



## MODERN SLAVERY STATEMENT OF SIG plc

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and, constitutes the slavery and human trafficking statement ("Modern Slavery Statement") of SIG plc and its relevant Group subsidiaries in respect of the financial year ended 31 December 2023. SIG plc (the "Company") and its subsidiary companies are referred to as the "SIG Group" or "Group" throughout this statement.

## INTRODUCTION

The Modern Slavery Act 2015 ("the Act") prohibits slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). The SIG Group has a zero-tolerance approach to any form of Modern Slavery and is committed to combatting all forms of Modern Slavery that could in any way be associated with its business and supply chain. This statement outlines the steps taken by SIG in the financial year ended 31 December 2023 to ensure that no Modern Slavery offences are or were taking place within any part of the SIG Group's business or its supply chains.

This statement is made on behalf of SIG plc and its subsidiary companies, each of which supply goods and services in the UK and have a combined annual turnover greater than £36m. The Group's key subsidiaries, with a turnover of £36 million or more in 2023 are listed in the footer at the bottom of this page.<sup>1</sup>

SIG plc is the parent company of the SIG Group ("SIG"). In this document 'our' and 'we' and 'Group' refers to SIG plc.

## ORGANISATIONAL STRUCTURE AND SUPPLY CHAIN

The SIG Group maintains a strong position in its core markets as a leading specialist distributor of insulation and interior products, and a merchant of roofing and exterior products, to trade customers across Europe. Although the majority of the products SIG distributes are manufactured by other companies, SIG also fabricates bespoke products "in-house". SIG's largest markets are the UK, France and Germany, which together account for around 85% of sales, and also operates in Ireland, Poland and Benelux.

This obligation, as well as all company Policies, applies to every employee across the Group as well as contractors, agents, consultants or any others working for, or on behalf of, SIG plc. All of which should ensure that they are aware of and familiar with any local legal or regulatory requirements, which may take precedence. This obligation and all other policies referred to in this statement also apply to the Group's businesses outside the UK, to the extent practicable and, providing they do not conflict with local legislation. If based in another country, then the laws of that country will also apply.

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<sup>1</sup> 1. For 2023, this includes all relevant, active UK subsidiary companies according to the requirements of the Modern Slavery Act 2015: SIG Trading Limited; Building Solutions (National) Limited; Penlaw & Company Limited; Penlaw Fixings Limited; Penlaw Norfolk Limited; Penlaw Northwest Limited; Miers Construction Products Limited; MCP Fixings Limited; Kestral Construction Products Limited



In 2023 the SIG Group had an annual total turnover of £2.76bn. Further information on SIG's structure can be found [here](#). SIG's product range and list of suppliers is extensive. More information can be found on SIG's products [here](#) and many of its key UK based suppliers [here](#).

## **POLICIES IN RELATION TO MODERN SLAVERY & HUMAN TRAFFICKING**

SIG is committed to acting ethically and with integrity in all its business dealings and relationships and continues to take appropriate and proportionate steps to ensure that Modern Slavery does not occur in any part of its business or in its supply chains.

SIG has a number of policies which support this and apply on a Group-wide basis. Some key policies and related principles are noted below:

### **Code of Conduct**

Our Code of Conduct emphasises the Group's obligation to comply with all applicable local laws, legislation and regulations in all the countries in which we operate. As well as outlining the standards and the conduct that is expected of employees, the Code of Conduct underlines the zero-tolerance approach to any form of Modern Slavery, and the commitment for acting ethically and transparently to protect the human rights of everyone associated with SIG. The Code also stipulates that SIG will ensure that all employment is freely chosen, that wages and working conditions are fair and that we adhere to all legal minimum age requirements in our operating countries. We expect all employees to take responsibility in upholding these standards when considering any third-party associations including, but not limited to, customers, suppliers or contractors.

