



# Modern Slavery Act Statement

## Modern Slavery Statement of Mibau Stema UK Ltd

### Modern Slavery Act 2015

May 15, 2025

This is the modern slavery and human trafficking statement of Mibau Stema UK Ltd, being Mibau Holding and all its subsidiaries and UK group companies. This statement is made pursuant to s.54(1) of the UK Modern Slavery Act 2015 (the "Act") and has been adopted by all companies in the Mibau Group as their respective slavery and human trafficking statement for the financial year ending 31 December 2022. For the UK this cover Mibau Stema UK Ltd only as its UK registered office in accordance with the Act.

The Modern Slavery Act 2015 creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking. Mibau Stema UK Ltd is committed to combatting all such forms of modern slavery. This statement will be reviewed, updated and published annually and the statement will therefore be reviewed and updated at the end of this financial year.

Mibau Stema UK Ltd import aggregates (crushed rock, sand and gravel) to the UK for onward sales and distribution. Mibau Stema UK Ltd is a part of the global Heidelberg Materials Group of companies, which has leading positions in aggregates, cement and concrete.

The vast majority of Mibau Stema UK Ltd's suppliers (and supply chain) are European based. As such, products and materials are largely sourced only from the European Countries, mainly Norway and Denmark. Mibau Stema UK Ltd's supply chain also draws on certain supplies to the wider Heidelberg Materials Group. Owing to these global suppliers, Mibau Stema UK Ltd recognises that some countries in its supply chain may present an increased risk of modern slavery.

As a result of any risks faced by supplies sourced from within the European Community, as well as in the context of the risks arising from other countries, Mibau Stema UK Ltd has in place various policies, procedures and processes to address modern slavery risks in its supply chain. These are described in this Statement.

#### Policies and procedures in respect of modern slavery

Mibau Stema UK Ltd companies operate under a Heidelberg Materials Group compliance framework which commits the companies to the core labour standards of the International Labour Association (the "ILO"), the OECD guidelines for multinational enterprises and the UN's Universal Declaration of Human Rights. These principles have also been incorporated into the leadership principles.

Mibau Stema UK Ltd follows a Code of Business Conduct. This commits Mibau Stema UK Ltd to conduct business strictly in accordance with all applicable laws and regulations. Mibau Stema UK Ltd is committed to fair employment practices and to follow all applicable labour and employment laws.

Mibau Stema UK Ltd's standard contractual terms of purchase require suppliers, and relevant third parties, to comply with a specific Supplier Code of Conduct. This Supplier Code of Conduct seeks compliance with international social accountability standard SA 8000 and the principles of the International Labour Organisation.

Key expectations from the Supplier Code of Conduct in respect of modern slavery are as follows:

- Suppliers must not use child labour in any stage of manufacturing. Suppliers are requested to operate in accordance with the ILO convention recommendation of minimum age for admission to employment.
- Compensation and benefits must comply with fundamental principles relating to minimum wages, overtime hours and legally mandated benefits.
- Any form of forced or compulsory labour must not be used, and employees shall be free to leave employment after reasonable notice.
- Suppliers are expected to adhere to the right of employees to freedom of association and recognition of employees' rights to collective bargaining, in accordance with local law.
- Workers must have safe and healthy working conditions that meet or exceed applicable standards for occupational health and safety.
- Suppliers must require their own direct suppliers to adhere to the principles of the Supplier Code of Conduct and exercise diligence in verifying that these principles are being adhered to in their supply chains.

## Assessing and managing risk

The Heidelberg Materials Group has been running a risk assessment survey in respect of child labour and human rights violations since 2013.

Mibau Stema UK Ltd suppliers are assessed against wide ranging criteria during tender / appraisal processes. This includes assessment against the Code of Conduct and the Supplier Code of Conduct. Specific diligence is required by the standard appraisal procedure in respect of health and safety and corporate social responsibility, including diligence in respect of working conditions, employee pay, employee age restrictions and independent employee grievance procedures. The procedure dictates that each supplier has to be approved by the Purchasing Director according to such criteria.

The procedures of Mibau Stema UK Ltd are regularly assessed against best practice. Part of this assessment is a review of the extent to which modern slavery can be identified and eliminated from its business and supply chain. Mibau Stema UK Ltd is also currently implementing specific anti-slavery training and awareness as an enhancement to its current protocols.

A full assessment of the suppliers used by Mibau Stema UK Ltd has been conducted and we could not find any instances that gave any cause for concern.



Martin Johansen  
Managing Director  
Mibau Stema UK Ltd

Thurrock May 15<sup>th</sup> 2025