

## Slavery and Human Trafficking Policy Statement

### INTRODUCTION

At FP McCann we recognise that slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

### ORGANISATION'S STRUCTURE

FP McCann through its Quarries, Surfacing, Readymix and Precast plants, supply a wide range of heavy building materials to the construction industry. We offer a range of sustainable and innovative product solutions that complement our standard package of products and services. The group has its head office in Northern Ireland and all trading outlets are in the UK.

### OUR SUPPLY CHAINS

Our supply chains include the sourcing of raw materials principally related to the provision of precast concrete products, bitumen coated products and Readymix concrete.

### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. This Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk -

- We verify that all new employees have the right to work in the UK and pay their salaries to them direct.
- Where possible, we build long standing relationships with local suppliers and make clear our expectations of business behaviour and our policy on modern slavery.
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.
- Our supply chain documents require that our sub-contractors and suppliers acknowledge their responsibility to Slavery and Human Trafficking by having a Slavery and Human Trafficking Policy, if not, we seek their agreement to abide by our policy.
- We have in place systems to encourage the reporting of concerns without the fear of reprisal and the protection of whistle blowers. Management are expected to act upon concerns reported.

### SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

The Company Directors are responsible for compliance in their respective departments and for their supplier relationships.

## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject. Modern Slavery Awareness training has been developed to raise awareness for our Managers and Toolbox Talks have been developed to raise awareness of modern slavery for our own employees and site operatives employed by our supply chain. All new employees receive a toolbox talk on Modern Slavery and Human Trafficking Awareness as part of their induction to the company.

## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of premises Audits by Safety, Health and Environmental Managers, Factory/Quarry Managers and the Human Resource Manager;
- Use of labour monitoring and payroll systems to check eligibility of employees in the UK; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

We continue to be committed to human rights and participate in the UK Government Registry of Modern Slavery Statements. This statement is registered and will be reviewed and updated as necessary on at least an annual basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

## IDENTIFICATION OF NEW RISKS

Starting in FY 2024/2025, we will import sandstone from India for resale through UK retail outlets. We are aware that allegations have been made about forced labour in Indian stone supply chains and regard this as a risk. To mitigate this, we are using a supplier with many years experience of exporting to the UK who is aware of the issue and whose HR policies we have reviewed. We do recognise that we need to go beyond this in lower tiers in the supply chain and will commission an independent third party to carry out a full Human Rights Due Diligence exercise in the first quarter of 2025. While this will cover a wide range of human rights issues, particular attention will be paid to the possibility of modern slavery issues and the International Labour Organisations' eleven indicators of forced labour will be the benchmark. We will report on this in the next revision of our Modern Slavery statement.

## Modern Slavery Statement Registry

This statement will be uploaded to the voluntary Modern Slavery Statement Registry run the by the UK Government. See <https://modern-slavery-statement-registry-service.gov.uk>

## Review

The Senior Management Team will monitor and review this policy regularly.

Signed:   
Hugh McCann  
Managing Director

Reviewed: 12 January 2026  
Last Reviewed: 11 January 2025  
Next Review: January 2027

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