

## Tensar's Modern Slavery Statement for Financial Year Ending 31 August 2024

The Tensar Group Limited and its UK subsidiaries (collectively, "Tensar UK") 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 Labor 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 2024 Tensar built on this further as follows: -

- we continued to embed a global Code of Conduct and Business Ethics (the "Code of Conduct" or the "Code") to include key compliance areas including modern slavery.
- we carried out appropriate due diligence on proposed new business associates to check for compliance issues as well as implementing ongoing due diligence of existing business associates when renewing existing agreements in place;
- continued working with existing suppliers to ensure modern slavery compliance and requiring new suppliers to certify their compliance with our Key Principles for Countering Modern Slavery;
- 4) we continued the roll out of a training programme for relevant new starters' inductions; and
- 5) we introduced a new whistleblowing policy as a mechanism for reporting any concerns without fear of retaliation and in doing so raised awareness of our confidential reporting helpline.

As a company we continued our focus on company values and the continued awareness of our global Code of Conduct. The Code covers such matters as: the importance of integrity and compliance, our complaint and reporting procedures (which can be used on an anonymous basis to report any alleged wrongdoing to senior executives), the importance of fair employment practices around equal



Tensar Group Ltd. Tensar is a Division of CMC. Tensar is a registered trademark.

Registered Office: Units 2-4 Cunningham Court, Shadsworth Business Park, Blackburn, Lancashire, BB1 2QX, UK.

opportunity and equitable treatment, fair business practices, and recognising and protecting human rights including prohibiting modern slavery in our business and supply chains. The Code is available in multiple languages for our employees. In addition we now require mandatory training to be completed in relation to our global Code of Conduct on an annual basis.

We are committed to fair and ethical employment practices and comply with all applicable UK legislation and rules regarding rights to work checks. We have employment policies that protect our people from unfair treatment and promote a fair and inclusive workplace. We recognise that the construction industry presents a higher risk from a forced labour perspective, this tends to occur where individuals carry out construction services and we generally provide off-site design services as well as selling 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 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 2024 we maintained our regular inspection visits to our suppliers.

Moving forward, we plan to continue to expand our due diligence in relation to our supply chains, provide further training and identify opportunities for improvements that can be made in relation to our understanding and management of forced labour risks.

## **Assessment of Effectiveness**

During the financial year ending 31 August 2024, we assessed the effectiveness of our anti-slavery measures through our established reporting mechanisms and due diligence processes. No instances of modern slavery were identified through our reporting mechanisms, including our confidential reporting helpline and whistleblowing policy. Our ongoing supplier due diligence programme and regular inspection visits to our China-based affiliate continued to demonstrate compliance with our Key Principles for Countering Modern Slavery. The mandatory training programme for our global Code of Conduct has enhanced awareness across our workforce, contributing to our ability to identify and prevent potential risks.

SIGNED:

Approved and signed on behalf of the directors by Chris Buchanan, Vice President & General Manager Continental Europe, UK & Ireland for the Tensar division.





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