



**UK Modern Slavery Act - Scapa Group plc annual Disclosure
October 2017**

Scapa Group plc ("Scapa") is a manufacturer and supplier of a variety of adhesive and bonded products through its worldwide affiliate companies. Scapa has a complex global supply chain serving both industrial and healthcare business units.

Scapa has invested time and resources in a project we called "S.P.I.R.E." (Supplier Performance Improvement & Requirements Evaluation) which will reinforce and supplement Scapa's existing procedures and best practice methods of supplier evaluation. The rollout of S.P.I.R.E. continues across our existing global supplier base and all new suppliers are now required to participate in S.P.I.R.E. The global procurement teams have adopted a consistent, robust, documented and interactive supplier evaluation, selection and ongoing assessment approach which includes detailed due diligence and supplier certification in respect of many compliance issues including slavery and human trafficking. Subsequent disclosure statements will include an update of the S.P.I.R.E project and the effect of its use throughout the business.

The UK Modern Slavery Act requires Scapa to disclose the steps it has taken to ensure that slavery and human trafficking are not taking place in the UK business or the supply chain relating to goods which are sold in the UK. However, Scapa has decided to extend this requirement to the global supply chain as Scapa is committed to upholding human and labour rights, ensuring that every worker has safe and fair working conditions and that there is 'zero tolerance' for instances of human trafficking and slavery throughout the business.

This is Scapa's disclosure in accordance with the UK Modern Slavery Act 2015 and incorporates requirements under the California Transparency in Supply Chain Act 2010 (the "Acts").

Verification and Audit

1. Scapa continuously assesses the risk of non-compliance with the Acts within the direct supply chain.
2. Scapa's procurement team evaluates current suppliers with regard to performance and compliance in line with the Scapa Supply Chain Corporate Social Responsibility Statement. We do not use third parties for evaluation. The Scapa Supply Chain Corporate Social Responsibility Statement sets out basic principles of conduct for suppliers doing business with Scapa including a requirement for suppliers (themselves and through their own supply chain) to comply with laws relating to forced labour, human trafficking and slavery.
3. Prior to partnering with any suppliers we may conduct an initial screening process which may include a pre-arranged visit. The decision to undertake the initial screening is based on spend and sustainability risk (taking into account modern slavery and human trafficking risks, geographic location, workforce profile, and manufacturing processes).
4. We consider the overall risk of non-compliance by Scapa is low and therefore we do not systematically audit our suppliers for compliance. If we suspect, or become aware through credible information, that a supplier may be non-compliant we will conduct a thorough investigation. Non-compliance may result in termination of such business relationships.

Certification

5. We do not require our direct suppliers to certify that they comply with anti-slavery and human trafficking laws in the country or countries in which they do business.

Internal Accountability and Training

6. Training on the content and application of the Acts is provided to all procurement employees. This also raises awareness of the Scapa Corporate Social Responsibility Policy and how to spot warning signs of potential human rights violations.
7. We undertake all reasonable and practicable steps to ensure the prevention of slavery and human trafficking within our own sites through comprehensive recruitment processes and the Scapa Code of Conduct which sets out our policy on modern slavery. All members of staff are provided with training on the contents of the Code of Conduct.

This statement was adopted by the Board of Directors of Scapa Group plc

Signed on behalf of the Board by Larry Pentz – Chairman

Date: 15 November 2017

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This statement was adopted by the Board of Directors of Scapa Group plc on 28 October 2016

Signed on behalf of the Board by James Wallace – Chairman

James Wallace

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