

Scapa Group plc - Annual Disclosure -UK Modern Slavery Act and the California Transparency in Supply Chain Act 2010

Anti-Slavery and Human Trafficking Statement 2019

Scapa Group plc, through its subsidiary companies (including Scapa UK Limited, Systagenix Wound Management Manufacturing Limited and Scapa Tapes North America LLC) (“Scapa”) is a global manufacturer and supplier of a variety of adhesive and bonded products Scapa is organised into two business units serving the Healthcare and Industrial markets, primarily in Europe, North America and India.

We are committed to improving practices to combat slavery and human trafficking. As part of this, Scapa has invested time and resources in a programme called “S.P.I.R.E.” (Supplier Performance Improvement & Requirements Evaluation) which will reinforce and supplement Scapa’s existing Corporate Social Responsibility policy and procedures and best practice methods of supplier evaluation. This encompasses a process to identify and assess potential risk areas in our supply chain, to mitigate the risk of slavery and human trafficking occurring in our supply chain, together with the ability to monitor risk areas and to protect whistleblowers.

During 2018, we continued to roll out S.P.I.R.E. across our existing global supplier base with all new suppliers participating 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 anti-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.

The following disclosures are made pursuant to 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. Such risk assessment applies to the vendor base of any companies acquired and forming part of the Scapa Group with a view to driving through the use of “S.P.I.R.E.”.
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

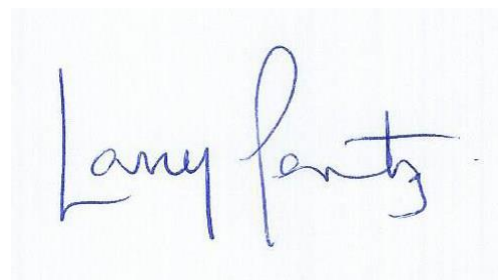
5. We do not require our direct suppliers to certify that they comply with anti-slavery and human trafficking laws in the country or countries in which they do business.

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 employees are required to undertake annual training on the Scapa Code of Conduct to ensure knowledge and awareness is maintained to a satisfactory level.

This statement was made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's anti-slavery and human trafficking statement

For financial year ending 31 March 2019

A handwritten signature in blue ink that reads "Larry Pentz". The signature is written in a cursive style with a large initial 'L' and 'P'.

**Signed on behalf of the Board by Larry Pentz – Chairman
Scapa Group plc**