

# CCG SLAVERY AND HUMAN TRAFFICKING POLICY

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APR 01/18 - MAR 31/19



CCG

# BUILDING FUTURES



## CONTEXT

Modern slavery is a violation of fundamental human rights. It may take various forms, such as servitude, forced and compulsory labour and human trafficking. Illegal practice permeates many aspects of the legitimate economy with construction one of the industries subject to its influence.

The Modern Slavery Act 2014 has been introduced with the aim of stamping out slavery and trafficking and created a number of new criminal offences. The Act also contains a number measures intended to encourage businesses to take steps to address modern slavery. Commercial organisations supplying goods or services with a turnover over £36 million per annum must now comply with disclosure requirements.

The purpose of this policy is provide information to all persons working for CCG in any capacity on how the company deals with modern slavery and the role that all individuals involved with our business must play in ensuring compliance with the Act.

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## STATEMENT

CCG takes a zero-tolerance approach to modern slavery in all its different guises. As part of an industry with widespread supply chain networks, we recognise our responsibility to take a robust approach to preventing slavery and human trafficking with an absolute commitment to acting ethically and with integrity in all our business dealings.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Act.

We expect the same high standards from all of our business associates, and expect the supply chain to impose the same standards on their own network.

This policy applies to all persons working for any part of our Group of companies or on our behalf in any capacity and within any part of our Divisions, including all members of our supply chain and business partners.

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## COMPLIANCE

All our employees must read, understand and comply in all respects with this policy. Any activity which could lead to or suggest a breach of this policy is strictly prohibited. It is the responsibility for all those that work or with CCG to ensure the prevention, detection and reporting of any possible breaches of this policy, within any part of our Divisions, including all members of our supply chain and business partners.

All our employees are encouraged to raise concerns about any issue or suspicion of modern slavery at the earliest possible stage. CCG promotes openness and transparency so that any person that raises a genuine concern in good faith under this policy will be supported by the business, even if they turn out to be mistaken. We will investigate all genuine concerns which are raised in connection with this policy and our employees know that they can act without any fear of reprisal.

If an employee believes or suspects that there has been a breach of this policy, or a breach may occur in the future, they must notify their line manager and the HR Department as soon as possible.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any suspicion they might have.

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## APPROACH

- Make clear our zero-tolerance approach in all relevant business relationships
- Identify and assess supply chain links most at risk from slavery and human trafficking
- Incorporate anti-slavery and human trafficking obligations into procurement agreements
- Provide training for employees to ensure a high level of understanding of the risks of slavery and human trafficking
- Report our commitments, policy, performance and actions in tackling slavery and human trafficking as part of annual reporting
  
- Our Policy will be relayed to all external parties at the outset of our business relationship with them and as appropriate thereafter
- We will review this Policy annually and update it where necessary within any part of our Divisions, including all members of our supply chain and business partners.

## BREACHES

Any employee found to be in breach of this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they are found to be breach this policy.

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## RESPONSIBILITY

CCG's Board of Directors has overall responsibility for ensuring that this policy complies with legal and ethical obligations, and that all those under our control comply with it. Management personnel at all levels within our business are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training in this regard.

Bernard Rooney, Financial Director, has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

A handwritten signature in black ink, appearing to read 'Alastair Wylie', is positioned above the printed name and title.

**ALASTAIR WYLIE**  
**CHAIRMAN AND CEO**



## FURTHER INFORMATION

For further information regarding this policy please contact:

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