



# Polypipe Group plc

## Modern Slavery Statement 2020

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- Suppliers
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This statement, relating to the financial year ending 31 December 2019, is made pursuant to the section 54(1) of the Modern Slavery Act 2015 and outlines the steps we have taken as an organisation to assess our operations and supply chain to mitigate any risk of slavery and human trafficking.

## Our Organisation

Polypipe is one of Europe's largest and most innovative manufacturers of plastic piping and energy efficient ventilation systems for the Residential, Commercial, Civils and Infrastructure sectors. We operate across Europe and the Middle East, from 19 locations. Manufacturing over 90% of our own products and managing much of our own distribution, we view our overall risks to be low, however, we are not complacent and have a zero tolerance policy towards any modern slavery or human trafficking rights violations.

Polypipe plc and its subsidiaries are committed to conducting business ethically and responsibly and fully support the aims of the Act and associated standards. We are pleased to restate our commitment to developing and improving processes throughout our organisation to actively prevent the use of slavery or human trafficking either in our own companies or across our supply chain. We remain committed to tackling slavery and human trafficking wherever we can and continue to monitor what we believe are key areas of our operation that could potentially be affected; our suppliers and their supply chain processes, agency workers and employees.



**3,139**

Polypipe Employees

**3,300**

Suppliers



**19**

FACILITIES IN THE UK,  
CONTINENTAL EUROPE AND  
THE MIDDLE EAST





## Suppliers

- Where appropriate we will engage directly with both current and new suppliers in respect of our anti-slavery policy in order to gain a proper understanding of the measures they have in place within their own business and supply chain, inclusive of full and detailed site audits, where appropriate.
  - During 2019 Polypipe's procurement representatives from across our business units undertook 28 site audits across the UK and the globe based on a risk assessed profile. We will continue to undertake such duties throughout 2020 to effectively monitor and assess our supply chain whilst recognising that collaborative working is vital to effectively mitigate issues and implement positive change where needed.
- Our contractual documentation continues to incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour and child labour in line with our policy and we stipulate that our contracted suppliers must hold their own suppliers to the same standards.
- We reserve the right to terminate any contractual arrangement if there is breach of our anti-slavery policy.
- We expect all our suppliers to familiarise themselves with our policy and to act at all times in a way that is consistent with its values.



## Agency Workers

- We only engage with agency workers sourced through reputable and local agency providers.
- Where appropriate, we will engage directly with our agency providers in respect of our anti-slavery policy in order to gain a proper understanding of the measures they have in place within their own businesses and undertake detailed site audits relating to their payment practices, conditions and legal compliance processes, where appropriate.
- We require that all agency providers evidence a worker's right to work within the country in which our business resides.





## Employees

- We verify that all employees have the right to work in the country in which our business resides upon commencement of employment.
- All employees are given a contract of employment before commencement and an Employee Handbook in line with appropriate legislative requirements.
- All employees are paid in accordance with their roles and above minimum statutory pay provisions, which is again monitored through our internal audit practices.

During 2019 no evidence of modern slavery or forced labour was found in our supply chains as a result of our site inspections. Polypipe complies with the employment laws of every country in which we operate in and expects those that we do business with to do the same. We continue to take steps to provide our procurement and HR personnel with appropriate training to understand the broader issues of modern slavery so as to assist them in appreciating the extent of the problem within the UK and across the globe, and to identify areas of the business that may be at risk from inappropriate practices.

Mandatory refresher training is undertaken on an annual basis. In addition to this broader awareness training is made available to all management on an ongoing basis within Polypipe's E-Learning system.

Our Whistleblowing procedure allows any employee the right to raise any concerns without the risk or fear of reprisal and we encourage and empower our employees to feel confident in speaking out about any concerns which they may have.



**Martin Payne**

Chief Executive Officer

Signed for on behalf of Polypipe Group plc.