

Modern Slavery and Human Trafficking Statement

Issue No.	Date	Amendments
Issue 1	March 2017	<ul style="list-style-type: none"> Initial issue (non-mandatory due to turnover criteria)
Issue 2	February 2019	<ul style="list-style-type: none"> Policy, statement and procedures developed following increase in turnover.

Modern Slavery and Human Trafficking Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015. It sets out Concrete Repairs Limited's (CRL) actions to understand potential modern slavery risks related to its business and to put in place steps aimed at minimising this risk.

This is the initial mandatory statement issued by CRL and relates to business dealings during the financial year 01 July 2017 to 30 June 2018. This statement is an update of the statement issued in March 2017.

As part of the specialist construction industry, the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities and its supply chain.

Company structure and supply chains

CRL was founded in 1954 as a specialist contracting company. Over the past 65 years the business has maintained this specialist classification providing a comprehensive asset management and maintenance service to various private and public clients. CRL operates in various sectors, including; highways, marine, water, heritage, car parks, building and rail.

CRL has its own workforce of directly employed operatives, foremen and managers. Where we need or are required to use subcontractors and suppliers, only those who have been accepted onto our Company Supply Chain, as set out in our Company Management System, are utilised.

Countries of operation and supply

CRL's workload is almost entirely within the United Kingdom.

Risk Assessment of Current Activities

The following activities are considered medium risk of slavery or human trafficking:

- The use of agency workers for labour intensive activities
- Subcontractor packages with high labour content, especially where overseas operatives may be used.
- The source of raw materials for the products we use; where the materials are obtained and what the slavery and human trafficking situation is in these areas/companies

Responsibility

Responsibility for the Company's anti-slavery and anti-human trafficking initiatives is as follows:

- **Policies:** The Board of Directors is responsible for putting these policies and procedures in place. In order to do so, the Board will rely upon Director's and Senior Management to review company processes in its supply chains.
- The Board of Directors is responsible for reviewing this policy annually.
- **Risk Assessments:** The responsibility for human rights and modern slavery risk analysis lies with the Directors and Senior Managers within the company.
- **Training:** Awareness training and employee responsibilities training will be organised by the Training Manager.

Relevant Policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Centura Group Modern Slavery and Human Trafficking Policy:** This policy reflects the Groups' commitment to acting ethically and with integrity in its business relationships and to implementing and enforce effective systems and controls to increase awareness of slavery and human trafficking and to check it is not taking place in its supply chains.
- **Group Code of Conduct:** The Company's rules of conduct make clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Supplier/Procurement code of conduct:** The Company is committed to consulting with its suppliers that they adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to seek

assurances that they meet the standards of the code and improve their workers working conditions. However, serious violations of the Company's supplier code of conduct may lead to the termination of the business relationship if suitable improvements are not made.

- **Whistleblowing Policy:** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can speak to; the Managing Director, Directors, Senior Managers or the HR Department as they deem appropriate.
- **Recruitment Policy:** The Company uses only specified, reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency.
- **Dignity at Work Policy**
- **Equality & Diversity Policy**
- Various other written employment practices and procedures which ensure fair recruitment and treatment of employees.

Directors and Senior Management will revisit and develop these policies and procedures during the year and initiate any necessary revisions.

Due Diligence

Where available, we make use of Constructionline to certify our supply chain. Constructionline, originally a UK government owned department, provides a comprehensive vetting and certification service for construction related contractors, consultants and material suppliers.

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- Consider the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- Request information from our supply chain in relation to their modern slavery and human trafficking systems and procedures and seek their written agreement that they meet the code of conduct.
- Increase employee awareness of modern slavery and human trafficking
- Increase supply chain awareness of modern slavery and human trafficking

We propose to increase awareness by way of a combination of the following:

- Organised training
- Toolbox talks
- Induction training
- Signage (at our offices and worksites)

- Posters (at our offices and worksites)
- Consultation meetings

Performance Indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- Requiring key staff involved with the procurement and management of our supply chain to have completed training on modern slavery by 31st December 2019
- Further developing our system for supply chain verification whereby the Company evaluates potential suppliers before they enter the supply chain
- Reviewing its existing supply chains in line with our procedures.

Training

The Company requires the key staff within the Company to complete specific training on modern slavery. The Company's modern slavery training covers:

- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available, for example through the Modern Slavery Helpline, Gang masters Licencing Authority and "Stronger Together" initiative.
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps the Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chains.

Board Approval

This statement was approved by the Company's Board of Directors on the 21st February 2019 and will be reviewed and updated annually.

Signed



A P Rimoldi
Chief Executive
February 2019