	POLICY		Page	Issue No
	Ref	HR021		1
	Title	Anti-Slavery and Human Trafficking Statement		Issue Date
			1 of 2	01/01/2017

DATE	PAGE No.	ISSUE No.	DESCRIPTION	APPROVED
01/01/2017	All	1	Anti-Slavery and Human Trafficking Policy	LMcD

Introduction

The Company is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines the Company's position on combatting slavery and human trafficking in our business.

Organisational Structure

Whitemountain is market leader in the quarry materials, asphalt, surfacing, airfield maintenance, highway maintenance, bitumen and civil engineering sectors. We have an established reputation as a reliable supplier of superior quality aggregates and surfacing products to major UK and European based contractors. Whitemountain is a wholly owned subsidiary company of the Lagan Group of companies with its head office based in the UK and all trading outlets either in the UK or in the EU. The company has an annual turnover in excess of £36m.

Our Business

Our business is organised into two business units: Civil Engineering and Contracts and, Quarrying, Aggregates and Asphalt Production.

Our Supply Chains

Our supply chains include the provision of raw materials principally related to construction and civil engineering projects.


Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Statement 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.

As part of our initiative to identify and mitigate risk –

- We practice the direct recruitment of employees to our company and have screening processes in place to check identification and right to work;
- We limit the geographical scope of our projects to ensure optimum supervision of sub-contractors and the provision of workforce;
- Where possible we build long standing relationships with local suppliers and contractors and make clear our expectations of business behaviour;
- With regards to national or international supply chains, our point of contact is preferably with UK companies and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

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	POLICY		Page	Issue No
	Ref	HR021	2 of 2	1
	Title	Anti-Slavery and Human Trafficking Statement		Issue Date

- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Supplier/Contractor 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 Operations and Finance 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.

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:

- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

Signed: 

Date: 17/1/17

Liam McDonald, Finance Director

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.

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