



Tensar's Modern Slavery Statement for 2020 calendar year

The Tensar group of companies is 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 in both the office and manufacturing sites are also able to choose 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, however, 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 2019, Tensar built on this further as follows: -

- 1) we began work on a global Code of Conduct to include key compliance areas including modern slavery to raise awareness. The Code was rolled out in 2020.
- 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 carried out extensive renovation works at our offices and factory in China to improve conditions for our colleagues there during the course of 2019;
- 5) we selected and rolled out a global training programme to senior managers towards the end of 2019 that was completed during 2020 and we use this training programme for relevant new starters' inductions

In 2020, there was worldwide disruption caused by Covid 19. 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 in 2020 we focused on our company values, developing and rolling out a new global code of conduct, endorsed by our Chief Executive Officer, and covering 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 was made available in multiple languages to our employees in October 2020.

We comply with all applicable UK legislation and rules regarding rights to work checks, and 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.

As a business our first value and number one priority is health and safety. In the tumultuous year of 2020, we put additional safety procedures in place to help to protect our employees from Covid 19 – including distancing, PPE, and additional cleaning routines. We demonstrated our commitment to valuing the health of our employees by shipping face masks out to our business in China when supplies were unavailable locally due to supply chain pressures caused by Covid 19. In turn, when face masks were hard to obtain in the UK later on in 2020, we were able to ship face masks from our China business to our business in the UK, as part of helping to keep our employees safe. We also provided all staff in our Eastern Hemisphere business 5 reusable fabric facemasks that they could use for work as well as in their personal lives to help keep them safe.

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 began a similar process in our UK sales company, Tensar International Limited. In 2021 we are looking to continue to build in this area including exploring use of a due diligence platform as a tool, where appropriate from a risk perspective.

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 2020 we continued to pay wages to all employees throughout the site closures, and we kept all employees on throughout the site closure February to March 2020. We provided PPE free of charge and increased cleaning routines to help to keep our employees safe. Modern slavery training was provided by webinar to key roles in June 2020. 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 were understandably curtailed due to Covid 19 but we expect to recommence those in the course of 2021 when reasonably practicable.

In 2021 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 Chief Executive Officer, 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 blue ink signature, likely of Luc Mechelaere, written over a dotted line.

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