

# Modern Slavery Statement 2024

## Introduction

wienerberger UK & Ireland (comprising Wienerberger Ltd., Building Product Design Ltd., FloPlast Ltd., and Pipelife Ireland Solutions Ltd.) is committed to preventing modern slavery and human trafficking across all areas of our business operations and supply chains. We recognise our responsibility to take a proactive approach in addressing these issues and remain dedicated to upholding human rights in line with the Modern Slavery Act 2015. In addition, wienerberger UK & Ireland, as part of the wienerberger Group, has upheld responsible labour practices since 2001 through the publication of our Social Charter — a public commitment to comply with the recommendations of the International Labour Organization (ILO) and to adhere to the principles of the EU Charter of Fundamental Rights.

This statement sets out the steps we have taken during the financial year ending 31st December 2024 to prevent modern slavery and human trafficking in our organisation and supply chains.

## Organisational Structure

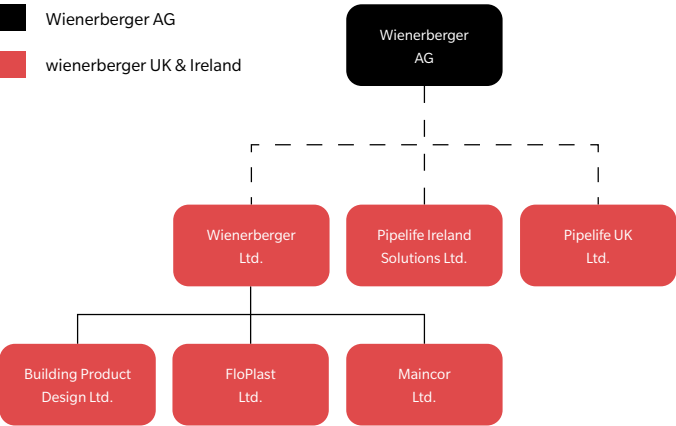
wienerberger UK & Ireland is a geographically defined division of Wienerberger AG which, since it was founded in Vienna in 1819, has become the world’s largest producer of bricks and Europe’s largest clay roof tile producer. In 2024 Wienerberger AG generated revenues of € 4.5 billion and operating EBITDA of € 750 million.

While Wienerberger AG provides strategic oversight and sets group-wide policies and standards, wienerberger UK & Ireland (led by Wienerberger Ltd.) maintains operational independence and is responsible for ensuring compliance with the UK Modern Slavery Act 2015.

The wienerberger UK & Ireland division comprises the six businesses described below:

- Wienerberger Ltd.** - Core operations focus on the manufacture of ceramic and concrete building materials - including bricks, roof tiles, and pavers. It operates 14 factories and offices, and generated revenues of £312.6m in 2023
- Building Product Design Ltd.** – Acquired in 2019, this subsidiary is a specialist provider of roofing accessories such as membranes, ventilation products, and associated fittings. It operates 3 factories and offices, and generated revenues of £31.96m in 2023.

- FloPlast Ltd.** – Acquired in 2021, FloPlast Ltd. is a manufacturer and supplier of plastic building and plumbing systems to the UK construction sector. Its production site and head office are co-located in Sittingbourne, Kent. It reported revenues of £93.2m in 2023.
- Cork Plastics Ltd.** - Acquired in 2021 and now referred to as Pipelife Ireland Solutions Ltd., it manufactures plastic products for the construction and agricultural industries in Ireland. Its office and production site are co-located in Cork. It reported revenues of €90.36m in 2023.
- Pipelife UK Ltd.** – This company was the UK distribution hub for Cork Plastics Ltd., with a warehouse in Corby. In July 2024, Pipelife UK Ltd. was officially subsumed into FloPlast Ltd., therefore references to FloPlast Ltd. throughout this statement include Pipelife UK Ltd. Revenues are not publicly disclosed.
- Maincor Ltd.** – Acquired in 2024, Maincor Ltd. specialises in plumbing solutions and underfloor heating systems. Its design and sales office is based in Lutterworth, Leicestershire. In July 2024, Maincor Ltd. was officially subsumed into FloPlast Ltd., therefore references to FloPlast Ltd. throughout this statement include Maincor Ltd. Revenues are not publicly disclosed.