### **Our Ethical Trading and Human Rights Policy**

This policy sets key principles for SIG and its business partners. SIG commits to avoid violation of human rights, either directly or indirectly, to operate in accordance with the Universal Declaration of Human Rights and to take account of other internationally accepted human rights standards.

### **Our Whistleblowing Policy**

This encourages reporting of genuine concerns about malpractice, illegal acts or failures to comply with recognised standards of work without fear of intimidation or victimisation. The policy applies to all employees and other stakeholders, including suppliers and customers. Employees are advised to make their line managers aware of anything which might amount to Modern Slavery or alternatively to report their concerns to the HR team or through our whistleblowing procedure.



### **Diversity, Equality and Inclusion Policy**

This policy applies in the UK, recognises the value we place on a diverse workforce and the contribution of all employees in our Group. The policy emphasises that we do not tolerate discrimination in any form and that we are committed to providing all employees with equal opportunities regardless of race, religion, gender, sexual orientation, disability, age or political beliefs.

### **Chain of Custody Policy**

SIG businesses with supply chains linked to forestry also subscribe to a Chain of Custody Policy. The Policy is aimed at implementing chain of custody requirements in accordance with the standards of the Forestry Stewardship Council and Programme for the Endorsement of Forest Certification. Although the Act does not apply to the Group's businesses outside the UK, SIG has adopted an overall Group approach to this issue and this policy statement applies to SIG businesses outside the UK to the greatest extent practicable.

Copies of our Code of Conduct and the above policies can be found [here](#). The Modern Slavery Statements for the years ended 31 December 2016, onwards can be found [here](#).

### **DUE DILIGENCE PROCESSES**

Underlying processes vary from country to country. In respect of SIG's UK operations and supplies of materials and products into the UK, the following steps have been taken to ensure due diligence in the supply chain:

#### **SIG Assured**

This is a key element of due diligence in our supply chain. SIG Assured is SIG UK's compliance tracking system that ensures the products we stock, by participating suppliers, meet essential regulatory compliance. The system evolves to meet ever changing regulatory legislation and guidance and has been extended to include specific questions in respect of Modern Slavery. Whenever UK customers see the SIG 'shield of assurance' stamp, they can be confident that their purchase is fully traceable and supported by SIG Assured assessment process. This stamp gives our customers peace of mind that items supplied by the Group's participating suppliers have been considered against various legislative requirements including our obligations under the Modern Slavery Act 2015.

In 2023 suppliers accounting for 96% of SIG UK's sales were reviewed by the SIG Assured scheme and details of all assessed suppliers, listed on the SIG Assured website, can be found [here](#). We believe that our primary suppliers are less likely to present material risks in terms of Modern Slavery and human rights as, for the most part, they are large multi-national corporations with strong governance procedures in place.

#### **SIG Assured – Supplier Risk Management**

In compliance with good business practice and our ISO 9001:2015 accreditation we have utilised a questionnaire for all our suppliers. This helps identify both existing and new suppliers who are able to assist us with maintaining a consistently high standard of quality throughout the business. These questions cover all aspects of a supplier's ethical supply chain, including



policies in place covering anti-bribery and corruption, equality and fair treatment, anti-bullying and harassment, whistleblowing, working time and Modern Slavery. Suppliers outside of the UK & the EU are also required to confirm that they are not involved in using forced or prison labour or child labour and that the national or living wage is paid to all employees.

SIG Assured continually risk assesses all suppliers. Compliance Managers complete at least 40 full supplier audits per year across all UK suppliers on a rotating risk re-visit calendar. These measures help SIG identify, measure and mitigate potential risks around regulatory standards and legislation. This supports our commitment to continuous compliance monitoring and more effectively facilitate in-house assurance and continuous improvement of supply chain management.

We reserve the right to cease the purchase of products or services from suppliers who refuse to complete our questionnaire or who are unable to substantiate their responses or provide suitable supporting documentation when requested.

