Modern Slavery Act Statement 2026 Building Adhesives Limited

Modern Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and outlines the steps we have taken to prevent modern slavery and human trafficking in our business and supply chains. This statement covers the financial year ending 31st December 2026 and applies to Building Adhesives Limited. Building Adhesives Limited confirms that it is publishing this statement in accordance with its obligations under section 54 of the Modern Slavery Act 2015, where applicable, or otherwise as a statement of good practice and transparency.

Building Adhesives Limited is committed to preventing modern slavery and human trafficking occurring within any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

Organisational Structure and Operations

Building Adhesives Limited is part of the ARDEX Group and ARDEX GmbH, our parent company has its head Office in Witten, Germany.

Building Adhesives Limited is a manufacturer of high-performance flooring and tiling products for use within the building and construction sector.

Building Adhesives Limited is located on Longton Road, Trentham, Stoke-on-Trent, Staffordshire. ST4 8JB.

The majority of our supply is to the UK and EU market with some exports globally.

Nature of our Supply Chains

We procure a wide range of raw materials, goods, and services from a variety of suppliers from within the UK, Mainland Europe, China, Australia, America, South America, and Turkey.

We recognise that modern slavery risks may arise both within our own operations and within our wider supply chains, including through the use of temporary, agency or contracted labour, recruitment practices, logistics, warehousing, facilities services, raw material sourcing and overseas supply routes.

Policies Relating to Slavery and Human Trafficking

Our Supplier Code of Conduct policies reflect our commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains, and to acting ethically and with integrity in all our business activities and relationships.

We ensure that our suppliers are aware of our policies and take appropriate measures to ensure that our suppliers adhere to the same high standards.

Our policies have been developed by the ARDEX Group and incorporated in the supplier selection and approval processes at this site.

Risk Assessment

We have implemented a Supplier Code of Conduct and, as part of our ongoing focus to identify and mitigate risks within the supply chain, our ethical sourcing questionnaires include an assessment of slavery and trafficking risk. We evaluate suppliers using a risk-based approach, taking into account geographical, sector, product, labour and market factors. This helps us assess which of our own activities and supply chains may represent higher risks in respect of modern slavery or human trafficking, and where further due diligence, monitoring or supplier engagement may be required.

Higher-risk areas may include suppliers operating in countries or sectors with increased exposure to forced labour, poor labour standards, complex subcontracting arrangements, or limited visibility beyond tier-one suppliers. Where higher-risk indicators are identified, we will take proportionate steps which may include further supplier assessment, additional contractual commitments, corrective action plans, closer monitoring or escalation to senior management.

Due Diligence

To monitor and mitigate the risks of slavery and human trafficking occurring within our supply chains, we undertake the due diligence processes in relation to all new suppliers:

- **Staff Training:** Key staff are appropriately qualified and understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively operate our policies and procedures aimed at mitigating this risk.
- **Monitoring Programme:** Building Adhesives Limited continues internal monitoring of our supply chains, taking a risk-based approach based upon criteria such as geographical location, sector, supplier type and the nature of goods or services provided, to determine the level of monitoring required to ensure compliance with our policies.

Contractual Controls and Supplier Expectations

We expect suppliers, contractors and business partners to comply with all applicable laws relating to modern slavery and human trafficking, and to maintain appropriate controls within their own operations and supply chains. Where appropriate, supplier agreements may include commitments relating to ethical labour practices, compliance with our Supplier Code of Conduct, audit or information rights, corrective action requirements and the ability to terminate the relationship where serious or unresolved concerns arise.

Training and Awareness

We will provide appropriate training and awareness for employees whose roles may be relevant to identifying, preventing or responding to modern slavery risks. This may include employees involved in procurement, supplier management, human resources, recruitment, operations, management and those responsible for engaging contractors or agency labour. Training will cover the indicators of modern slavery, internal reporting routes, supplier due diligence expectations and the importance of escalating concerns promptly.

Reporting Concerns

Employees, agency workers, contractors, suppliers and other stakeholders are encouraged to report any concerns or suspicions relating to modern slavery or human trafficking at the earliest opportunity. Concerns may be raised with a line manager, the People and Culture team, a senior manager, or through any applicable whistleblowing or confidential reporting process. Building Adhesives Limited will treat concerns seriously and will not tolerate victimisation of anyone who raises a genuine concern in good faith.

Remediation and Escalation

Where a concern or potential indicator of modern slavery is identified, we will assess the matter promptly and take appropriate action. This may include investigation, engagement with the supplier or relevant third party, development of a corrective action plan, increased monitoring, escalation to senior management, suspension or termination of the business relationship where appropriate, and referral to relevant authorities or specialist support organisations where required. Any response will seek to protect and support affected individuals and avoid actions that may increase risk or harm to them.

Monitoring Effectiveness

We will monitor the effectiveness of the steps we take to prevent modern slavery and human trafficking through appropriate measures. These may include the number and percentage of suppliers completing ethical sourcing questionnaires, supplier reviews completed, high-risk suppliers assessed, staff trained, concerns reported or investigated, corrective actions completed and improvements made to supplier due diligence processes. These measures will be reviewed periodically to support continuous improvement.

Future Action

We aim to take the following further steps over the course of the next financial year:

- Continue to review and strengthen supplier compliance with the Supplier Code of Conduct.
- Further develop the supplier ethical sourcing questionnaire and supporting policy, including clearer assessment of modern slavery risk indicators.
- Evaluate and assess suppliers using a risk-based approach, with appropriate action taken to mitigate identified risks.
- Review contractual controls for higher-risk suppliers and consider strengthening modern slavery clauses, audit rights and corrective action requirements where appropriate.
- Develop and implement role-appropriate training for employees involved in procurement, supplier management, recruitment, human resources and operations.
- Review progress against measurable indicators, including supplier questionnaire completion, supplier reviews, training completion and any concerns raised or investigated.

Approval and Publication

This statement has been approved by the Board of Directors of Building Adhesives Limited and is signed on its behalf by the Managing Director.

This statement will be reviewed and updated annually to reflect the steps taken by Building Adhesives Limited to prevent modern slavery and human trafficking within its business and supply chains.

In accordance with section 54 of the Modern Slavery Act 2015, this statement will be published on the Building Adhesives Limited website and made available in a prominent and accessible location. A copy of the statement will also be made available on request.

David Hackett

Managing Director

Date: 25/08/2026