In 2024, wienerberger UK and Ireland collectively employed 2,075 people across 23 factories, quarries and offices. All companies within the UK & Ireland region have to follow the same internal policies and standards, and operate with the same due diligence, training, and monitoring processes to minimise the risk of modern slavery.

## Supply Chain Structure

wienerberger UK & Ireland relies on a complex supply chain that supports both direct manufacturing and wider operational functions. These supply chains span across the UK, Ireland and some international markets. They can be grouped into the following core categories:

- **Raw materials** - including clay, sand, plastic polymers, and chemical additives. A significant proportion of raw materials are sourced domestically, either from our own quarries or through our strategic partners. However, certain specialist materials - particularly chemical additives - are sourced from overseas, including some countries with weaker labour protections which may increase the risk of exposure to modern slavery.
- **Production-related inputs** - such as moulds, industrial machinery, fuel, and packaging. These are procured through a mix of UK and EU based and international suppliers.
- **Subcontracted services** - covering logistics, maintenance, warehousing, cleaning, and the provision of agency labour. These services are essential and vary in scale depending on the business and site.

Across wienerberger UK and Ireland, most of our people are directly employed. However, agency labour remains a component of the workforce at certain sites. Wienerberger Ltd., Building Product Design Ltd., and Pipelife Ireland Solutions Ltd. engage a small number of temporary workers through reputable local agencies to address recruitment gaps. FloPlast Ltd. has historically relied more heavily on agency labour, although we are pleased to report a decision was made to increase direct employment in recent years. We recognise that the use of temporary or subcontracted labour can increase the risk of modern slavery, particularly if recruitment practices lack close oversight. To mitigate these risks, wienerberger UK & Ireland applies a consistent group-wide framework. This includes supplier due diligence, contractual commitments to ethical labour standards, and stronger internal controls over labour provider selection.

Additional risks arise from sourcing materials from countries with weaker labour protections. We routinely review opportunities to reshore selected operations to improve supply chain transparency and reduce reliance on higher-risk material markets.

This coordinated approach to procuring products and services ensures that modern slavery risks are analysed, assessed, and managed consistently across all companies within wienerberger UK & Ireland, reinforcing our commitment to ethical sourcing and responsible employment practices.

## Governance

Responsibility for managing modern slavery risks across wienerberger UK & Ireland sits jointly with the Procurement and Human Resources (HR) functions, with support from the

Sustainability department. The Procurement and HR teams are responsible for implementing and monitoring due diligence processes, supplier risk assessments and managing third-party labour providers. All businesses within the region are required to follow the same internal policies and procedures, creating a group-wide approach to ethical labour practices and compliance.

The Director of Procurement holds primary responsibility for supply chain governance, including ethical sourcing, supplier onboarding, and the integration of modern slavery checks within procurement systems and tools such as Jaggaer and EcoVadis. Collectively, the Procurement team are responsible for identifying, assessing and responding to modern slavery risk. The HR Director is responsible for ensuring fair recruitment practices and managing the risks associated with agency labour. The HR team is also responsible for deploying modern slavery training and monitoring completion rates.

This governance model ensures that modern slavery risk management is embedded at both strategic and operational levels, and progress updates are provided to the Chief Financial Officer and Chief Operating Officer. All members of the Board review and approve the Modern Slavery Statement.

## Policies and Commitments

wienerberger UK & Ireland has established a regional framework of policies and procedures to help prevent modern slavery and human trafficking across our businesses and supply chains. We are committed to applying a unified approach to modern slavery risk management across all companies within the UK & Ireland region, regardless of individual turnover or statutory obligations.

