



Anti-slavery and Human Trafficking Statement 2022

The following statement (the “**Statement**”) is made pursuant to the Modern Slavery Act 2015 (“**MSA**”), in respect of the year ending 31 December 2022 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 pride ourselves on offering a reliable service underpinned by our corporate values. 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 protected.

There were no instances of slavery or human trafficking concerns raised to us during the financial year ending 31 December 2022.

Business structure

Zentia is the UK’s market leading manufacturer of complete ceiling solutions, with its registered companies in Tyne and Wear, UK. We manufacture a wide range of mineral ceiling tiles, suspension grids, and floating ceiling systems at our two factories in Gateshead, Tyne and Wear.

As an evolution of Armstrong Ceiling Solutions, we were assisted in our commitment to no slavery or human trafficking by the resources available across the group. As a newly established standalone business, we remain committed to maintaining our practices to combat any risks of slavery and human trafficking.

With over 100 years of knowledge and experience, Zentia is the UK’s only major ceiling manufacturer, 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 Board has ultimate responsibility for managing modern slavery risk and works closely with members of the extended senior management team such as the Head of Human Resources, the Head of Procurement and General Counsel in respect of business practices to ensure that any risks are identified and addressed immediately. Our approach to modern slavery is integrated into our broader approach to business conduct and risk management.

Our colleagues

Zentia operates a rigorous recruitment selection process for all recruitment decisions and appointments. It includes obtaining documented proof of the individual's right to work in the UK or appropriate country in which they will be employed.

Zentia has a full suite of governance policies which are accessible to colleagues 24/7 via central and accessible document folders and/or upon request via Human Resources. Our policies are reviewed and refreshed on a regular basis and where appropriate, are approved by the Senior Management Team. Regular training and awareness activities form an integral part of Zentia's business activity to embed our policies across our business.


Our relationship with our colleagues starts at the recruitment stage and we are committed to our people. We are committed to compliant and fair employment practices, providing a work environment free from discrimination wherever we do business. Any employment related decisions are made on the basis of objective criteria in respect of performance. We treat each other with respect and dignity and celebrate the diversity of our workforce. Our colleagues are paid fairly commensurate with their skillset and experience. We occasionally employ temporary or agency workers to meet business needs as appropriate. The recruitment of temporary workers is done via a reputable agency and those workers take part in the same onboarding process as our permanent employees. The temporary or agency workers are paid an hourly rate commensurate with their skillset which is openly communicated to them by Zentia.

Our supply chain

At Zentia, we have a commitment to our local communities and environment. Our long history of environmental responsibility includes careful selection and use of energy and raw materials, an area we recognise as being at higher exposure of human rights risk. Suppliers are required to provide us with products and materials that are responsibly sourced.

Our Supplier Code of Conduct ("**Supplier Code**") sets out the clear expectations across Zentia for compliance with ethical standards including modern slavery concerns. The Code is overseen by Procurement and we take compliance with our Code extremely seriously. Our 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 their procurement contact, the Head of Procurement or General Counsel with complete confidentiality and no retaliation.

The Code also sets out the standards of behaviour expected from all our suppliers, in particular, the fair treatment of their employees and to have a zero tolerance to any form of slavery and human trafficking in their own supply chains. The Supplier Code is embedded within our standard terms of supply requiring suppliers to comply with our Supplier Code, anti-slavery and human trafficking legislation (including the MSA where applicable) and we



continue to roll this out more broadly across the business where existing contracts are up for renewal.

We have an active commitment to health and safety and vigilance throughout the lifecycle of our products to reduce the risks to natural resources. We are continuing to work hard to research our key improvement areas and we have recently established a team to assess our environmental impact in more depth beyond the scope of our ISO 14001 certification. In addition, Zentia has committed to undertaking an Environment, Social and Governance (“ESG”) review to identify its key priorities and targets to support a delivery of improvements in respect of ESG.

Mitigating modern slavery risk

The manufacture and distribution of our product range involves the sourcing of various raw materials and finished goods from suppliers, predominantly in the UK and Europe and occasionally the United States or from other regions as necessary.

We have focused on strengthening our due diligence processes through the implementation of an approved vendor list to protect the rights of employees in our supply chain. This has included conducting a comprehensive review of our sustainable procurement strategy and onboarding a dedicated procurement team to undertake the due diligence activity and to continue to monitor it to ensure that all vendors are adequately vetted by us. We undertake a risk assessment of each supplier to ensure that suppliers have policies and practices in place to alleviate any risks associated with slavery or otherwise.

We spent approximately £48m with third parties in FY22. The majority of this spend took place in the UK and Europe. Wherever possible, we enter into written contracts with all of our suppliers and we do not pay cash for services.

Training

It is important that our colleagues are aware of the issues relating to modern slavery and support our values. We intend to offer training to existing employees and consultants to educate them around the risks associated with modern slavery and the steps to be taken in the event of any concerns.

Progress

During 2022, we have taken the following steps to improve awareness of issues around slavery and human trafficking and to measure the effectiveness of our policies and procedures:

- We are implementing enhanced supplier due diligence processes and are working towards an approved vendor list, including risk assessment of all suppliers.

- We have updated our terms and conditions to incorporate the Supplier Code and to ensure that existing suppliers agree to the Supplier Code upon renewal of any existing agreements.
- We have extended the questions contained in our sourcing templates to request more detailed information on potential suppliers' policies regarding modern slavery so we can more easily and effectively identify potential risk of modern slavery.
- We have also committed to an ESG review to facilitate goal setting based on key priorities and targets with a particular focus on improvements.

Impact of the Coronavirus pandemic

We are aware of the challenges that continue to be presented by the Coronavirus pandemic and have continued to monitor our risks during this period. Our assessment is that our risks as regards modern slavery have not increased during this period, given the nature of our supply chain, the geographical location of the majority of our suppliers and the additional due diligence measures we have introduced in respect of our suppliers.

Plans for the next financial year

We shall continue to focus on activities which build upon our current policies, processes and procedures and shall continue monitoring our supply chain in the countries in which we operate. We will raise awareness of modern slavery and the risks associated with it through training of all existing employees and contractors.

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 2022. This statement applies to the Zentia Group.

This statement was approved at the Senior Management Team meeting on 12 December 2022 and has been signed by the Managing Director on behalf of the Board of Directors.



Dirk Jaspers
Managing Director