

CCG SLAVERY AND HUMAN TRAFFICKING POLICY

APR 01/19 - MAR 31/20



CCG

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COMMITMENT TO TACKLING MODERN SLAVERY

This statement has been published in accordance with s.54 of the Modern Slavery Act 2015 and the and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015. It sets out the steps taken by CCG Group (as set out below) during the year ending 31 March 2019 as well as the steps that it is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

We know that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a growing issue and no sector or industry can be considered immune or untainted. CCG has a zero tolerance approach to Modern Slavery of any kind within our own operations and supply chain. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

OUR ORGANISATION AND SUPPLY CHAIN

CCG Group is a privately owned multi-disciplinary group of companies that operate in the construction industry in Scotland. The companies that are members of the group are:

CCG (Holdings) Limited
CCG (Scotland) Limited
CCG (OSM) Limited
CCG Manufacturing Limited
CCG Homes Limited
Arc- Tech (Scotland) Limited
Hampton & Steel Limited
D Campbell & Company Limited

This statement addresses the measures put into place by the entire CCG Group. The group has a total turnover of £168,418,091 and has approximately 696 employees. The group's trading activities are carried out in the United Kingdom only and include:

- construction activities within Affordable Housing, Private Housing, Commercial and Industrial sectors;
- the sale of private housing
- bricklaying
- plumbing & heating
- mechanical & electrical
- manufacture and erection of timber systems
- manufacture and sale of joinery products and flooring.

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Our supply chain includes:

- consultants and advisers
- contractors and sub-contractors
- suppliers of goods, supplies and materials for all stages of the construction cycle; and
- suppliers of plant and machinery.

IDENTIFICATION OF KEY RISKS

We have identified the following areas of the supply chain as comprising the highest risk of slavery and trafficking activities:

- a. Human trafficking – in circumstances when using sub-contracted labour forces, where coerced/trafficked gangs may be present.
- b. Slavery and human trafficking – in circumstances when using materials such as ‘conflict minerals’ (tantalum, tin, gold or tungsten), steel, or other raw materials being predominantly sourced from countries with poor records on slavery and human trafficking.

Our measures this year have been focussed on eliminating these two risk items.

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POLICY

This year we have introduced a new policy on Slavery and Human Trafficking is included in our suite of documents and working practices. Our policy reflects our commitment to act ethically and with integrity in all our business. It states our commitment to work with staff, consultants and our supply chain to ensure that we tackle modern slavery throughout the supply chains.

The policy, emphasises that 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. These policies were signed off at board level.

DUE DILIGENCE & AUDITS OF SUPPLIERS

As set out above, we understand that our biggest exposure to Modern Slavery is in our product supply chains, where we have undertaken activity over last decade to minimise the risk of Modern Slavery.

Within these areas, we work closely and in partnership with our supply chain to develop long-term working relationships. We currently have in place a sub-contractor application form that requires to be completed by any new contractors. We also have minimum trading standards which we expect all of our sub-contractors to abide by.

FINDINGS

We report that we have had no reportable instances of human trafficking within our reporting period from 1 April 2018 to 31 March 2019.

EFFECTIVENESS IN PREVENTING MODERN SLAVERY

We understand that Modern Slavery risk is not static, and will continue our approach to mitigating this risk in the year ahead. In particular during 2019-2020 we will:

- Undertake a mapping exercise to assess any geographical risks related to the supply chains;
- Will review our current application forms and minimum trading standards to update the provisions in respect of
 - o The requirement that the employers include good working conditions and fair treatment;
 - o That worker's human rights are respected and that they will comply with all applicable laws (including the Modern Slavery Act)
 - o Ensure all work is voluntary and not done under any threat of penalties or sanctions
 - o Where recruiters are used they do not keep the original identity documents but only keep copies.
 - o That they implement appropriate controls to prevent Modern Slavery
 - o That they notify the group in the event that they become aware of any Modern Slavery within their own business or supply chains
 - o They will comply with any requirements in respect of our audit.
- We will review our HR policies to ensure that our Whistleblowing policy is relevant in relation to the challenges of Modern Slavery
- We will review our internal recruitment process to raise awareness of the issues

We will be reporting to the board against these key tasks in our future Modern Slavery statements.

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TRAINING

We are committed to providing all our appropriate staff with training on aspects of the Modern Slavery Act emphasizing the potential risks to our business and the requirements of our employees and our supply chain.

RESPONSIBILITY

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and was approved by the Board of Directors of each of the companies within the Group and will be reviewed and updated annually.

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

ALASTAIR WYLIE
CHAIRMAN, DIRECTOR, CHIEF EXECUTIVE



FURTHER INFORMATION

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