

ANTI-SLAVERY AND HUMAN TRAFFICKING

ANNUAL STATEMENT

for financial year 2016

According to the Section 54 of the Modern Slavery Act 2015 that came into force on 29 October 2015,

Icopal Limited (and its Republic of Ireland subsidiary company, Necoflex Limited) hereby confirms that the Company has taken the following steps during the financial year 2016 to ensure that slavery and human trafficking is not taking place in any of its supply chains or any part of its business:

The Management of the Company prepared and approved the Anti-Slavery and Human Trafficking policy

The policy has been distributed to all employees of the Company

The Anti-Slavery and Human Trafficking policy has been published on the Company's website

The policy will become a part of the Employee Handbook of the Company and will be introduced to every new employee of the Company



Paul Stel
Finance Director
Icopal Limited
25th January 2017

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Following recent legislative changes, all businesses with an annual turnover of £36 million must publish an anti-slavery and human trafficking statement each financial year.

Policy statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

Responsibility for the policy

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

HR Department has day-to-day responsibility for implementing this policy and for preventing or remediating the risk of modern slavery.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with the Company's Disclosures in the Public Interest Policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Training and communication

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, can be provided to staff if necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery is communicated to all suppliers, contractors and other business partners via the Company website.

Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

Board of Directors

Icopal Limited
25th January 2017