

Slavery and Human Trafficking Transparency Statement (1st April 2015- 31st March 2016)

Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of *'slavery, servitude and forced or compulsory labour'* and *'human trafficking'*. It has been described by the Home Secretary as a *'heinous crime that affects communities and individuals across the globe.'*

We at Creagh Concrete Products wholeheartedly agree with this statement and are committed to ensuring that appropriate and co-ordinated action is taken throughout our business to ensure that both ourselves and members of our supply chain are alert to these risks and are not a party to these unethical practices.

Organisation's structure

Creagh Concrete Products Limited ('the Company') manufactures and supplies a wide range of concrete products for a diverse range of market sectors throughout Ireland and the UK. The company operates from its Head Office in Toomebridge, County Antrim with bases in Hoveringham and Edinburgh.

Creagh Concrete has a number of specialist divisions working with each sector of the construction industry. The Company's core product range is precast and prestressed flooring with an extensive range of flooring systems designed for commercial or residential applications.

Supply chains

Our supply chains primarily involve the sourcing of; raw materials for the manufacturing of our products, transport to haul our products to site and sub-contracted labour to assist in the installation of our products onsite. We predominately source our goods and services from UK based Companies however we do also source from other Countries who are located with the European Union. We endeavour to build long standing relationships with our Supply chain members, however all arrangements are regularly reviewed.

Policy in relation to slavery and human trafficking

We have a zero tolerance policy to slavery and human trafficking and expect all those in our supply chain to also have zero tolerance policy. The Company is committed to acting ethically in all areas of our business and to implement effective control measure to ensure that such unethical practices are not happening in our supply chain.

Due Diligence process

External procedures (supply chain members):-

- We carry out a pre-qualification and review process for our Sub-contractors
- Where possible we build and maintain longstanding relationships with local suppliers who are clear on our Companies ethics
- For suppliers who are based outside the UK, our point of contact is preferably a UK company or branch. We expect these Companies to have an Anti-Slavery and Human Trafficking Policy and we have requested same

Internal procedures

- We have a Whistleblowing Policy in place which encourages the reporting of concerns and protection for the whistle-blower
- We undertake an employee verification procedure to check the eligibility of employees to work in the UK

- Our Health, Safety and Environmental officers carry out regular audits on our work places

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we aim to develop training for our staff.

Policies

We have in place policies and practices which set out how as an organisation we mitigate and manage the risk of modern slavery in our supply chains. These Policies clearly demonstrate a commitment to the issue.

- Whistleblowing Policy
- Bribery and Corruption Policy
- Employee Verification/entitlement to Work in the UK Policy
- Responsible Sourcing and Sustainability Policy
- Recruitment and Selection Policy

Effectiveness and KPIs

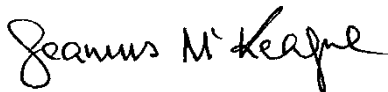
We intend to use the following Key Performance Indicators (KPIs) to measure our effectiveness at ensuring that slavery and human trafficking is not present in The Company or our supply chains.

- Building upon the number of staff we train about modern slavery issues;
- Building upon the number of suppliers we will contact to seek information about their policies and procedures

Compliance

The Company Secretary along with the Business Improvement Representative, HR Director and the Health, Safety and Environmental Director are responsible for monitoring compliance with our Policy on Human Slavery and ensuring efforts are made to investigate and remediate the risk of modern slavery in the business and/or supply chains, and ensuring that basic labour standards are met.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our Company's Slavery and Human Trafficking statement for the Financial year 1st April 2015 to 31st March 2016.



Managing Director

Creagh Concrete Products Ltd

REV 1 – March 2016