



**MODERN SLAVERY STATEMENT OF
CASTLE CEMENT LIMITED**

Castle Cement Limited forms part of the Heidelberg Materials UK Group of companies and is ultimately owned by Heidelberg Materials AG. A modern slavery statement has been prepared for Heidelberg Materials UK and it is annexed below. Castle Cement Limited is adopting that statement in order to fulfil the requirements of s.54(1) of the Modern Slavery Act 2015 for the financial year ended 31 December 2023.

This statement was approved by the board on 20 June 2024.

Signature of Director

E A Gretton

On behalf of Castle Cement Limited



**MODERN SLAVERY STATEMENT OF HEIDELBERG MATERIALS UK
FOR THE YEAR ENDED 31 DECEMBER 2023**

Introduction

This is the modern slavery and human trafficking statement of Heidelberg Materials UK, being Hanson Quarry Products Europe Limited and all its subsidiaries and UK group companies. This statement is made pursuant to s.54(1) of the UK Modern Slavery Act 2015 (the “Act”) and adopted by companies in Heidelberg Materials UK as their respective slavery and human trafficking statement for the financial year ended 31 December 2023¹.

The Modern Slavery Act 2015 creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking. Heidelberg Materials UK is committed to combatting all such forms of modern slavery.

In accordance with the Act, this statement is published on Heidelberg Materials UK’s websites (www.heidelbergmaterials.co.uk and others). The formal requirement is to publish this statement within six months after the end of the financial year 31 December 2023 (therefore before 1 July 2024) although Heidelberg Materials UK works to publish its statement as soon as possible after the end of each year. This statement will be reviewed, updated and published annually and the statement will therefore be reviewed and updated at the end of each financial year.

Heidelberg Materials UK

Heidelberg Materials UK produces aggregates (crushed rock, sand and gravel), ready-mixed concrete, asphalt, cement and cement related products, recycled materials and undertakes certain contracting services. Heidelberg Materials UK is a part of the global Heidelberg Materials group of companies, the group headed by Heidelberg Materials AG (“Heidelberg Materials”), which has leading positions in aggregates, cement and concrete. Further information on our company structure can be found [here](#).

The vast majority of Heidelberg Materials UK’s suppliers (and supply chain) are UK based. As such, products and materials are largely sourced only from the UK. Heidelberg Materials UK’s supply chain also draws on certain supplies to the wider Heidelberg Materials group. As a result

¹ Relevant companies in the Heidelberg Materials UK Group will adopt this statement in accordance with Home Office guidance. Where those companies have a website, the statement will be published on it. The operating companies have also published the statement on the government’s Modern Slavery Statement Registry. Otherwise, the statement will be held at the relevant company’s registered office in accordance with the Act.

of any risks faced by supplies sourced from the UK, as well as in the context of the risks arising from other countries, Heidelberg Materials UK has in place various policies, procedures and processes to address modern slavery risks in its supply chain. These are described in this statement.

Policies and procedures in respect of modern slavery

Heidelberg Materials UK operates under a Heidelberg Materials group compliance framework, which commits companies to the core labour standards of the International Labour Organization (the "ILO"), the OECD Guidelines for Multinational Enterprises, the UN's Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. These principles have been incorporated into the Heidelberg Materials Policy Statement on Human Rights, which was reissued in July 2023 as part of an update to its human rights policy. A dedicated Human Rights Compliance Team was set up and a Human Rights Officer was appointed to develop, implement and monitor a human rights compliance management system, which has been designed to meet human rights commitments.

Heidelberg Materials UK follows a Code of Business Conduct which can be found [here](#). This commits Heidelberg Materials UK to conduct business strictly in accordance with all applicable laws and regulations. Heidelberg Materials UK is committed to fair employment practices and to following all applicable labour and employment laws.

Heidelberg Materials UK's standard contractual terms of purchase require suppliers and relevant third parties to comply with a specific Supplier Code of Conduct, a copy of which can be found [here](#). This Supplier Code of Conduct requires vendor compliance with international worker safety and well-being standards and principles of the ILO.

Key requirements from the Supplier Code of Conduct in respect of modern slavery are as follows:

- Suppliers are prohibited from using child labour in any stage of manufacturing. Suppliers are required to operate in accordance with the ILO convention recommendation of minimum age for admission to employment.
- The ILO Worst Forms of Child Labour Convention must be adhered to for children under 18 years of age including, but not limited to, all forms of slavery and the use of children for illicit activities and work which is likely to harm the health, safety or morals of children.
- Suppliers must pay an adequate living wage amounting to at least the minimum wage laid down by the applicable law.

