

# MODERN SLAVERY TRANSPARENCY STATEMENT

2020



# MODERN SLAVERY TRANSPARENCY STATEMENT - DEC 2020

Aggregate Industries UK Limited is committed to operating our business fairly and ethically and we reiterate our commitment to the prevention of modern slavery and human trafficking in our business and our supply chain. This is our annual transparency statement for 2020 as required under section 54 of the Modern Slavery Act 2015. Our financial year ends on 31st December. We are publishing this statement now to help ensure that we fully reflect the changes to our activities resulting from the COVID-19 pandemic.

This statement has been reviewed and approved by our Chief Executive Officer on 15th December 2020.

## Who we are

As part of the worldwide LafargeHolcim group of companies, Aggregate Industries is committed to acting fairly, ethically and with respect. This statement is made by Aggregate Industries UK Limited and on behalf of all our subsidiary and affiliated companies.

As a leading supplier and contractor within the construction and infrastructure industries, we operate at over 300 locations with almost 3,700 employees. We produce, manufacture and supply a wide range of construction materials and solutions.

Our supply chain consists of around 4,000 suppliers. The majority of our suppliers are UK based, however we also purchase a small range of materials and services from Europe, America and Asia.

## Our policies

All of our policies are underpinned by our Code of Business Conduct which is published on our website. In addition to the Code, we publish a range of policies covering activities such as Recruitment and Procurement as well as on specific topics such as the procurement of natural stone. These policies are supplemented by guidance on activities including the prevention of illegal working.

In particular, our Whistleblowing Policy states that if employees suspect that compulsory labour or related activities may be taking place anywhere in our business or supply chain they are encouraged to report it immediately.

We recognise the importance of working with our supply chain. Our expectations of our suppliers are set in our updated Code of Business Conduct for Suppliers. We are committed to continue providing our partners with the help and support they need to succeed.



## Our due diligence

Our Modern Slavery Working Group continues to meet on a regular basis to share best practice and support our colleagues across the business in raising awareness and tackling modern slavery.

We continue to monitor and assess our supply chain partners through various methods including Avetta supply chain database, our pricing and tendering exercises, contractual obligations and ongoing engagement through supplier days and forums. These relationships are reflected in our maintenance of our BES 6001 (Responsible Sourcing in Construction Products) accreditation.

## Training and supporting our colleagues

As a founding partner of the Supply Chain Sustainability School we collaborate with other leading businesses within our sector to share best practices and provide guidance to school members, on issues such as modern slavery, fairness, inclusion and respect and supply chain mapping.



## OUR RISKS AND MITIGATION MEASURES

Within our business, we consider that recruitment, and in particular, the supply of temporary labour, remains the area in which the greatest hazards occur in relation to modern slavery.

The greatest hazards arising from our supply chain are considered to include the supply of labour, our logistics and contracting operations. Increased hazards are also associated with the procurement of items or services outside of the EU or where our suppliers themselves have extensive supply chains.

### OUR DUE DILIGENCE

To help mitigate these risks, we have implemented a number of measures.

Within our business:	Within our supply chain:
<ul style="list-style-type: none"> <li>▶ <b>Labour supply</b> Agency Labour is now sourced through a single supplier allowing us to apply stricter governance and maintain consistently high standards across our organisation.</li> <li>▶ <b>Payment processes</b> Checks are in place on duplicate bank accounts to help ensure no suspect activity</li> <li>▶ <b>Integrity line</b> A secure incident reporting system administered by an independent third party allowing employees to report any potential breach of our Code of Business Conduct</li> <li>▶ <b>Human Rights risk assessment</b> We assess present and potential human rights impacts within the business and our supply chain. The plan allows us to identify and mitigate issues more effectively.</li> </ul>	<ul style="list-style-type: none"> <li>▶ <b>Supply chain risk assessment</b> We risk assess our supply chain based on the types of goods or services provided, location and supply criticality</li> <li>▶ <b>Avetta</b> We require all our high risk suppliers to undergo assessment on the Avetta platform. Suppliers are required to provide documentary evidence of their compliance in the following areas: human rights, forced labour, child labour, working conditions and freedom of association</li> <li>▶ <b>Earthworm Foundation</b> (Formerly 'The Forestry Trust') Responsible Stone Programme - used with our natural stone suppliers in India and China</li> <li>▶ <b>Auditing of high risk suppliers</b></li> <li>▶ <b>Revised terms and conditions</b></li> <li>▶ <b>Supply chain mapping</b> As part of the Supply Chain Sustainability School's special interest group we contributed to guidance for conducting supply chain mapping within the industry and mapped one for a hi-vis vest with our own supplier. This methodology is now being used on current projects and supply chains to gain transparency and further understanding of risks</li> </ul>

