



N O R C R O S

Norcros plc & Norcros Group (Holdings) Ltd - Modern Slavery Act Statement

Introduction

This statement contains a summary of the measures taken by Norcros to implement the requirements of the Modern Slavery Act 2015.

Overarching Objective

Norcros is committed to the best corporate practices and ethical values. The Company aims to act with integrity to all stakeholders and undertakes its business in a lawful manner and takes reasonable measures to require the members of its supply chains to do the same.

*We do not accept and will not tolerate slavery and human trafficking,
both within Norcros and in its supply chains.*

Our Approach

We recognise that human rights issues (including modern slavery and human trafficking) are not limited to our own operations but can occur everywhere along the value chain. We will focus on our own operations, but we also believe all those involved - suppliers, customers, partners and other key stakeholders – should work together to develop practical risk-based solutions for a responsible and inclusive supply chain. Going forward, we will continue to review our operations and supply chain to manage potential modern slavery and human trafficking risks, and the following section outlines key steps taken during the past financial year.

Actions Taken

During the year 1 April 2021 – 31 March 2022 the Company has taken the following key steps to meet the requirements of the Act:-

- Reviewed and updated our Group Code of Ethics & Standards of Business Conduct, which reinforced our commitment to not accepting or tolerating the use of child labour or forced labour (i.e. Modern Slavery) anywhere in our own business or our direct supply chain
- Continuing reinforcement of existing policies covering ethical business practices and legal compliance
- Confirming our overall approach to managing labour and human rights issues within our own operations and ensuring that our existing policies support us in mitigating and combating potential modern slavery and human trafficking risks and concerns
- Continuing to map our supply chain to identify risks relating to modern slavery and human trafficking using a credible global framework

- Strengthening risk assessment mechanisms by incorporating the consideration of ethical risk in business specific risk registers, business self-assessments and annual management declarations
- Ongoing due diligence, auditing and assessment of key supply chain partners
- Continuing implementation of processes to confirm with key supply chain partners their commitment to the eradication of slavery and human trafficking
- Continued monitoring and promotion of whistleblowing arrangements, to facilitate the raising of any concerns
- Introduced mandatory online awareness training on Anti-bribery and Corruption for all employees. Course completion rates are regularly monitored by the Audit and Risk Committee
- Updated our new supplier assessment process in China to ensure that new suppliers have appropriate contractual arrangements, a signed code of ethics, appropriate insurance cover, ISO standards covering key areas and external social audits of production facilities.

Actions to be Taken

- Introduction of mandatory online awareness training covering Modern Slavery Act requirements.

Approved by the Company

Approved by Norcros plc and Norcros Group (Holdings) Limited on 8 June 2022



Nick Kelsall
Chief Executive Officer