



# Supplier Code of Conduct



# CRH Supplier Code of Conduct

## May 2014

---

### CRH Supplier Code of Conduct

Introduction

CSR Requirements For All Suppliers

Additional Assurance Procedures

Code Violations, Reporting And Review

### Appendices

- I CRH Supplier Code of Conduct Acknowledgement: Higher Risk Suppliers
- II CRH Supplier Code of Conduct Questionnaire: Higher Risk Suppliers
- III CRH Supplier Code of Conduct Acknowledgement: Other Suppliers

# CRH Supplier Code of Conduct

## INTRODUCTION

CRH is committed to the highest levels of legal, ethical and moral standards, which we set out in our Code of Business Conduct\*. We place business ethics and Corporate Social Responsibility (CSR) at the forefront of all our business dealings, including those with our Suppliers, both direct and indirect, recognising that they are key stakeholders in the success of our business. Not surprisingly, our procurement requirements are very high; we expect our Suppliers to share our desire to be the best, to be innovative and efficient and quality driven. Above all we only choose Suppliers who share our unwavering commitment to good ethical practices and who meet our standards in respect of human rights, health & safety and environmental stewardship. This Supplier Code of Conduct (the 'Code') sets out these CSR requirements and how we want to ensure your compliance. In return, we strive to be a fair and honest partner, firmly believing that relationships built on these core values of trust and integrity will be sustainable and beneficial for all.

## CSR REQUIREMENTS FOR ALL SUPPLIERS

Suppliers must comply with all relevant laws relating to human rights, health, safety and the environment and anti-bribery and corruption (including the UK Bribery Act, US Foreign Corrupt Practices Act, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and section 1502 of the Dodd-Frank Act, if applicable). Suppliers must also adhere to good ethical practices as set out in the CRH Code of Business Conduct (page 11) and specifically undertake:

1. To support and respect the protection of human rights within their areas of influence.
2. To respect freedom of association and the effective recognition of the right to collective bargaining by employees.
3. To prohibit all forms of forced, compulsory and child labour.
4. To support the principles of equal opportunity in respect of the recruitment and selection of employees.

5. To comply, as a minimum, with all applicable health & safety legislation and continually improve stewardship towards best industry practice.
6. To comply, as a minimum, with all applicable environmental legislation and support a proactive approach to environmental challenges.
7. To comply with all relevant anti-bribery and anti-corruption legislation in respect of their dealings with CRH.
8. To comply with the OECD guidance as well as Section 1502 of the Dodd-Frank Act which aims to prevent the use of minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or in adjoining countries ("conflict minerals").

The above requirements where relevant and practical will be incorporated into new or renewed supply contracts which may include additional clauses and reference other specific laws and regulations as required.

## ADDITIONAL ASSURANCE PROCEDURES

### Higher Risk Suppliers

Suppliers who we deem to have a higher potential CSR risk because of the value of their contract with CRH, the location of the source of supply or some other risk factor, may be required to certify compliance with this Code (see Appendix I) and to complete a self-assessment CSR questionnaire (see Appendix II). They may also be asked to accept additional investigations, site visits or a full CSR audit. If such enquiries are satisfactory, the Supplier may be engaged, using a standard contract which incorporates the CSR conditions referred to above. If the requirements are not met, a remediation plan should be put in place over an agreed time frame and progress monitored. Otherwise, the Supplier may not be able to continue dealing with CRH. We will offer as much help in such circumstances as is practical.

### Conflict Mineral Suppliers

CRH has designed its conflict minerals reporting efforts to align and comply with Dodd-Frank's conflict minerals reporting rules and expects suppliers to do the same. We require that all suppliers (who provide products or components to CRH that contain

\*Our Code of Business Conduct may be downloaded from: [www.crh.com/our-group/corporate-governance/codeofconduct](http://www.crh.com/our-group/corporate-governance/codeofconduct)

conflict minerals) complete annual surveys regarding the country of origin of any conflict minerals contained in such products or components. We require that all suppliers agree to cooperate with CRH in connection with any due diligence that CRH chooses to perform with respect to its country of origin inquiries. In addition, we require suppliers, when CRH deems it necessary, to provide reasonable proof of the due diligence performed to support the country of origin certification to CRH.

