

# Crown Roofing and Cladding Ltd. Anti-slavery and Human Trafficking policy

The statement sets out Crown Roofing and Cladding Ltd (referred to hereafter as the company) commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff members are expected to report their concerns and management to act upon them.

### Structure and supply chains

The Company currently operates in two jurisdictions with offices in Ireland and Europe.

The policy implementation and responsibility for company anti-slavery initiatives resides with the Company's Chief Operating Officer, Emma O'Gorman Wall.

## **Training**

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company communicates the policy and highlights how to recognise risks of slavery and human trafficking, which is also included at induction and via toolbox talks.

#### **Policies**

The company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This statement affirms our intention to act ethically in all our business relationships.

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Company due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier. We invoke sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

In addition to the Anti-Slavery and Human Trafficking Policy, the company has additional related policies and documents.

The company's Whistleblowing Policy is highlighted to employees on a reoccurring basis. This policy facilitates and encourages employees to raise concerns or disclose information, which relates to wrongdoing, illegal practices, or unethical conduct, which may come to their attention through work (including concerns that may relate to modern slavery and human trafficking).

The company has a number of further policies and documents which reflect our objective to act ethically and in line with our legal and regulatory obligations with regard to our employees, clients and our business relationships.

Company Staff Handbook

Company Dignity at work policy

Company Ethics and Conflict of Interest policy

Company Equality policy

Company Anti-bribery and corruption policy

These policies and documents will continue to be reviewed on, at minimum, an annual basis.

## Due diligence procedures

We understand that our biggest exposure to abuse of the Modern Slavery Act 2015 is posed by our supply chains and we have taken steps in recent years to address this. As such all suppliers are subject to due diligence checks in the form of ethical and compliance audits and declarations.

We pride ourselves on our strong working relationships and understanding our suppliers. At no time is our commitment to the protection of people compromised and as such we have no reported incidences of slavery raised through a grievance process.

Authorisation: Emma O'Gorman Wall, Director/COO

Signed by:

Emma O'Gorman Wall

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Emma O'Gorman Wall

Director/COO

Date: 4/15/2021