- No form of forced or compulsory labour may be used, for example as a result of debt bondage, human trafficking, recruitment fees or withholding workers identification papers.
- Suppliers must not use any form of slavery and practices akin to slavery, serfdom or other forms of domination or oppression in the workplace, including forced prison labour. Employees' freedom of movement must not be restricted and employees must be free to leave employment on reasonable notice.
- Suppliers are expected to adhere to the right of employees to freedom of association and recognition of employees' rights to strike and collective bargaining, in accordance with local law.
- Workers must have safe and healthy working conditions that meet or exceed applicable standards for occupational health and safety.
- Suppliers must require their own direct suppliers to adhere to the principles of the Supplier Code of Conduct and exercise diligence in verifying that these principles are being adhered to in their supply chains.

Heidelberg Materials UK's production sites and products are certified to the latest BES 6001: Issue 4.0 standard in respect of Responsible Sourcing of Construction Products. Responsible Sourcing of Construction Products encompasses social, economic and environmental dimensions and version 4.0 places enhanced emphasis on social aspects, sustainable procurement and supply chain engagement and additional environmental themes including biodiversity and site stewardship. A list of Heidelberg Materials UK's accreditations can be found [here](#)². Members of Heidelberg Materials UK have been awarded an 'Excellent' rating in respect of: Aggregates; Asphalt; Cement; Midland Quarry Products, Packed Products; Concrete; and Ground Granulated Blastfurnace.

Heidelberg Materials UK's Sustainability Policy can be found [here](#). It confirms our objective of striving for the fair treatment of everyone in our supply chain and confirms that we are committed to complying with certain standards (including BES 6001) in respect of the responsible sourcing of construction products.

² Please enter the search term BES 6001.

Assessing and managing risk

Heidelberg Materials has been running a risk assessment survey in respect of child labour and human rights violations since 2013. Heidelberg Materials UK has also completed its own human rights risk assessment in 2023.

Heidelberg Materials UK's suppliers are assessed against wide ranging criteria during tender / appraisal processes. This includes assessment against the Code of Conduct and the Supplier Code of Conduct. Specific diligence is required by the standard appraisal procedure in respect of modern slavery, health and safety and corporate social responsibility, including diligence in respect of working conditions, employee pay, employee age restrictions and independent employee grievance procedures. The Master Data team at Heidelberg Materials UK's Shared Service Centre carry out many wide-ranging background checks in conducting such diligence in order to make a risk assessment as to whether new suppliers meet such criteria and any alerts are flagged for further internal review and also recorded to monitor year by year trends.

The procedures of Heidelberg Materials UK are regularly assessed against best practice. Part of this assessment is a review of the extent to which modern slavery can be identified and eliminated from its business and supply chain.

The Heidelberg Materials group has a global pre-qualification program for its suppliers and contractors to assess suppliers' ability to fulfil Heidelberg Materials' requirements with regard to sustainability and corporate social responsibility. Questions are asked and documentation requested in areas relevant to modern slavery including voluntary employment, child labour, freedom of association and human rights and welfare.

Heidelberg Materials UK also has in place a Heidelberg Materials compliance hotline (SpeakUp) for reporting any incidents of non-compliance with the Supplier Code of Conduct. Since 2013, this has also included criteria for reporting violations (if any) of various human rights and core labour standards such as discrimination and child labour. It enables both internal and external whistle-blowers to provide information about possible human rights violations and infringements of labour standards, as well as in relation to infringements of other laws. Every report is investigated. As in previous years, there were no instances of child labour or forced labour reported or alleged within Heidelberg Materials UK's business or supply chains in 2023.

Heidelberg Materials UK implemented training in respect of both anti-slavery and human rights to further enhance its protocols, and over one thousand five hundred employees in Heidelberg Materials UK have completed each training course to date, including new joiners, during 2023.

This is in addition to general compliance training that Heidelberg Materials UK has in place. Modern slavery awareness is also raised through an annual company-wide bulletin.

In 2022, a new platform, SAP Ariba Sourcing, featuring an integrated risk assessment module, which further enhanced its supplier vetting process in relation to modern slavery, was introduced by Heidelberg Materials. Heidelberg Materials UK completed the set-up of the new portal during 2022 allowing for a simplified process in securing suppliers' agreement to adhere to the Supplier Code of Conduct. Heidelberg Materials UK also carried out in 2023 more detailed assessments of about a hundred existing suppliers via its Integrity Next portal to ensure all our corporate social responsibility requirements are met.

In addition, Heidelberg Materials UK exceeded its 2023 year-end target for 80% of supplier expenditure to comprise suppliers who have contractually agreed to comply with the Supplier Code of Conduct. The final percentage of such supplier expenditure for 2023 was 90%.

This statement was approved by the board of directors of Hanson Quarry Products Europe Limited on 13 March 2024.



E A Gretton

Director of Hanson Quarry Products Europe Limited