### **Reporting Concerns**

SIG has a confidential whistleblowing procedure for the reporting of concerns. It is available to employees and also other stakeholders, including suppliers and customers. Matters can be raised with SIG or externally with Navex. The whistleblowing process is promoted widely across sites. During 2023 no whistleblowing reports, relating to allegations of any suspected or actual breach of our obligations under the Modern Slavery Act, were received.

## **RISK ASSESSMENT & MANAGEMENT**

### **Supplier Audits and Risk Assessments**

SIG processes require initial onsite audits of own label suppliers and we have appointed a third party to review and audit our suppliers who are domiciled or operate manufacturing sites outside of the EU. Suppliers who fail to meet SIG's working condition standards and requirements are not engaged. Following a positive initial assessment, regular onsite audits are conducted thereafter, on a risk assessed frequency basis. Working conditions and ethics are assessed, as are areas such as quality management and health and safety. The audit results inform SIG's assessment of risk and influence the decision as to whether to continue working with the supplier.

### **Audit & Risk Committee**

Risk Management and mitigation is a key area of focus for SIG. Across all areas of the business, we work hard to maintain risk awareness and have implemented a range of measures to help identify, manage and mitigate potential risks and uncertainties that could impact our business, including those risks arising from modern slavery and broader human rights issues. These measures include:

- We have a risk appetite process which includes an annual assessment of our risk appetite with regards to legal compliance and reputational risks. As a result, we seek



to avoid actions that present a risk of significant reputational damage and ensure that we are a compliant organisation and invest appropriately to ensure that there is a robust control environment to maintain a high level of compliance with our legal obligations.

- We have also implemented robust procedures to ensure that principal risks and uncertainties are identified and appropriately managed. This process includes holding meetings with our operating company leadership teams to identify the risks within their operations. These are consolidated and, in conjunction with a series of discussions held with the Executive Leadership Team and Non-Executive Directors, provide the inputs to identify and validate our principal risks. While modern slavery and broader human rights issues are considered as part of this process, no material risks or concerns were identified in 2023.
- SIG also has a Sustainability Committee which also considers and reviews SIG's broader Environmental, Social and Governance related risks, including modern slavery and human rights issues. No material risks or concerns were identified, as part of this process, in 2023.

### **Training SIG Group**

All employees received online training with regards to both organisational arrangements and their personal obligations with regards to the Code of Conduct, which includes sections on Modern Slavery and whistleblowing.

### **Labour Providers**

All personnel providers are engaged on written terms covering aspects such as fair employment and the right to work. All temporary workers are subject to induction which covers relevant SIG policies and procedures, including SIG's ethical standards. Each business unit regularly reviews and develops its HR policies and controls.

## **CONTROL AND EFFECTIVENESS OF THE MEASURES TAKEN**

Our leading KPIs to measure and determine the effectiveness of the steps being taken to combat all forms of Modern Slavery are by analysing our training completion as well as any reported incidents of Modern Slavery during the year.

### **Reported Incidents and Risks**

No risks reported

No incidents reported

In 2022 we acquired a risk intelligence database to ensure we have the capability to screen our key suppliers for any allegations, enforcement investigations or prosecutions relating to modern slavery, human trafficking, and other human rights abuses. We now regularly screen our key suppliers across our UK and European businesses and did not identify any risks or issues during 2023.



#### FURTHER ENHANCEMENTS FOR 2024

Our focus for 2024 is to continue to build upon our robust compliance culture and maintain the high standards we work to. We shall continue to work closely with and monitor our suppliers to ensure we are sourcing our products in a responsible and transparent manner. We fully expect our suppliers to operate in full compliance with all applicable laws and more widely in respect of Modern Slavery.

#### APPROVAL

This Modern Slavery Statement was approved by the Board of SIG plc for and on behalf of SIG plc and its relevant subsidiaries in relation to the financial year ended 31 December 2023.

A handwritten signature in dark ink, appearing to read 'Gavin Slark', written over a horizontal line.

Gavin Slark  
Chief Executive Officer  
SIG plc

2 May 2024