Our governance framework includes the following policies:

- **Modern Slavery Policy** – Sets out the regional approach to combatting modern slavery and describes the procedure for reporting a suspected breach of policy. This policy is based on good practice, as advised by the UK Government and modern slavery NGOs.
- **Responsible Sourcing Policy** – Holistically addresses the environmental and social aspects of our operations. We have created this policy in alignment with the requirements of the BES 6001 framework standard for responsible sourcing.
- **Supplier Code of Conduct** – Outlines the minimum standards we expect from all suppliers, including compliance with labour laws, prohibition of forced labour, and respect for workers' rights.
- **Whistleblowing Policy** – Our whistleblowing policy includes an anonymous hotline (0800 988 6818), managed by an independent third party, which is available to all employees, suppliers, and partners to raise concerns confidentially. The policy is informed by two main sources: the Public Interest Disclosure Act and the global whistleblowing initiative SeeHearSpeakUp.

- **Employee Code of Conduct** – This policy brings together a selection of individual policies and sets out the expectations of our parent company for all its businesses and employees. It is based on Wienerberger's core values: trust, respect, passion, and creativity.

These policies are communicated across the region and apply to all individuals working for wienerberger UK & Ireland. All policies are reviewed annually and updated when necessary. Responsibility for the implementation of these policies is shared between HR and Procurement teams, who work to embed modern slavery clauses into contracts and strengthen internal oversight. This ensures consistent application across all businesses within the UK & Ireland region.

## Risk Assessment and Due Diligence

wienerberger UK & Ireland assesses and manages modern slavery risks through a five-part due diligence process. This framework includes: (1) risk screening of suppliers using a Supplier Relationship Management (SRM) tool; (2) EcoVadis platform rating; (3) signing the Supplier Code of Conduct; (4) desktop audits; and (5) on-site audits, for higher-risk suppliers. While all businesses within the UK & Ireland region follow this process, they are at different stages of implementation and may not have processed the same volume of suppliers as Wienerberger Ltd.

Risk assessments are conducted annually or when new suppliers are onboarded. We use a combination of internal checks and external tools, including Walk Free's Global Slavery Index risk map which helps us identify country-level vulnerabilities, to assess the potential for modern slavery within a supplier's operations. We also consider industry, workforce profile, product type, and transparency of labour practices.

Although most of our strategic suppliers are based in the UK & EU, there is a small percentage that are based overseas (e.g. China) where these risks are typically present. This is due to these countries having weaker legal protections, informal labour or migrant-heavy labour and there is limited oversight or visibility.

Where our assessments indicate high priority modern slavery risks (as defined in the UK Government's Transparency in Supply Chains guidance) we take additional steps. Where possible, we complement desktop reviews with in-person supplier visits. In one such instance, a member of our Procurement team visited a supplier in South Africa used by Building Product Design Ltd. This allowed for a more detailed assessment of working conditions, hiring practices, and management systems, further strengthening our confidence in the supplier's ethical practices.

As part of our supplier risk assessment process:

- All SAP-registered suppliers are screened monthly against international sanctions lists published by the United Nations and the Office of Foreign Asset Control (OFAC).

- Our Jaggaer Supplier Relationship Management (SRM) platform captures performance ratings, ESG compliance, and corrective actions. This informs procurement decisions and helps ensure alignment with our ethical standards.
- We use EcoVadis and encourage suppliers to complete an ESG assessment or provide an equivalent rating. Suppliers scoring below acceptable thresholds are contacted by the Procurement team to discuss improvement plans.
- Where a formal rating is not feasible, a Desk-Based Audit may be undertaken. For suppliers considered high-risk, an On-Site Audit is required. These audits are conducted by trained auditors and reviewed by the Director of Procurement.

