



## Modern Slavery Act Statement

### Introduction from Gene Murtagh, Group Chief Executive

As a global leader in the construction industry, Kingspan recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Kingspan is absolutely committed to ensuring that there is no slavery or human trafficking in any part of our business, and to imposing the same high standards on our suppliers. Our people are expected to act ethically and with integrity at all times, and to raise concerns about our supply chain should any issues arise. Our management are expect to act resolutely to ensure compliance with this policy.

### Organisation's Structure

Kingspan is a global leader in high performance insulation, building fabric, and solar integrated building envelopes. It delivers high efficiency, low cost & low carbon building solutions across a broad range of market sectors. The Group has five divisions, Insulated Panels, Insulation Boards, Environmental, Access Floors and Light & Air which operate globally and has an annual turnover of more than €3bn. To find out more about the nature of Kingspan's business go to [www.kingspan.com](http://www.kingspan.com)

### Our Supply Chain

The built environment supply chain is complex. There are often 5+ levels of suppliers between Kingspan and the source of raw materials that enter the manufacturing process. The breadth and depth of this industry make it challenging to effectively manage every aspect of the supply chain.

### Supplier Code of Conduct

Kingspan is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Suppliers must demonstrate that there is no slavery or human trafficking in any part of their business. Kingspan works with suppliers to ensure that they meet the standards of this code of conduct. However, serious violations of Kingspan's supplier code of conduct will lead to the termination of the business relationship.

### Due Diligence

As part of its efforts to monitor and reduce the risk of slavery and/or human trafficking occurring within its supply chains, Kingspan has adopted the following due diligence procedures when taking on new suppliers, and reviewing its existing suppliers:

- identify and assess the modern slavery and human trafficking risks of each new/existing supplier;
- conduct supplier assessments, with a greater degree of focus on slavery and human trafficking where general risks are identified;
- review on a regular basis all aspects of the supply chain;

- provide adequate protection for whistle-blowers.

## **Other Policies**

On an on-going basis, Kingspan operates the following policies that describe its approach to the identification of modern slavery risks, and the steps to be taken to prevent modern slavery and human trafficking in its operations.

### **A. Whistleblowing Policy**

Kingspan encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of Kingspan. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Employees, customers or others who have concerns can use the confidential helpline, Expolink on 0800 374199 or +44 1249661808.

### **B. Employee Code of Conduct**

Kingspan's code makes it clear to employees the actions and behaviour expected of them when representing the Company. Kingspan strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

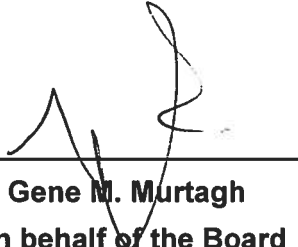
## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, Kingspan intends to provide access to training for its employees. Through the training programmes, employees are encouraged to identify and report any potential breaches of the Company's anti-slavery and human trafficking policy.

## **Further Steps**

Kingspan is committed to reviewing the effectiveness of its policies and procedures with regard to combatting slavery and human trafficking. Kingspan intends to explore how to measure and assess the management of the risks that are identified.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Kingspan's statement for the financial year ended 31 December 2016.



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**Signed by Gene M. Murtagh**  
**For and on behalf of the Board**  
**Dated 16 December 2016**