



**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 2025.

This statement was approved by the board on 8 June 2026.

Edward A Gretton

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 2025**

Introduction

This is the modern slavery and human trafficking statement of Heidelberg Materials UK, being Hanson Quarry Products Europe Limited and certain key 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 2025¹.

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 2025 (therefore before 1 July 2026) 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 and construction waste recycling 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 operates across more than 50 countries and 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) operate within the UK. As such, products and materials are largely sourced only from the UK. A proportion of our

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.

supply chain operates internationally, and Heidelberg Materials UK recognises that the risk of modern slavery can vary depending on geographic as well as sector-specific factors. As it operates in the construction sector, and its activities involve potentially hazardous work, Heidelberg Materials UK conducts enhanced due diligence on selected supply chains considered to present a potentially greater degree of risk of modern slavery and we have developed processes to continuously review our policies and mitigate these risks.

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, the latest version of which was updated in July 2025 and can be found [here](#).

Heidelberg Materials UK has a Human Rights Coordinator who has responsibility for monitoring and coordinating human rights compliance management at Heidelberg Materials UK, in collaboration with the procurement, health and safety, human resources and environmental areas of the business.

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, together with purchase orders in relation to such terms, 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.

All these policies and codes are readily accessible to employees of Heidelberg Materials UK and are communicated to them.

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;

² Please enter the search term BES 6001.

asphalt; cement; Midland Quarry Products, packed products; ready-mixed concrete; and ground granulated blastfurnace slag.

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.

Heidelberg Materials UK is committed to the health, safety and wellbeing of our employees, suppliers and communities in which we operate. We have a dedicated integrated management system to monitor compliance with health and safety laws, standards and policies at our sites and in 2025 all our sites completed the annual operational safety improvement plan and annual health and wellbeing improvement plan.

During 2025, Heidelberg Materials UK introduced the MP Connect Card, a mandatory digital, real-time competency card required by drivers and contractors to access its quarry sites. The on-site scanning of the card enables the credentials and competencies of all drivers and contractors to be verified, which ensures that all drivers and contractors on site have the necessary training and safety certifications, thereby reducing the likelihood that unlicensed or exploited workers, or forced labour are allowed to operate.

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 2025 and will continue to undertake an annual human rights risk assessment.

Heidelberg Materials UK's suppliers are evaluated through rigorous due diligence processes during tendering and contract awarding. This includes acceptance of Heidelberg Materials' 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 carries 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.

Whistleblowing and reporting mechanisms

Heidelberg Materials UK has a Whistleblowing Policy and Procedure which sets out how employees can raise concerns on various matters including modern slavery. Pursuant to this Policy, Heidelberg Materials UK also has in place a Heidelberg Materials confidential and anonymous compliance hotline (SpeakUp) for reporting any incidents of non-compliance with any law, regulation or policy, including 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. Access to SpeakUp is available via the Heidelberg Materials UK website and it is also advertised at our sites and in our standard terms and conditions. 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 2025.

Training and awareness

Heidelberg Materials UK continued to implement training in respect of both modern slavery and human rights to further enhance its protocols, and well over one thousand six hundred employees in Heidelberg Materials UK have completed each training course to date, including new joiners. During 2025 a total of 213 employees completed the modern slavery or human rights course. A further 429 new joiners undertook a human rights course as part of their induction training.

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

Supplier engagement and compliance targets

Heidelberg Materials UK uses the SAP Ariba Sourcing platform, featuring an integrated risk assessment module, which enhances its supplier vetting process in relation to modern slavery. A portal allows for a simplified process in securing suppliers' agreement to adhere to the Supplier Code of Conduct.

Heidelberg Materials UK also carried out more detailed assessments of 147 existing suppliers during 2025, via its IntegrityNext portal, to ensure all our corporate social responsibility requirements are met.

In addition, Heidelberg Materials UK exceeded its 2025 year-end target for 90% of supplier expenditure to comprise suppliers who have agreed to comply with the Supplier Code of Conduct, achieving a 91% year-end figure for supplier compliance with the Supplier Code of Conduct.

KPIs for 2026

- An annual human rights risk assessment is to be completed by Heidelberg Materials UK.
- A human rights e-learning refresher course, including modern slavery training, is to be completed by approximately 1700 relevant employees.
- At least 90% of total supplier expenditure to comprise suppliers which have confirmed compliance to the Supplier Code of Conduct in addition to their contractual commitments which apply to all suppliers.
- More than 200 suppliers to complete on our IntegrityNext portal a detailed questionnaire on compliance with ESG principles and policies, including human rights.

This statement was approved by the board of directors of Hanson Quarry Products Europe Limited on 5 May 2026.



E A Gretton

Director of Hanson Quarry Products Europe Limited