



# Slavery and Human Trafficking Policy Statement

Statement by the Managing Director of CDE Global Limited

We are proud of the conditions of employment for all our employees throughout CDE Global Limited and each of the companies forming part of the wider CDE group of companies ("CDE"). Given the nature of our business, our board and management teams each consider that there is minimal risk approximating to no risk that, either within CDE or the very specialised supply chains which support our business activities, that are in any way involved in or even tangentially supportive of, or complicit in slavery and human trafficking. The employment and procurement practices operated by CDE ensure that each of our companies are rightly viewed as excellent and supportive employers. Our purchasing department operate to a high level of ethical conduct, and only work with businesses for our goods or services within a very regulated supply chain.

## Organisation's structure

CDE's Head Office is in Cookstown, Northern Ireland and is the world's largest site dedicated to the wet processing of materials in the sand & aggregates. mining, C&D waste recycling, industrial sands and environmental sectors. Since our birth in 1992 we have grown to be the largest wet processing equipment company in the world, and as a result our focus is on constantly developing and improving materials for processing technologies.

## Our supply chain

CDE's supply chains are very specialised. CDE offers wet processing solutions. We manufacture machinery for the above sectors and manage a locally sourced, controlled and well established supply chain in relation to such activities. Our current policy is to secure at least 90% of our materials by value from 'local' sources, i.e. within driving distance from Head Office. This is to ensure we have an effective auditing process for new and existing suppliers.

## Anti-slavery Policy statement:

"CDE has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business."

This Anti-Slavery Policy Statement is the principal articulation of CDE's policy on slavery and human trafficking. It is intended to inform and influence all the operational procedures within CDE.

Our stated Anti-Slavery Policy 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 (amongst our other priorities) that slavery and human trafficking is not taking place anywhere in our business or related supply chains.



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### Due diligence and implementation processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures appropriate to CDE. These include the policies and procedures in the following areas:

- Third party provider and outsourcing;
- Whistleblowing; and
- Anti-money laundering, bribery and financial crime.

CDE also articulates a series of employee rights and benefits available to employees in the employee handbooks and individual contracts of employment for each member of staff.

CDE operates an HR department led by the Talent & Organisational Development Director, and is audited annually for ISO and Achilles Verify. This department and managers have reporting responsibilities to senior management and the board of directors within CDE. CDE uses the services of PWC as the external auditor and CDE's audited staff receive quarterly update reports from the external auditors and the internal auditors. A combination of these procedures and functions operates to help identify, assess and monitor potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in our supply chains.

It should be specifically noted that CDE pays all staff in line with UK living wage standards and national minimum wage standards also to any relevant countries wage standards for our overseas employees.

This is the first articulation of a formal Anti-Slavery Policy Statement for CDE. In future we will seek to ensure when entering into material contracts that all those in our supply chain and contractors comply with our stated Anti-Slavery Policy in particular when seeking tenders for service or when auditing our suppliers.

### Training

We will communicate this statement to all our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business and in future will include references as part of CDE's training and information materials.

### Legal and regulatory purpose of this statement

This statement is made with regard to the obligations arising under section 54(1) of the UK's Modern Slavery Act 2015 (the Act). CDE recognises the importance of these issues for all its stakeholders. Accordingly, this statement should be considered to constitute the slavery and human trafficking statement for CDE for the 2019 financial year and all future financial years until it may in future be modified or amended.



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Brendan McGurgan

Managing Director of CDE Global Limited

A handwritten signature in black ink, appearing to be 'B. McGurgan', is written over a solid black horizontal line.