### DEVELOPMENT, EDUCATION AND AWARENESS

Within our business:	Within our supply chain:
<ul style="list-style-type: none"> <li>▶ <b>E-learning training modules</b> All managers with recruitment responsibilities have been invited to undertake training</li> <li>▶ <b>Awareness campaign</b> Encouragement to use Supply Chain Sustainability School resources and events, internal articles and bulletin posts, posters and videos</li> <li>▶ <b>Construction protocol</b> We are a signatory to the Gangmasters and Labour Abuse Authority's protocol, committing us to raise awareness within supply chains to help prevent and protect workers from exploitation and take necessary steps to help ensure that exploitation of workers is recognised and addressed with appropriate safeguards</li> </ul>	<ul style="list-style-type: none"> <li>▶ <b>Action plans</b> Where non-compliances are found through the Avetta assessment we work with those suppliers to become compliant by issuing action plans and providing guidance</li> <li>▶ <b>Awareness campaign</b> Encouragement to become members of the Supply Chain Sustainability School, article in our haulier newsletter and posters around sites</li> <li>▶ <b>Supplier day</b> We host 'People &amp; Communities' supplier days that focus on education and sharing of best practice for our Modern Slavery, Drug &amp; Alcohol and Fair and Just policies</li> </ul>

## OUR CONTINUAL IMPROVEMENT

2020 TARGETS	
▶ Continue with awareness campaign using posters, magazine articles, e-learning and toolbox talks	<b>ACHIEVED</b>
▶ Continue due diligence and development programme using Avetta, TFT, Supply Chain Sustainability School, audit toolbox talks, and supplier days	<b>ACHIEVED</b>
▶ Roll out due diligence, awareness and policies to newly acquired businesses	<b>ACHIEVED</b>
▶ Working with selected suppliers to help improve quality and consistency of employment policies and response to Modern Slavery issues	<b>ONGOING</b>
▶ Develop Modern Slavery Toolkit for use in our businesses to help increase effectiveness of our response to Modern Slavery challenges and make available to supply chain	<b>ONGOING</b>

2020 ACHIEVEMENTS	
▶ We have engaged our team of Mental Health First Aiders	We understand that unfair working conditions can be a significant cause of stress and mental ill health. We have therefore raised awareness with our colleagues who are well placed to identify such signifiers
▶ Modern Slavery Group has been expanded	The Group now includes representatives from a wider cross section of our business better enabling us to identify further opportunities for engagement

2021 TARGETS	
▶ Consider alternatives to our supplier days to help continue our engagement with suppliers, encouraging best practice and sharing relevant experience	Covid related restrictions have made it harder to hold in-person meetings in 2020. We intend to look for alternative methods to continue our engagement with our supply chain and encourage awareness of Modern Slavery
▶ Continue development of Supplier Toolkit and distribute to representative suppliers and seek feedback	Our intention is to produce materials and resources to share with our partners, assisting them in creating awareness and establishing good practice
▶ Revise our Natural Stone Policy to increase the emphasis on Modern Slavery	Some of our natural stone products are sourced from outside the EU. We aim to update our Natural Stone Policy to build on our Supplier Code of Conduct and more fully capture the procedures we already have in place, clearly setting out our expectations of suppliers

By implementing our policies and working together with our suppliers we aim to demonstrate that we operate our business ethically, responsibly and sustainably. This Statement has been reviewed and approved by our Board.



**Guy Edwards**  
**Chief Executive Officer**  
**December 2020**

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