



BARRACHANDER QUARRY

CLACHAN QUARRY

KILMARTIN QUARRY

ACHNABA QUARRY

SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

A&L McCrae Ltd (the 'Company') and its subsidiaries are committed to social and environmental responsibility and has zero tolerance for slavery and human trafficking. We will not tolerate the use of forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery, or trafficking of persons. The Company considers our suppliers' conduct when awarding and/or renewing business with our supplier chain.

As stated by the Home Secretary in the Guidance issued under Section 54(9) of the Modern Slavery Act 2015, modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'.

It is noted that many organisations are already taking action to promote ethical business practices and policies that protect workers from being abused and exploited in their own organisation and global supply chains. However, there are still far too many people in the world being treated as commodities. There are also far too many organisations ignoring such abuses or who are knowingly responsible for policies and practices that result in workers being subjected to modern slavery in their operations. The Government has introduced a provision in the Modern Slavery Act 2015 which requires certain businesses to produce a statement setting out the steps they have taken to ensure there is no modern slavery in their own business and their supply chains. If an organisation has taken no steps to do this, their statement should say so. The measure is designed to create a level playing field between those businesses, whose turnover is over a certain threshold, which act responsibly and those that need to change their policies and practices. However, the Government wants to encourage businesses to do more, not just because they are legally obliged to, but also because they recognise it is the right thing to do.

The Company is an organisation of a size that does not require to produce or implement a Slavery and Human Trafficking Statement or Policy, but we nevertheless would wish to illustrate our transparency by preparing this Statement to show our commitment.

Definitions

Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking.

The offences are set out in section 1 and section 2 of the Act, which can be found at:

<http://www.legislation.gov.uk/ukpga/2015/30/section/1/enacted>

<http://www.legislation.gov.uk/ukpga/2015/30/section/2/enacted>

Definition of Slavery and Servitude

Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom.

Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Definition of Forced or Compulsory Labour

Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

Definition of Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.

The meaning of exploitation is set out here:

<http://www.legislation.gov.uk/ukpga/2015/30/section/3/enacted>.

Recent figures from the UK National Crime Agency (NCA), show that the most prominent exploitation type recorded for potential victims first exploited as a child (where this is known), was labour trafficking.

Behaviour constituting modern slavery

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness seep into instances of human trafficking, slavery or forced labour in a work environment. However, businesses have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment (include wage and work hours), health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications. There will be cases of exploitation that, whilst being poor labour conditions, nevertheless do not meet the threshold for modern slavery – for example, someone may choose to work for less than the national minimum wage, or in undesirable or unsafe conditions, perhaps for long work hours, without being forced or deceived. Such practices may not amount to modern slavery if the employee can leave freely and easily without threat to themselves or their family. Organisations do still nevertheless have a legal duty to drive out poor labour practices in their business, and a moral duty to influence and incentivise continuous improvements in supply chains.

A focus on tackling modern slavery not only protects vulnerable workers and helps prevent and remedy severe human rights violations, it can bring a number of business benefits too. These include:

- protecting and enhancing an organisation's reputation and brand;
- protecting and growing the organisation's customer base as more consumers
- seek out businesses with higher ethical standards;
- improved investor confidence;
- greater staff retention and loyalty based on values and respect; and
- developing more responsive, stable and innovative supply chains.

The Company places emphasis on ensuring that we as an organisation, and our supplier chain, operate in full compliance with the Modern Slavery Act 2015.



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- Prior to appointing suppliers, we will assess these organisations to ensure that they are in compliance with associated legislation and do not work with or obtain materials or supplies from any organisation that are non-compliant or allow Slavery and Human Trafficking.
- Our operations are carried out mainly within the United Kingdom and therefore are less likely to be non-compliant in any way.
- None of our work is seasonal and will therefore not require rushed or forced unnecessary speed of appointment with associated loss of control or ability of carrying out proper investigation.
- None of our suppliers of services or materials use sources for goods or services from high risk countries where modern forms of slavery are prevalent.
- Our supply chains are assessed annually to ensure compliance.

The Company will ensure that all our undertakings are carried out in full accordance with all relevant Slavery and Human Trafficking legislation and subordinate regulations.

A blue ink signature of Calum McCrae, written in a cursive style.

Calum McCrae

Managing Director

1st Jan 2026 (rev Dec 27)