

FLAMSTEAD HOLDINGS LIMITED
(the "Organisation")

Slavery and Human Trafficking Statement for Financial Year 2018/ 2019

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps the Organisation has taken and plans to take in the future to ensure that slavery and human trafficking is not occurring within our supply chains or in any part of our business.

Respecting Human Rights issues is a key consideration throughout our Organisation and we expect our suppliers to act with integrity throughout their organisations. We have zero tolerance to slavery and human trafficking and expect all those in our supply chain to comply with these values.

Organisational Structure

This statement is published on behalf of Flamstead Holdings Limited in line with the Modern Slavery Act 2015, and references to "we", "us", "our" or the "Organisation" are to Flamstead Holdings Limited and its wholly owned subsidiaries. HL Plastics Limited, a wholly owned subsidiary of Flamstead Holdings Limited, manufactures vinyl products for the fenestration and leisure industries. In addition to HL Plastics, Flamstead Holdings also owns Avantek Machinery, which provides specialist machinery to the fenestration industry.

Flamstead Holdings has an annual turnover in fiscal 2019 of approximately £85m with a combined workforce of approximately 500, all located within the United Kingdom.

Supply Chain Overview

The Organisation's supply chain encompasses the supply of both raw materials and finished goods, primarily from the USA and Europe with a small amount of goods purchased from China.

The Organisation's primary raw materials include resin materials and compounds, steel, aluminium, hardware, machinery and accessories relating to the window industry.

Policies relating to Human Trafficking and Slavery

We are committed to reducing the risk of modern slavery and human trafficking in our supply chains and related dealings.

This Statement and our corporate policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing systems and controls that are both effective and reasonable in scope given our risk level, in order to ensure slavery and human trafficking is not taking place within our supply chain.

We have instituted an Anti-Bribery Policy, Employee Codes of Conduct, Human Rights Policy and other internal policies concerning ethical behaviours, which highlight our commitment to ensuring we continue to operate in a principled manner, with the aim that our Organisation and supply chain remain free of slavery and human trafficking. We also have extensive Corporate and local systems in place to encourage the reporting of concerns, both by our employees and by third parties, and to ensure the protection of whistle blowers.

Risk Assessment and Due Diligence

We aim to regularly assess risk related to modern slavery and human trafficking associated with our supply chain and institute supply chain diligence procedures that are reasonable and appropriate in light of our business and risk levels.

During fiscal 2019, we have issued to all of our suppliers the Code of Supplier Conduct and we have maintained an approach of assessing our global supply chain risk based upon geography, and maintain that our supply base is relatively low risk with respect to the potential for slavery and human trafficking. Based on the results of that assessment, we focus our compliance and certification efforts on those suppliers located in the highest risk countries.

The Organisation aims to build long standing relationships with all suppliers and make clear our expectations of business behaviour, including our stance with regard to modern slavery and ethical practises, to enable effective working relationships throughout our supply chain.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our Organisation, we will continue communications and training of staff members to assist in the awareness of the signs of modern slavery, and actions to take if there are any concerns.

Monitoring and Reporting

We maintain an Alert Line that allows both employees and third parties to report any violations of law or our codes of conduct. That Alert Line is monitored by a corporate compliance officer at our ultimate parent company, Quanex Building Products Corporation. All reports submitted to the Alert Line are investigated by that compliance officer.

This Statement was approved by the Board of Flamstead Holdings Limited on 19th March 2020.

Signed

A handwritten signature in black ink, appearing to read "Paul Cornett". The signature is fluid and cursive, with a large initial "P" and "C".

PAUL CORNETT
Paul Cornett
Director

Date of Statement: 19th March 2020, Date of Next Review: March 1, 2021