

CCG SLAVERY AND HUMAN TRAFFICKING STATEMENT 2023



CCG

COMMITMENT TO TACKLING MODERN SLAVERY

This statement has been published in accordance with s.54 of the Modern Slavery Act 2015 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 2023 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.

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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
Arc-Tech MU Ltd
Hampton & Steel Limited
D Campbell & Company Limited
CCG Letting Ltd

This statement addresses the measures put into place by the entire CCG Group.

The group has a total turnover of £248,812,406 and has approximately 692 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
- multi-utilities
- 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 focused on eliminating these two risk items.

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POLICY

In 2019 we introduced a new policy on Slavery and Human Trafficking. This 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 2022 to 31 March 2023.

EFFECTIVENESS IN PREVENTING MODERN SLAVERY

We understand that Modern Slavery risk is not static. During the year 1 April 2022 – 31 March 2023 we took the following steps:

- We have continued the mapping exercise of our suppliers which has allowed us to assess any geographical risks related to the supply chains. The majority of our first tier suppliers are based in the UK;
- We have continued to raise awareness of modern slavery in the workplace by:
 - o reminding the board of the demands of Modern Slavery legislation to ensure awareness at the highest level of the company;
 - o ensuring that our key staff dealing with HR and Recruitment and sub-contractors/supply chain have had awareness raising/online training video to raise awareness of modern slavery;
 - o raising the issue with staff generally including making sure that posters and other information is placed within the staff areas, highlighting what constitutes modern slavery and also what staff should do if they have concerns about any aspects of modern slavery;
- We reviewed and revised our HR policies to ensure that our Whistleblowing policy is relevant to the challenges of Modern Slavery;
- We reviewed our current application form to ensure that it addressed that our supply chain should recognised both their role and our role in maintaining the standard expected within the legislation governing the challenges of Modern Slavery

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- We reviewed our employee new start information documentation and introduced improvements to ensure that the documentation is relevant to the challenges of Modern Slavery;
- We have reported on progress to the board.

Over the course of the next year, we will continue:

- The mapping exercise to the next stage by assess any geographical risks related to the supply chains and our second tier suppliers;
- To review our current application form for suppliers, our employee new start documentation information and our HR policies and introduce improvements to ensure that the documentation is relevant to the challenge of Modern Slavery;
- To monitor publications and legislation to ensure that we are monitoring any incidents or issues that arise which will result in any changes to the way we address the challenges of Modern Slavery within the Group

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. We provided training in the year 1 April 2022 – 31 March 2023 and we intend to provide updated training over the course of this coming year.

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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

For further information regarding this policy please contact:

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