Alongside supplier due diligence, robust internal controls are applied to our own recruitment practices across wienerberger UK & Ireland. These include verifying candidates' right to work, skills and qualifications, and ensuring equal pay for temporary and permanent staff. Wienerberger Ltd. also conducts basic DBS checks for Board-level appointments and monitors payroll data for anomalies such as duplicate bank details.

Wienerberger Ltd.'s brick, paver, and roof tile operations have been independently certified under the BES 6001 Responsible Sourcing Standard since 2009. In 2024, we achieved an 'Excellent' rating for UK-manufactured products. We also encourage raw material suppliers to pursue BES 6001 certification to promote ethical and traceable sourcing. At Group level, Wienerberger AG undergoes an annual EcoVadis assessment and currently holds a Gold rating.

## Training and Awareness

Training and awareness on modern slavery is an integral part of our risk management approach across the region. Currently, FloPlast Ltd., Building Product Design Ltd. and Pipelife Ltd. are in the process of onboarding modern slavery training, while Wienerberger Ltd. uses toolbox talks, visual awareness campaigns (such as posters in canteens) and take-away cards following briefings.

Our training focuses on recognising the signs of modern slavery and understanding how to report concerns, whether through our internal whistleblowing hotline or external channels such as the Modern Slavery Helpline and the Gangmasters and Labour Abuse Authority. The training materials have largely been developed in-house through collaboration between our Sustainability, Health & Safety, and HR teams. A key component of the current training is a Stronger Together video that has been bookended to provide specific context for our businesses and region.

To further strengthen our approach, Wienerberger Ltd. is developing an e-learning module for office-based employees, which will complement the ongoing use of toolbox talks for production-based staff. The e-learning module will be rolled out across the region, ensuring that our approach to training is unified and that all staff are receiving the same level of training.

## Effectiveness and KPIs

Each year Wienerberger Ltd., Building Product Design Ltd., Pipelife Ireland Solutions Ltd., and FloPlast Ltd. report upon progress using three key performance indicators:

### 1. Number of whistle-blowing cases raised

In 2024, zero modern slavery-related whistle-blowing cases were raised at Wienerberger Ltd., Building Product Design Ltd., Pipelife Ireland Solutions Ltd., and FloPlast Ltd.

### 2. Number of modern slavery cases identified

Zero instances of modern slavery were identified in 2024. We recognise, however, that deeper risk assessments and specialist staff training are essential to strengthen our confidence in these findings. To support this, we are developing a more robust risk assessment procedure as part of our ongoing improvement efforts.

### 3. Percentage of employees trained on modern slavery risks and prevention

A group wide solution to modern slavery training is being developed, in collaboration with our HR function. However, at the current time, each business has their own approach to training. This consists of toolbox talks, posters and take-away cards.

## Future Actions

Since our last modern slavery statement, we have made meaningful progress in strengthening our governance and approach to tackling modern slavery. All businesses within the region are now aligned under a single procurement procedure, ensuring a consistent approach to supplier due diligence. As part of this update, we have included ESG-related questions, including those focused on modern slavery, within our tendering process to help identify and assess risks at an earlier stage. These changes reflect our ongoing commitment to continuous improvement and greater accountability across our supply chains.

Looking ahead, wienerberger UK & Ireland remains committed to further strengthening our approach to prevent modern slavery. Our planned actions include:

- Rolling out modern slavery training for colleagues and aligning training across all businesses.
- Increasing supplier engagement.
- Continuing to review and update our internal policies and procedures in line with emerging best practice and regulatory developments.
- Beginning a more detailed internal mapping of our supply chain to improve visibility of higher-risk suppliers and support more effective risk-based due diligence.
- Enhancing supplier risk assessments and expanding the use of ESG data within our Supplier Relationship Management (SRM) tool.

These actions form part of our broader commitment to continuous improvement and responsible business practices.

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### Signed on behalf of the Board of Directors



**Keith Barker**  
Chief Operating Officer UK & Ireland  
Wienerberger Ltd.