

Modern Slavery Company Statement

Modern Slavery Statement

This Statement is published in accordance with section 54(1) of the Modern Slavery Act 2015 ("MSA") and sets out the actions that Orbia Building and Infrastructure ("Orbia B&I"), and its subsidiary company of Warmafloor Limited, has taken during the financial year ended 31 December 2023 to address modern slavery. It also outlines the steps that Orbia B&I will continue to take to identify, prevent and, where found, eliminate modern slavery in its business and supply chains.

Introduction

Modern Slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Modern slavery is a crime and a violation of fundamental human rights and Orbia B&I recognises that this is a global issue taking many forms and affecting many industries and sectors. Orbia B&I acknowledges its responsibilities in respect of anti-slavery and human trafficking and is committed to improving its practices to combat slavery and human trafficking.

Orbia B&I acknowledges its responsibility to the Modern Slavery Act 2015 and will ensure there is transparency within the organisation, including all suppliers of goods and services to the business. This is part of our commitment to abolishing modern day slavery and human trafficking, not just from within our business but across our whole supply chain.

The Orbia Group and Orbia Building and Infrastructure

Orbia B&I, also sometimes known as Wavin, is part of the Orbia Group, a community of companies working together to tackle some of the world's most complex challenges. The Orbia community is strongly bound by a common purpose: To Advance Life Around the World. Our ultimate parent company is Orbia Advance Corporation, S.A.B. de C.V. ("Orbia") which has its head office in Mexico.

Orbia currently has approximately 24,000 employees worldwide, with operations in 50 countries.

Orbia B&I is a global leader in innovative solutions for the building and infrastructure industry. With over 60 years of expertise, we create healthy, sustainable environments worldwide. From clean water distribution to accessible sanitation, climate resilience to comfortable living spaces, we collaborate with municipal leaders, engineers, and contractors to future-proof communities. With 12,000+ dedicated employees, 65 production sites, and a global network, we serve 80+ countries, making a positive impact on lives globally.

Orbia B&I Organisational Structure in the UK and Ireland

Orbia B&I currently employs approximately 840 employees within the UK across 4 sites in South Yorkshire, Swadlincote and Chippenham. We have a further 66 employees based at our site in Balbriggan, Ireland.

Orbia B&I within the UK and Ireland has an approximate annual turnover of almost \$330M. Manufacturing, Engineering, Service Delivery, Finance, Commercial, IT and People functions are all located in the UK. Orbia B&I colleagues within the UK and Ireland work regularly with colleagues in Europe, APAC, US and Canada and Latin America.

Our Supply Chains

Orbia B&I's UK and Ireland supply chain includes approximately 1900 suppliers that supply goods and services from across 28 countries globally, from regions including Europe, India, Middle East, North America and Asia Pacific. Categories of supply include Raw Materials, Packaging, Industrial Equipment, Professional Services, HR and Logistics Services, IT Goods and Services and Workplace Services.

Orbia UK B&I offers manufacturing and delivery solution to a merchant network, servicing the UK via road and rail. Finished product is distributed via nominated logistics providers across a range of vehicle types to accommodate specific packing, type of handling units and volumetric requirements.

Our Policies on Slavery and Human Trafficking

Orbia has policies in place that prohibit any form of modern slavery or human trafficking in our supply chains and in any part of our business and has made those expectations clear to its suppliers. In May 2023, Orbia held its annual Ethics Month events, in which colleagues are required to complete online Code of Ethics training and invited to attend a webcast with the global Ethics & Compliance team. The 2023 online training module, like the 2022 course, reinforces Orbia's prohibition of modern slavery contained in its Code of Ethics, and the course has a dedicated discussion of this important topic.

Orbia also has publicly available global policies, including a Human Rights Policy ([Human Rights Policy | Orbia](#)) and Anti-Slavery & Human Trafficking Policy ([Anti-Slavery & Human Trafficking | Orbia](#)), all of which apply to Orbia B&I and which address this topic. These policies reflect our commitment to acting with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Orbia's 2023 Sustainability Report additionally makes clear Orbia's commitment to ensuring that its supply chain complies with human rights and modern slavery laws.

Orbia has policies in place to encourage individuals to submit reports of suspected violations of our Code of Ethics, as well as to ask for guidance related to policies and procedures. We have in place systems to protect whistleblowers and in May 2023, we refreshed Orbia's Speak Up, Investigations and Non-Retaliation Policy.

