At Altro Group Limited 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, shows our commitment 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.



Board Approval

This Statement has been communicated to the Board of Altro Group Limited to inform directors of the work that has been done, that will be done in 2025 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 Altro Group Limited on 6th March 2025.

A handwritten signature in black ink, appearing to read 'Richard Kahn'.

Richard Kahn
Chairman and Managing Director – Altro Group