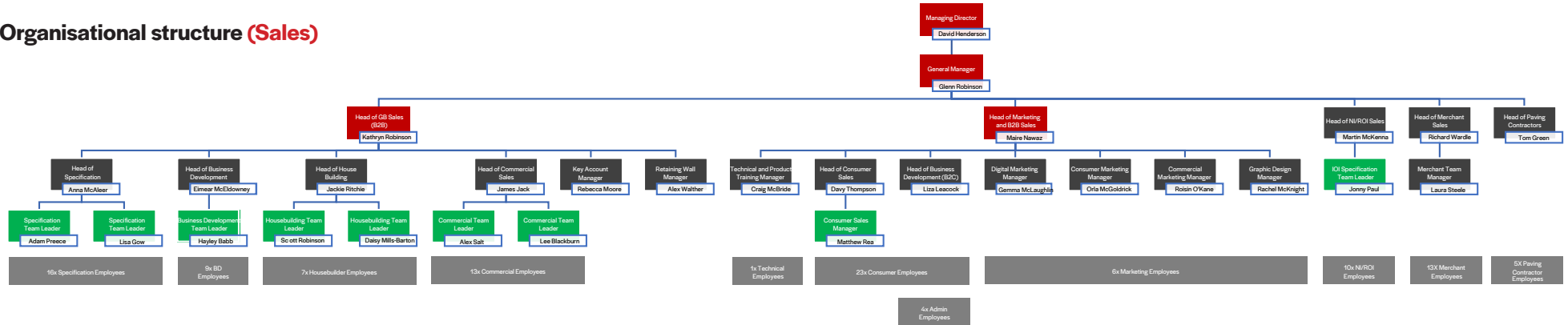


MODERN SLAVERY STATEMENT

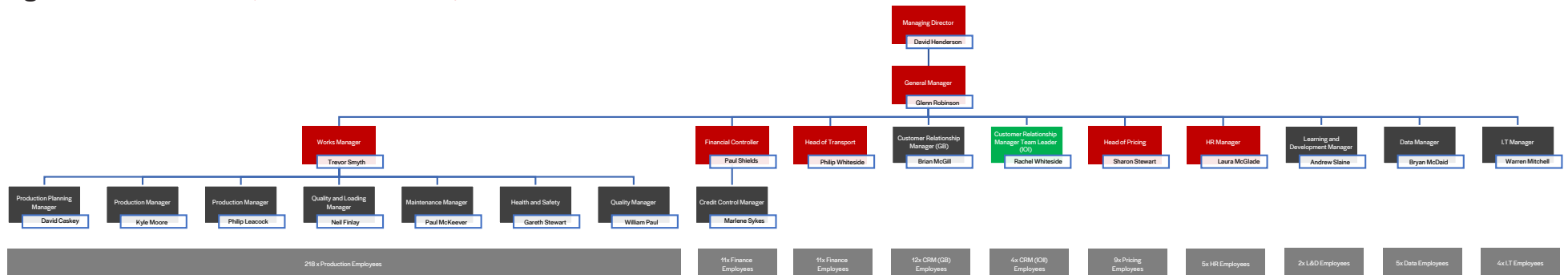
Organisation

This statement applies to Tobermore Concrete Products Ltd (referred to in this statement as ‘the Organisation’)
The information included in the statement refers to the financial year April 2021.

Organisational structure (Sales)



Organisational structure (Office & Production)



MODERN SLAVERY STATEMENT

Permanent office locations are HQ & Paving Centre in Tobermore, Northern Ireland, Paving Centres in Bangor also in Northern Ireland. In the ROI we have paving centres based in Dublin & Cork.

The company's main operations is the manufacture of concrete products such as block paving, concrete paving, permeable paving, kerbs and edging, steps, retaining walls and walling & masonry to the NI, ROI & GB Markets both domestic and commercial.

The labour supplied to the Organisation in pursuance of its operation is carried out in NI, ROI & GB and covers all regions within these areas

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in NI, ROI & GB and in many cases exceeds those minimums in relation to its employees.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to cement, aggregate, wooden pallets, pigment, packaging, electrician work, haulier and equipment. We understand that the Organisation's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

MODERN SLAVERY STATEMENT

Potential exposure

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Impact of COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted, delay, the Organisation remains in a position to publish its statement for the financial year 2020/2021 in line with the original publishing requirements.

The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.

During the pandemic, the Organisation's employees still had access to the grievance procedure to raise any concerns that they may have had.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place.

- We review our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- We have measures in place to identify and assess the potential risks in our supply chains
- We undertake impact assessments of our services upon potential instances of slavery
- We create action plans to address risk to modern slavery

MODERN SLAVERY STATEMENT

Key performance indicators

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

Steps are taken in the recruitment of our employees to ensure modern slavery is not taking place, through ID checks and appropriate control measures on payment details. Annual checks also apply.

Steps are also taken on our suppliers to ensure they are taking appropriate action to comply with modern slavery. We contact all our suppliers and monitor their control measures.

Policies

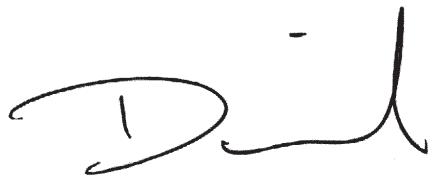
The Organisation has the following policies which further define its stance on modern slavery, our corporate social responsibility policy; and recruitment policy.

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 01.04.21



Signed: _____

Print name: David Henderson

Job Title: Managing Director

Date: 01.04.21