

MODERN SLAVERY STATEMENT

A) INTRODUCTION

Freefoam Plastics (UK) Ltd acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. This statement sets out our zero tolerance approach to modern slavery and the provisions taken by Freefoam Plastics (UK) Ltd. to combat modern slavery.

This statement is published under the provision of the Modern Slavery Act 2015 and refers to the financial year ending 31st December 2021 and to the continued compliance throughout 2022 and beyond.

B) ORGANISATIONAL STRUCTURE

Freefoam Plastics is an independently owned company and a leading manufacturer of a wide range of innovative uPVC fascia and soffit products. The Group also produce rainwater systems, external cladding and interior panelling systems for the building industry in Ireland, the UK and Continental Europe.

Freefoam began trading from Cork, Ireland in 1990 and is now a multinational organisation operating from multiple sites across the UK, Belgium, France and Germany, while the head office remains in Cork.

The labour used in Freefoam Plastics in pursuance of its operation is carried out in Ireland, the UK, and mainland Europe and Freefoam Plastics is compliant with all laws relating to employment and human rights in these jurisdictions.

C) DEFINITIONS

Freefoam Plastics considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

Freefoam Plastics acknowledges its ongoing responsibilities in relation to tackling modern slavery and commits to complying with the provisions made in the Modern Slavery Act 2015.

Freefoam Plastics understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Freefoam Plastics does not enter into business with any other organisation, in the United Kingdom, Ireland, Europe or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Freefoam Plastics Ltd. in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Freefoam Plastics strictly adheres to the minimum standards required under relevant employment legislation in the UK, Ireland and Europe.

E) SUPPLY CHAINS

In order to fulfil its activities, Freefoam Plastics use supply chains mainly related to plastic pellets, colour foam and foil, though we are supplied with a minimal amount of finished products. These suppliers are not intermediary traders. Rather, Freefoam Plastics maintains a close working relationship with suppliers, often involving site visits.

F) POTENTIAL EXPOSURE

Freefoam Plastics considers that it does not have a high risk of slavery and/or human trafficking existing in its supply chains as the Group has limited provision from countries where this would be a concern due to local protections.

G) STEPS

Freefoam Plastics believes that it carries out due diligence processes in relation to ensuring slavery and /or human trafficking does not take place in its organisation or supply chains.

Freefoam Plastics has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Freefoam Plastics has taken the following steps to ensure that modern slavery is not taking place:

- Training of those involved with Supply Chain Management to be aware of the company policy with regard to Modern Slavery (Purchasing Coordinator and Manager)
- A known zero tolerance policy in relation to Modern Slavery
- A recognised channel through our internal HR Department which is responsible for the Group, for those involved in the supply chain to raise any concerns that may come to our employee's attention
- An annual review of our suppliers, carried out in conjunction with the HR Department to assess the potential risks in our supply chain, particularly in relation to those suppliers operating in any country where protection against breaches of human rights may be limited

This statement has been approved by the Board of Directors of Freefoam Plastics (UK) Ltd.



Aidan Harte

Managing Director