

MODERN SLAVERY TRANSPARENCY STATEMENT

November 2026

HOLCIM

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 2025 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 Holcim UK's Board of Directors November 2026.

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, 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 over 3,500 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 Ethics which 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 Ethics 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 third party supplier risk management systems, 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.





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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

The majority of our agency Labour is 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.

THIRD PARTY SUPPLIER RISK MANAGEMENT SYSTEMS

We require all our health and safety high risk suppliers to undergo assessment through our supplier risk management systems. 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..

REVISED TERMS AND CONDITIONS

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

INTEGRITY LINE

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

SUPPLY CHAIN MAPPING

As part of the Supply Chain Sustainability School we contributed to guidance for conducting supply chain mapping within the industry.

ONBOARDING DOCUMENTATION

New vendors must complete pre-qualification questionnaires which includes how they mitigate the risk of Modern Slavery.

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 2025.

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 third party supplier risk management systems we work with those suppliers to become compliant by issuing action plans and providing guidance.

AWARENESS CAMPAIGN

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

SUPPLIER DAY

We host supplier events 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 2025	
Complete a company wide Modern Slavery Health Check to include focus areas on: • Structure • Policies • Due Diligence • Risk Assessments • Training • Whistle-blowing	Review complete.
Support SMEs, especially in our supply chain with a Modern Slavery Toolkit - including key contacts, a template toolbox talk and potential audit questions.	Modern Slavery specifically covered in SME supplier audits and guidance given. Training material also remains available to our hauliers.
Produce a case study on the integrity of our overseas supply chain.	Ongoing and to be completed in 2026.
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.	Registration complete and full assessment to be completed in 2026.

OUR 2026 AMBITIONS
Deliver in-person modern slavery training to colleagues that would benefit most from increased awareness.
Review and where appropriate expand supplier onboarding questions to include Modern Slavery questions.
Review induction material for new colleagues, ensuring that modern slavery is sufficiently covered.
Complete Modern Slavery Assessment Tool (MSAT), demonstrating 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.



Adham El Sharkawy
CEO, Holcim UK
November 2026

Phillip Norah

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Director, Holcim UK
November 2026

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