

Tensar's Modern Slavery Statement for 2021 calendar year

The Tensar Group Limited and its UK subsidiaries are committed to its company values of health and safety, integrity, teamwork and diversity, accountability, continuous innovation, and having a customer centric mindset and solutions. Ensuring compliance with the UK's 2015 Modern Slavery Act, both within our UK businesses and their supply chains, is a key part of demonstrating our integrity and accountability, whilst keeping those who work for us and alongside us, safe.

Tensar's UK businesses' supply lines are primarily within the UK and EU and the supplies required for fabrication of Tensar's products are not of the types set out in the US Bureau of International Labour Affairs' List of Products that are produced by forced or indentured labour. With our Eastern Hemisphere office headquarters and our UK manufacturing based in Blackburn, Tensar complies with UK employment laws, and its UK employees are also able to participate in Trade union membership if they so wish. We have practical steps in place to ensure that pay is always above the applicable legal minimum, and we monitor working hours in line with applicable legislation.

No business can be complacent, and we recognise that forced labour can infiltrate many types of businesses which is why we continue to work at strengthening our compliance efforts and thereby live out our values.

In 2021, Tensar built on this further as follows: -

- 1) we continued to embed a global Code of Conduct to include key compliance areas including modern slavery.
- 2) carried out appropriate due diligence on proposed new business associates to check for compliance issues;
- 3) continued working with existing suppliers to ensure modern slavery compliance and requiring new suppliers to certify their compliance with our Anti-Modern Slavery Key Principles;
- 4) we continued the rolled out of a training programme for relevant new starters' inductions

In 2021, the disruption caused by Covid 19 continued to impact individuals and organisations across the UK and worldwide. The UK government issued additional guidance around modern slavery risks, asking companies to consider:-

- 1) the health and safety of workers
- 2) supporting suppliers
- 3) grievance procedures
- 4) recruitment; and
- 5) emerging risks.

As a company we continued our focus on company values and the continued awareness of our global code of conduct. The code which covers such matters as the importance of integrity and compliance, our complaint and reporting procedure which can be used on an anonymous basis to report any alleged wrongdoing to senior executives, the importance of fair employment practices around equal opportunity and equitable treatment, fair business practices, and recognizing and protecting human rights including prohibiting modern slavery in our business and supply chains. The Code is available in multiple languages to our employees.

We comply with all applicable UK legislation and rules regarding rights to work checks. We recognize that the construction industry can be one area in which there are forced labour risks – although usually it tends



to occur where individuals carry out construction services and we generally provide off-site design services and sell our products and solutions.

In relation to our UK business and supply chain, for our factory we continued to increase the scope of our due diligence programme for suppliers, requiring them to commit to our Key Principles for Countering Modern Slavery or to hold a commensurate policy. We also continue to embed a similar process in our UK sales company, Tensar International Limited.

In relation to our affiliate based in Wuhan, China which is part of the supply chain to our UK company for some of its international sales, in 2021 we continued to pay wages to all employees throughout the site closures. We have continued to provide PPE free of charge and operate increased cleaning routines to help to keep our employees safe. We had already renovated our Wuhan offices and optional dormitory in June and October 2019 to ensure a pleasant and high-quality working environment. Our dormitory is available free of charge to any employees who wish to use it, we also provide 3 meals per day free of charge to our employees on working days. We take care of the health of our employees, providing each with an optional yearly health check in August, and paying for health insurance for hospital costs not only for themselves but also for their immediate family. Inspection visits to our suppliers continued to be curtailed due to Covid 19 but we will monitor local restrictions and recommence those when reasonably practicable.

In 2022 we plan to continue to expand our due diligence in relation to our supply chains, provide further training and look for other reasonable improvements that can be made in relation to our understanding and management of forced labour risks.

As our Vice President, Mike Lawrence, says, "Trust is one of our most valuable assets. That is why the way we do business is just as important as what we sell."

A handwritten signature in blue ink, appearing to read "Luc Mechelaere", written over a horizontal dotted line.

Approved and signed on behalf of the directors by Luc Mechelaere, Director and Vice President Eastern Hemisphere for the Tensar division