

## TENSAR COMPLIANCE POLICY FOR COUNTERING MODERN SLAVERY

### KEY POLICY PRINCIPLES FOR BUSINESS ASSOCIATES

#### **A. POLICY STATEMENT**

1. The Tensar Group Limited and its UK subsidiaries (individually and collectively “**Tensar**”) are committed to being good corporate citizens. We uphold high standards of ethics and business conduct in everything we do. We appreciate that our reputation for integrity is one of our most valuable assets. Modern Slavery, in a similar way to bribery and corruption, is a threat not only to society at large, but also to our own core values and business interests.
2. In furtherance of our efforts in this regard, Tensar will comply with and support all applicable laws which relate to countering modern slavery, forced labour and human trafficking and we will endeavour to prevent such activity from occurring in our supply lines. Applicable legislation includes the UK Modern Slavery Act 2015 and can include laws in other countries.
3. The Principles in this document apply to all Tensar businesses and employees. We also require that our Business Associates comply with these laws and Principles in order to ensure that Tensar’s supply lines are free from slavery and coerced labour of any kind.
4. Tensar will not tolerate those who seek to achieve results at the cost of violation of applicable law or these Principles, or by sacrificing Tensar’s well-founded reputation for treating people fairly and with respect and dignity.

#### **DEFINITIONS**

In these Principles the following words have the following meanings: -

“**modern slavery**” includes slavery, servitude, forced and compulsory labour and human trafficking.

“**Business Associate**” means a person, firm or company outside of Tensar who provides products or services to or for the benefit of Tensar. This potentially includes the manufacturers, dealers, licensors, licensees, contractors, consultants, advisors, agents, suppliers and others with whom Tensar does business, or with whom we seek to do business, or who seek to do business with Tensar.

“**Principles**” means the contents of this document, as such may be modified by Tensar from time-to-time and communicated to Business Associates in writing.

#### **B. KEY PRINCIPLES**

1. You must not, directly or indirectly, use or tolerate the presence of modern slavery in your business or supply lines.
2. 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.
3. However, Tensar 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.
4. You are to notify your business contact at Tensar as soon as possible if you discover any kind of modern slavery issue involving any Tensar-related business activity. You may also report the matter via our ethics hotline by calling 0808 234 2958 from the UK. The hotline report can be made anonymously if you prefer. Further guidance can also be sought from the UK Government’s telephone helpline on 0800 0121 700. The issue can and should also be reported by you online using the modern slavery independent helpline and reporting website found at <https://www.modernslaveryhelpline.org/report>.
5. You should maintain books, records and accounts which, in reasonable detail, accurately, fairly and timely record and reflect your business transactions including in relation to both your direct workforce and those contracted to work for you or on your behalf.
6. Tensar may terminate its commercial relationship with any Business Associate that is in breach of these Principles or applicable law, or is found to have been involved in modern slavery.
7. You shall comply, to the extent applicable to your Tensar-related business, with the Modern Slavery Act 2015 and any local anti-slavery laws. Also, as periodically requested by Tensar, you will be expected to certify in writing to Tensar that you have complied with such laws and with these Principles.

Thank you for your understanding and cooperation.