

MODERN SLAVERY TRANSPARENCY STATEMENT

APRIL 2025



MODERN SLAVERY TRANSPARENCY STATEMENT

Holcim 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 2024 as required under section 54 of the Modern Slavery Act 2015. Our financial year ends on 31 December and we publish the statement now to reflect the steps we have taken to protect our workforce over the last year. This statement has been reviewed and approved by our Chief Executive Officer, Lee Sleight on 15th April 2025.

WHO WE ARE

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

As a leading supplier of sustainable building solutions, and a contractor within the construction and infrastructure industries, we operate at over 200 locations in the UK with nearly 4,000 employees. We produce, manufacture and supply a wide range of products and materials, including pavement solutions. This includes aggregates, cement, readymix concrete, asphalt, precast concrete products, and building products. We also have a contracting division which delivers projects and contracts for local, regional and national customers.

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 Group's Code of Business Conduct which was updated and reissued in 2021. The Code is available on our website. In addition to the Code, we operate within a range of internal and external policies covering activities such as Recruitment and Procurement as well as on specific topics such as the way we manage the relationship with our contractors workforce (workers in the value chain: third-party service providers and sub-contracted personnel), and the procurement of natural stone. These policies are supplemented by guidance on activities including the prevention of illegal working.

In particular, our Speak up and Investigations Directive 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 via the Integrity Line.

We recognise the importance of working with our supply chain. Our expectations of our suppliers are set out 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 at least bi-annually 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 through 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

AREAS OF RISK

Our internal risks

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.



Our supply chain risks

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



Labour Supply

Agency Labour is now sourced through a single supplier allowing us to apply stricter governance and maintain consistently high standards across our organisation.



Supply chain risk assessment

We risk assess our supply chain based on the types of goods or services provided, location and supply criticality.



Payment processes

Checks are in place on duplicate bank accounts to help ensure no suspect activity.



Avetta

We require all our health and safety 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



Foreign Entities

Sanction checks are undertaken on entities registered outside of the UK and Ireland.



SGS

Used to provide external auditing of our natural stone suppliers from India.



Integrity Line

A secure incident reporting system administered by an independent third party allowing employees to report any potential breach of our Code of Business Conduct.



Auditing of high risk suppliers

This is done by using tools such as Avetta and auditing of our franchise haulier business through both FORS (or equivalent) audits.



Onboarding Documentation

This documentation was revised and improved during 2021.



Revised terms and conditions

We ensure that our terms and conditions are reviewed and fit for purpose.



Human Rights risk assessment

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. The latest assessment was completed in December 2024.



Supply chain mapping

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 the supply chain for one of our own suppliers products. This methodology is now being used on current projects and supply chains to gain transparency and further understanding of risks.



E-learning training modules

All managers with recruitment responsibilities have training on Modern Slavery available to them.



Action plans

Where non-compliances are found through the Avetta assessment we work with those suppliers to become compliant by issuing action plans and providing guidance.



Construction Protocol

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.



Awareness campaign

Sharing related information, and our latest Modern Slavery Transparency Statement via a dedicated Haulier website and portal.



Supplier day

We host 'People & Communities' supplier days that focus on education and sharing of best practice for our Modern Slavery, Drug & Alcohol, and Fair and Just policies.

OUR CONTINUAL IMPROVEMENT



ACTIVITIES IN 2024		
Audit fifty AIUK sites a year to review compliance with guidelines and Modern Slavery Statement'	50 sites took part in the Modern Slavery Assessment, allowing us to share Modern Slavery Toolbox Talks to a wide audience	
Dedicated Modern Slavery page on the AIUK website to help raise awareness both internally and externally	The link to the dedicated Modern Slavery pages is accessible from every page of the website	
As part of our commitment to raising awareness externally promote and develop our own campaign linked to #knowmorein2024	Utilised social media to support our Modern Slavery ambitions and raise the profile of the work we've done to date	
Produce a sourcing map and list of countries AIUK sources goods and services from.	Successfully completed with the development of a valuable tool within the company which breaks down, by division, where we secure goods and services from.	
OUR 2025 AMBITIONS		
Complete a company wide Modern Slavery Health Check to include focus areas on: <ul style="list-style-type: none"> • Structure • Policies • Due Diligence • Risk Assessments • Training • Whistle-blowing 		
Support SMEs, especially in our supply chain with a Modern Slavery Toolkit - including key contacts, a template toolbox talk and potential audit questions		
Produce a case study on the integrity of our overseas supply chain		
Registering with the Modern Slavery Assessment Tool (MSAT) which demonstrates how we manage Modern Slavery in a transparent way when we bid and tender for work		

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.

Lee Sleight
 CEO, Holcim UK
 15 April 2025

