

Modern Slavery Statement

Modern Slavery Act 2015 Statement for the Financial Year Ending 30th June 2022

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the InstaGroup's slavery and human trafficking statement for the financial year ending 30th June 2022.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour, and the InstaGroup has a zero-tolerance approach to any form of modern slavery. It is a priority for InstaGroup to ensure that we operate and trade ethically, source responsibly and continuously work to prevent modern slavery and human trafficking throughout our organisation and in our supply chains. To that end, we've implemented and are enforcing systems and controls aimed at ensuring modern slavery is not taking place anywhere in our business or in our supply chains. InstaGroup Limited's definition of slavery and human trafficking is aligned to section 54 (12) of the Modern Slavery Act 2015.

This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chains, including a thorough review of our internal policies, the policies of our supply chain and our recruitment policies.

This statement is available publicly, and is published on our website [InstaGroup – Making buildings fit for the future](#).

Our Business

Our vision is to Build Brighter Future, Together, playing a leading role in the UK's transition to net zero, embracing sustainable living and serving our markets passionately to make a lasting difference through helping to develop warm and efficient buildings fit for the future. Our wide range of services include market leading insulation and flooring systems, installation of energy efficiency improvements to domestic and commercial buildings through our in-house expert teams and network members and delivering a start to end service for energy efficiency grant funding schemes to the UK market.

Our ultimate parent company is Insta (International) Limited. Insta (International) Limited has its head office in the UK. The Group has over 76 employees and operates across the UK and other global markets. We have a global annual turnover of £41 million.

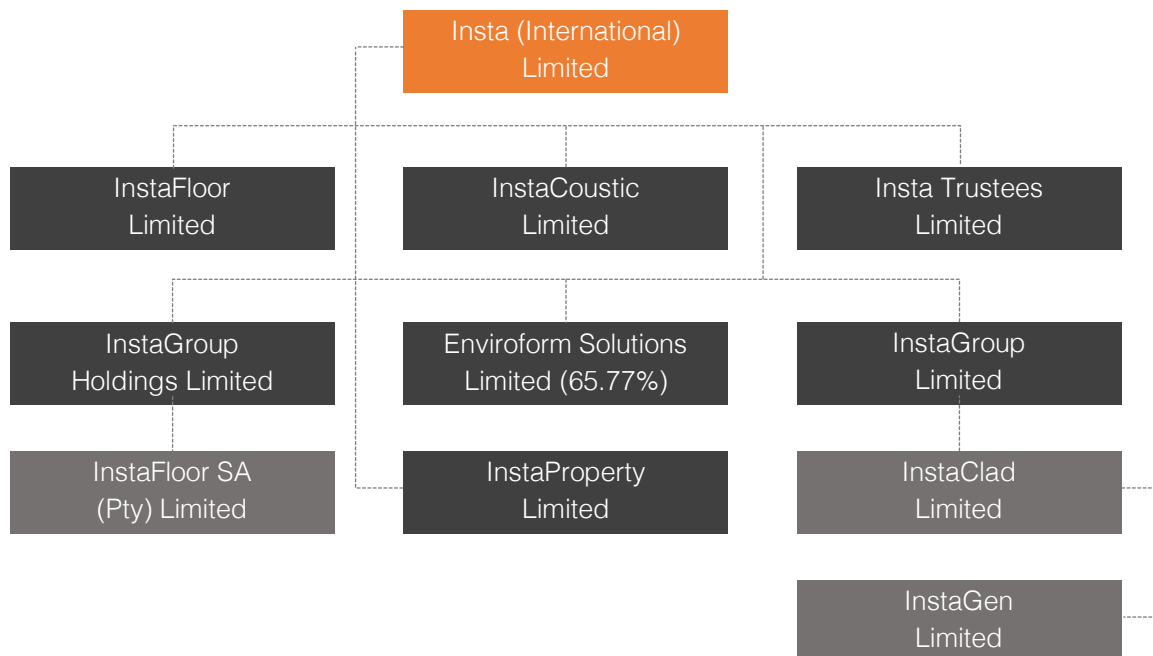
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Organisation's structure

We operate our business activities through two operating entities, InstaGroup Limited and Insta Coustic Limited. Our business operations are organised into three main business areas:

1. **Energy services** offering a start to end service for energy efficiency grant funding schemes to the UK market including specialist technical support and a specialist compliance Retrofit Coordination Service to navigate the compliance regime in an efficient and effective way.
2. **Contracting services** for main contractors, social housing associations, local councils, the private commercial and domestic sector across a wide range of services and installations including cavity wall insulation, loft insulation, solid wall insulation, cold bridging solutions, dry flooring systems including under floor heating, and specialist flooring and sports flooring.
3. **Material sales of insulation**, other energy efficiency products, solutions and systems to our network of installers and the wider retro fit and new build market.

The InstaGroup of companies is as described below:



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Our supply chains

Our supply chain consists of global and local manufacturers, partners and subcontractors including leading insulation and energy efficiency manufacturers in the UK & Europe, a network of trusted UK installers who work in partnership with the InstaGroup, flooring manufacturers primarily in Malaysia and South Africa and other energy efficiency related suppliers and professional and support services to the business.

We recognise the value in developing long term partnerships within our supply chain, working with reliable and reputable firms that share our values and enable the InstaGroup to deliver quality, innovative products and services to the market. To work with us, suppliers and subcontractors must demonstrate that they are viable, adhere to our quality and standards, health and safety responsibilities and operate their businesses in a sustainable, fair and ethical way.

Our policies on slavery and human trafficking

We have policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business and to ensure we act ethically and with integrity and observe fundamental aspects of human rights in all our business relationships. We continuously review and update all our policies, and reference to best practice where possible.

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains or in any part of our business.

We also have developed the following policies in place relevant to modern slavery, which we continuously review and update:

- Whistleblowing
- Occupational Health and Safety
- Anti-Bribery and Corruption
- Recruitment policy
- Employee Handbook
- Pay/National Living Wage

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and manage modern slavery risk, we continuously review our existing supply chain and identify any high-risk suppliers and/or jurisdictions. We perform a detailed assessment of any new suppliers for adherence to our high-quality standards and our commitment to a zero tolerance towards Modern Slavery and Human Trafficking.

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Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, and adherence to our quality standards we provide training to our staff through a dedicated and compulsory programme. We continuously monitor compliance with the training programme, which includes a specific module to make all staff aware of the Modern Slavery Act 2015 and inform them of the appropriate action to take if they suspect a case of slavery or human trafficking.

Our effectiveness in combating slavery and human trafficking

InstaGroup received zero reports from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Modern slavery and trafficking policy that reflects our commitment to respecting human rights everywhere we operate and to ensuring there is no modern slavery or human trafficking in any aspect of our business
- Responsible sourcing / procurement policy
- Supplier Code, to help us work only with companies that embrace our core values and share our zero-tolerance approach to modern slavery
- Review our contractual commitments in supplier contracts that no form of modern slavery is used anywhere in the supplier's business or in its supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30th June 2022. It was approved by the board on 20th March 2023.

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David Robson
Chief Executive Officer
InstaGroup
Date: 20th March 2023