

## MODERN SLAVERY STATEMENT OF SIG

SIG plc is the parent company of the SIG group ("SIG"). Pursuant to s.54 of the Modern Slavery Act 2015, this statement constitutes SIG's slavery and human trafficking statement ("Modern Slavery Statement").

SIG plc (the "Company") and its subsidiaries, including (but not limited to) SIG Trading Limited, SIG Distribution Limited, SIG Exteriors Limited and SIG Insulation Limited, (together the "SIG Group" or "Group") have a zero tolerance approach to any form of modern slavery and we are committed to acting in an ethical manner and with integrity and transparency in our business dealings. This statement outlines the steps taken by the SIG Group in the financial year ending 31 December 2017 to ensure that slavery and human trafficking is not taking place within any part of our business or within our supply chains.

The Modern Slavery Act 2015 prohibits slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). SIG is committed to combatting all forms of Modern Slavery that could in anyway be connected to our business and supply chain.

### About SIG

SIG is a leading distributor of specialist building products. Our core product areas are exteriors, interiors, insulation & energy management.

The majority of the products SIG distributes have been 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. SIG companies also operate in Benelux, Poland, Ireland and the Middle East. In 2017 the SIG Group had an annual total turnover of £2.8bn. 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 suppliers [here](#).

### Group wide policies in relation to Modern Slavery

SIG is committed to acting ethically and with integrity in all of its business dealings and relationships, and to taking appropriate and proportionate steps to ensure that modern slavery or human trafficking does not occur in any part of its business or in its supply chains.

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

- Our Ethics Policy sets out a number of fundamental principles and values. The policy refers to our respect for human rights, freedom of association and prohibiting forced or child labour.
- Our Ethical Trading and Human Rights Policy sets key principles for SIG and its business partners. SIG commits: to not being involved in human rights violations, 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 Corporate Responsibility Policy provides that SIG will work to ensure that the welfare of workers and the labour conditions within our supply chain meet or exceed recognised standards.
- Our Whistleblowing Policy encourages reporting of genuine concerns about malpractice, illegal acts or failures to comply with recognised standards of work without fear of reprisal or victimisation. It applies to workers and other stakeholders, including suppliers.

While this legislation 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 the above policies and the Modern Slavery Statement for the year ended 31 December 2016 can be found [here](#).

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. A copy of that policy is [here](#).

### **Steps taken to address Modern Slavery risk**

SIG's global businesses all operate under the above policies; however 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:

#### *Supplier audits and risk assessments*

SIG processes require initial onsite audits of suppliers from outside the EU and many suppliers within the EU. Following this initial assessment, regular onsite audits are to be conducted thereafter, usually on an annual or bi-annual 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 decision as to whether to work with the supplier.

#### *Supply chain due diligence*

In the UK, SIG has a compliance system (SIG Assured) which considers and verifies products supplied to many businesses in SIG against regulatory standards (for example in respect of CE marking and the Registration, Evaluation, Authorisation and restriction of Chemicals (REACH)). All accredited suppliers are listed on the SIG Assured website which can be found [here](#). The system evolves to meet ever changing regulatory legislation and guidance and is being extended to cover a wider supplier base and to include specific questions in respect of Modern Slavery.

#### *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.

#### *Reporting Concerns*

SIG has a confidential whistleblowing process for the reporting of concerns. It is available to employees and also agents, contractors, suppliers and customers of SIG. Matters can be raised with SIG or externally with Expolink. The whistleblowing process is promoted widely across sites.

#### *UK operations risk assessment*

Key stakeholders in the UK attended a Modern Slavery workshop which comprised training session and a risk assessment exercise. Risk areas were discussed and proposals for further enhancement are being considered.

#### *Certifications*

SIG has achieved accreditation against numerous supplier pre-qualification programmes, many of which have questions relevant to Modern Slavery as standard. A list of accreditations can be found [here](#).

Within its sphere of influence, SIG strives to ensure that its suppliers follow its commitment to ethical conduct, including the Group's approach to forced and involuntary labour. Where non-compliance is identified, SIG will engage with the relevant supplier and promptly take appropriate action, which may include not appointing or re-appointing the supplier.

#### **Further enhancements**

Further enhancements to the procurement and supply chain processes of the SIG group in the UK and more widely in respect of Modern Slavery are being evaluated.

#### **2018 Targets to build on our approach to Modern Slavery**

- Review the areas of concern highlighted and work alongside suppliers, customers and interested organisations to eliminate risk from our businesses and supply chain.
- Maintain our activity from 2017, working with suppliers to help them meet our objectives.
- Review our Own Brand factory audit programme and establish if this is the most effective way to support our approach to Modern Slavery.
- Review how we can be more effective in collaborating with both customers and suppliers to support our approach to Modern Slavery.

#### **Approval**

The Board of SIG plc has approved this Modern Slavery Statement.



.....

Director for and on behalf of SIG plc

25 June 2018