This Policy makes clear that anyone who raises a concern in good faith, including suppliers, are protected under Orbia's non-retaliation policy.

The Ethics Helpline is available 24 hours a day, 7 days a week, in all the languages of the countries where Orbia does business. The Ethics Helpline is available for anonymous reporting. We make Orbia's Ethics Helpline publicly available on Orbia's website (www.orbia.com), which means Orbia's business partners or other third parties, including B&I UK's suppliers, can report violations of the law, including making an anonymous report. All reports are fully reviewed and investigated, and the appropriate action taken as a result. Orbia's 2023 Sustainability Report details more information about the Ethics Helpline, including the fact that we received and addressed 374 matters in 2023.

Orbia's policies are developed by subject matter experts and are signed off at the Vice President level. As part of the Orbia family, Orbia B&I benefits from having a consistent global approach to these policies. We believe that it is important to review these policies periodically to ensure they meet evolving requirements, and the Anti-Slavery & Human Trafficking Policy was reviewed in January 2022 and is due to be updated in 2024.

Finally, sourcing of goods and service is governed by Orbia B&I's Procurement Policy, which requires all such activities to be undertaken in accordance with our Code of Ethics, which explicitly applies to our suppliers. Additionally, in December 2023, Orbia published its Supplier Code of Conduct, which sets forth Orbia's expectations on a variety of topics, including that suppliers will have processes in place to meet applicable labor and human rights laws. The new Supplier Code of Conduct will be disseminated to all Orbia B&I UK's suppliers during the course of 2024.

Due Diligence Processes for Slavery and Human Trafficking

We believe our biggest exposure to Modern Slavery to be within the supply base, rather than our own internal recruitment process.

We have taken steps to mitigate both our internal recruiting risk and that within our supply chain. For example, we currently undertake due diligence within our own recruitment process, completing identity and right to work checks. On the supplier selection and approval front, we undertake due diligence during the onboarding process of suppliers. We have actively reviewed our supplier on-boarding procedure to ensure that it is fit for purpose.

Our standard supplier contract terms and conditions include obligations on our suppliers to comply with all applicable laws, statutes and regulations (which would include the Modern Slavery Act 2015) as well as compliance with Orbia's Code of Ethics. Failure to comply with these provisions gives us the ability to terminate an agreement with that supplier. We are in the process of enhancing our procedures to also require compliance with Orbia's new Supplier Code of Conduct.

Orbia continues its implementation of EcoVadis (a well-respected supply chain sustainability management platform) throughout the company to support us in the ongoing compliance monitoring of our supply chains and to identify suppliers that may have gaps or significant risks. Ecovadis' supplier assessments cover 4 areas: Labour & Human Rights (including modern slavery), Ethics, Environment, and Sustainable Procurement.

Supplier performance in these areas is assessed, including identification of risk areas, enabling us to implement corrective action plans for high-risk suppliers. Orbia B&I adopted the use of the Ecovadis program in 2021, which is enhancing its Modern Slavery compliance program protocols. Orbia B&I will continue to expand the EcoVadis program across our suppliers and incorporate it into our Procurement processes.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to all employees with access to computers (which is all UK employees). All such employees are required to complete an online Code of Ethics training module annually during Ethics Month, which typically takes place in the spring. The importance of compliance with child labor and modern slavery norms has been covered in the June 2020, May 2021 May 2022 and May 2023 courses, and over 99.8% of eligible employees completed the course by the required deadline. Our May 2024 Code of Ethics course again underscored the importance of ensuring compliance with child labour and modern slavery legislation in our supply chain.

Our Effectiveness in Combating Slavery and Human Trafficking

Modern Slavery risk is fluid and our approach must continue to evolve to meet the risk. To ensure we are taking a programmatic approach to address this important risk, in 2022 Orbia officially appointed its Chief Compliance Officer to lead its Anti-Modern Slavery program. In 2023, Orbia staff members participated in the United Nation's Business & Human Rights Accelerator Program, which is a six-month training program focused on building effective human rights programs. In addition, this year we continue to leverage the EcoVadis tool within our supply base and to monitor our supply chain via a risk assessment process, as well as continue educate our workforce about the importance of speaking up if they see violations of our Code of Ethics, our policies and the law, including suspected violations of child labor and modern slavery laws.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Slavery and Human Trafficking statement for the financial year ending 31 December 2023. It was approved by the board on the date below.

Freek Crum, Executive Vice President and President

Orbia Building and Infrastructure

Date: 12 September 2024