



Anti-slavery and Human Trafficking Statement 2023

The following statement (the “**Statement**”) is made pursuant to the Modern Slavery Act 2015 (“**MSA**”), in respect of the year ending 31 December 2023 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 Group colleagues, as well as the people who work on our behalf, are protected.

There were no instances of slavery or human trafficking concerns that we are both aware of nor raised with us during the financial year ending 31 December 2023.

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 premises 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 relatively new established standalone business, we remain committed to maintaining our practices to combat any risks of slavery and human trafficking.

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 our approach to modern slavery is integrated into our broader approach to business conduct and risk management.

Our colleagues

Zentia has policies and procedures in place to ensure that all colleagues have a safe working environment and have the resources and tools required to safely undertake their roles.

Zentia has a full suite of policies accessible to colleagues 24/7 via central and accessible document folders and/or upon request via People Services. Our policies are reviewed and refreshed on a regular basis to ensure that they adhere to the 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. We have also recently recruited a Learning and Development Business Partner to strengthen Zentia's commitment to providing colleagues with the necessary skills and knowledge to undertake their roles.

At Zentia, we are committed to compliant and fair employment practices with competitive benefits and wellbeing initiatives. Any employment related decisions are made on the basis of objective criteria in respect of performance. We offer competitive benefits and wellbeing initiatives with a work environment free from discrimination wherever we do business. We treat each other with respect and dignity and celebrate the diversity of our workforce, further strengthened by Equality and Diversity training delivered to senior colleagues across the business during 2023.

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. We enter into written contracts with all of our suppliers and do not pay cash for any services procured by us.

Our Supplier Code of Conduct ("**Code**") sets out the clear expectations across Zentia for compliance with ethical standards including modern slavery concerns. The Code is embedded within our standard terms of supply requiring suppliers to comply with it, 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. The Code is overseen by Procurement and we take compliance with it extremely seriously. 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 their procurement contact, the Head of Procurement or General Counsel with complete confidentiality and no retaliation and (iv) expects by way of standards of behaviour 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.

Mitigating modern slavery risk

From 2022, we overhauled how we manage our supply chain and onboard suppliers to ensure that we are only procuring materials from suppliers we trust. As part of the overhaul, we require suppliers to complete a questionnaire requesting suppliers to confirm compliance with the Code. Subject to the supplier's response, the supplier is entered on to an approved supplier list maintained within Zentia. In 2023, over 96% of our direct spend was via our supplier approval process, up from 53% in 2022. We are continually seeking to improve this target on a month-by-month basis throughout the year. In 2023, we implemented a supplier audit schedule consisting of both remote interviews and on-site assessments across a number of our key suppliers. These assessments will continue into 2024 where we will continue to assess our direct spend.

We have an active commitment to health and safety and to create a culture where all of our employees and contractors can work free from injury. This commitment is demonstrated through our certification to the ISO 45001:2018 standard.

During 2023, we have carried out an extensive review of our ESG performance and have identified six core topics covering carbon emissions, sustainable products, supply chain management, health and well-being, customer satisfaction and employee satisfaction. For each topic, we have an improvement plan in place along with targets to be met by the end of 2025.

Training

In 2023, all colleagues undertook training in respect of modern slavery and identifying potential risks associated with modern slavery. This training forms part of the mandatory onboarding process for all new recruits.

Progress

During 2023, 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 implemented supplier due diligence processes and continuing to work towards an approved vendor list, including risk assessment of all suppliers.
- We have implemented a supplier assessment schedule consisting of both remote interviews and on-site assessments across a number of our key suppliers which will continue into 2024.
- We have set specific ESG targets in six core areas based on key priorities and targets with a particular focus on improvements.
- We have provided training to all colleagues in respect of modern slavery to further mitigate the risks within our business.

Plans for the next financial year

We will continue to monitor our business practices and our supply chain for any risks of modern slavery with a commitment to eliminating those risks.

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 2023. This statement applies to the Zentia Group.

This statement was approved by the Senior Management Team on 1 December 2023 and has been signed by the Managing Director on behalf of the Board of Directors.

A handwritten signature in black ink, appearing to read 'Dirk Jaspers', written in a cursive style.

Dirk Jaspers
Managing Director