



## Anti-slavery and Human Trafficking Statement 2024

The following statement (the **"Statement"**) is made in accordance with section 54 of the Modern Slavery Act 2015 ("**MSA**"), in respect of the year ending 31 December 2024 for Zentia Limited (**"Zentia"**). This statement is also made on behalf of all subsidiaries (including Zentia Profiles Limited) incorporated in the UK within the Zentia group of companies (the **"Zentia Group**") who are required to make a statement pursuant to the MSA.

At Zentia, we recognise that there is a risk of modern slavery within our operations and supply chain. However, we take responsibility for managing our business and supply chain to eliminate the risks of modern slavery. We take a zero-tolerance approach to slavery and human trafficking and are strongly committed to ensuring that all Zentia colleagues, as well as the people who work on our behalf are both protected from it and aware of the risks.

There were no instances of slavery or human trafficking concerns raised to us during the financial year ending 31 December 2024.

#### The business

Zentia is a manufacturer of a wide range of mineral ceiling tiles, suspension grids, and floating ceiling systems at its two manufacturing sites in Gateshead, Tyne and Wear. As an evolution of Armstrong Ceiling Solutions, we have over 100 years of knowledge and experience, Zentia is the UK's market leading manufacturer of complete ceiling solutions, offering a shorter supply chain to the construction industry in the UK and Ireland, and providing specifiers and ceiling contractors with reliable products they can trust.

The Senior Leadership Team ("**SLT**") has ultimate responsibility for managing modern slavery risk and our approach to modern slavery is integrated into our broader approach to business conduct and risk management. The responsibility to speak up against any wrongdoing sits with everyone across our business and colleagues are encouraged to report any issues immediately via their line managers or in accordance with our established Whistleblowing Policy without fear of reprisal.

#### **Compliance and governance**

Zentia has a full suite of policies which are accessible to colleagues via central and accessible document folders or upon request via People Services. Our policies are reviewed on a regular basis ensuring that they are up to date with current legislation, where applicable. Regular training and awareness activities form an integral part of Zentia's business activity to embed our policies across our business to ensure that Zentia remains a safe and good place to work.

Zentia is committed to fostering an equitable and diverse environment which is further complemented by the comprehensive training content delivered to our colleagues, examples of which range from sexual harassment training to equality and diversity training. Training is provided both in person and online ensuring accessibility to all colleagues.

We operate a fair and transparent recruitment process ensuring that everyone we employ has a right to work in the territories in which we operate in. We have an inclusive culture, enshrined in our policies and practices as well as our competitive remuneration packages.

We have a range of wellbeing incentives available to all colleagues to promote healthy living and we recently hosted voluntary occupational health appointments during 2024 to provide colleagues with an opportunity to undergo routine health checks and raise any health concerns.

### Our supply chain

At Zentia, we are committed to our local communities and environment. Our long history of environmental responsibility includes careful selection and use of recycled waste materials, energy and raw materials into our production, an area we recognise as being at higher exposure of human rights risk. We only work with suppliers who provide us with responsibly sourced products and materials.

Our Supplier Code of Conduct ("**Code**") sets out the clear expectations across Zentia for compliance with ethical standards including modern slavery concerns. We expect all of our suppliers to sign up to the Code which is supplemental to our standard terms and conditions. The Code sets out how Zentia: (i) conducts business practices ethically and in accordance with applicable laws and regulations; (ii) behaves fairly with colleagues, customers and suppliers; and (iii) provides a safe route for anyone to raise concerns, either through our Head of Procurement or General Counsel with complete confidentiality and no fear of retaliation.

In 2024, over 97% of our direct spend was with suppliers who had undergone our due diligence process of assessing suppliers (and subsequently added to our approved suppliers list) against our values and interrogating their business practices and procedures. This is up from 96% in 2023 and 53% in 2022 and we are aiming to reach 100% of our suppliers in 2025.

## The Environment

In 2023, we set a series of Environment Social Governance ("**ESG**") targets to be achieved by 2025, such as reducing carbon emissions per m2 of tile produced by 30% and publishing Environmental Product Declarations ("**EPD**") for all of our manufactured products. During 2024, we made good progress towards these goals, publishing product level EPDs for approximately 74% of our products. In addition to using recycled paper packaging material as one of the main components for our ceiling tiles, we invested in energy efficient drying ovens which are expected to reduce our gas usage further driving down our gas emissions within the production process.

At Zentia, safety is our number one priority whereby we pledge to integrate safety and risk management into our daily operations, ensuring that it becomes an integral part of our operational culture. As part of our mission to continually improve our health and safety performance, we have launched a safety culture survey developed by the Health and Safety Executive. By giving everyone a voice and using the feedback from the survey, we hope to gain insights into the current safety climate within the business and provide opportunity to continually improve our health and safety performance by further enhancing our commitment to make Zentia a safe place to work for our colleagues and more widely in respect of the environment we operate within.

# Training

In 2025, all colleagues will undertake refresher training in respect of modern slavery and identifying potential risks associated with modern slavery. This training also forms part of the mandatory onboarding process for all new recruits. In addition, regular training activity across the business will be provided to further complement our colleagues' skillsets and to ensure compliance with all legislative requirements in respect of such training.

## Progress

During 2024, we have taken further steps to increase awareness of issues around slavery and human trafficking and to measure the effectiveness of our policies and procedures we have:

- continued to implement supplier due diligence processes and continued to work towards an approved supplier list, including risk assessment of all suppliers;
- focussed on safe working practices and issued a survey to all colleagues to allow them to voice any health and safety concerns, confidentially, to strengthen our health and safety practices and ensure we continue to have a safe place to work;
- reviewed and revised policies in line with legislative changes, creating an inclusive and good place to work for all colleagues; and
- focus on the local communities and environment in which we operate to reduce our carbon footprint.

# Plans for the next financial year

Our approach to modern slavery is ongoing and we will:

- refresh training in respect of modern slavery to all colleagues to further raise awareness of modern slavery;
- continue due diligence across our supply chain ensuring that we only do business with responsible suppliers; and

• assess our policies and procedures to ensure they remain relevant and effective.

### Declaration

This statement has been made in accordance with the reporting requirements of Section 54, Part 6 of the Modern Slavery Act 2015 for the year ending 31 December 2024. This statement applies to the Zentia Group.

This statement was approved by the SLT on 9 December 2024 and has been signed by the Managing Director on behalf of the SLT.

Gert van Doormalen Managing Director