### Other Suppliers

We expect all other suppliers to adhere to the principles set out in this Code. For key suppliers we would also expect that they would have similar requirements in place for their upstream supply chains and to exercise diligence in verifying their suppliers' compliance. We may ask them to demonstrate that this is the case (using the format set out in Appendix III) and also request them to accept additional investigations, site visits or a full CSR audit in order to provide required levels of assurance with the standards prescribed.

### CODE VIOLATIONS, REPORTING AND REVIEW

Please note that CRH may terminate a contract with a Supplier who violates this Code or refuses, if asked, to take part in a remediation plan. Likewise CRH will also exclude from any tendering process Suppliers who do not show high ethical and CSR standards or compliance with relevant laws.

We strongly encourage any ethical or legal misconduct or violations of this code to be reported by either the relevant CRH business or the Supplier using our 'hotline' facility. This may be found at [www.crhhotline.com](http://www.crhhotline.com) or alternatively by phone. The numbers for this 24/7 multi-lingual service are available to download at <http://www.crh.com/our-group/corporate-governance/code-of-conduct>.

Only if we uphold these high ethical and CSR standards, can we safeguard our excellent reputation and ensure our shared, continued success. We will constantly monitor the operation of this Code and make further improvements where we believe this can lead to even better practice.

We look forward to doing business with you and together leading an ethical and responsible supply chain.

For further information regarding this Code please contact:

#### Europe:

Heavyside/Lightside:	John McKeon	<a href="mailto:jmckeon@crh.com">jmckeon@crh.com</a>
Distribution:	Richard Piekar	<a href="mailto:rpiekar@crh-eur.nl">rpiekar@crh-eur.nl</a>

#### USA:

Oldcastle Materials:	Deron Banke	<a href="mailto:deron.banke@oldcastlematerials.com">deron.banke@oldcastlematerials.com</a>
Oldcastle Building Products:	Bill Braswell	<a href="mailto:bill.braswell@oldcastle.com">bill.braswell@oldcastle.com</a>
Allied Building Products:	Tim Williams	<a href="mailto:tim.williams@alliedbuilding.com">tim.williams@alliedbuilding.com</a>

For more information on the CRH Compliance & Ethics programme please contact the Head of Group Compliance & Ethics.

# Appendix I CRH Supplier Code Of Conduct Acknowledgement: Higher Risk Suppliers

---

To: (CRH procurement contact)

We confirm:

- our understanding of and compliance with the requirements set out in this CRH Supplier Code of Conduct
- and our adherence to good ethical practices as set out in the CRH Code of Business Conduct in respect of all our dealings with CRH group companies.

We have completed and attached the supporting CSR questionnaire in Appendix II. We understand we may be asked to accept additional investigations, site visits or a full CSR audit in order to provide required levels of assurance with the standards prescribed.

\_\_\_\_\_ (Name of Supplier/Agent Company)

\_\_\_\_\_ (Name of Supplier/Agent Signatory)

\_\_\_\_\_ (Job title of Supplier/Agent Signatory)

\_\_\_\_\_ (Signature)

\_\_\_\_\_ (Supplier/Agent Company Address)

\_\_\_\_\_

\_\_\_\_\_ (Date (DD/MM/YY))

# Appendix II CRH Supplier Code of Conduct Questionnaire: Higher Risk Suppliers

COMPANY DETAILS	Company Name		
	Address		
	CEO/Managing Director		
	Type of Business		
	Telephone		
	Fax		
	E-mail		
	Website		
KEY EMPLOYEE STATISTICS	Number of employees		
	Minimum age requirement		
	Average age		
	Gender balance	Male	
		Female	
Average weekly working hours per employee			
CSR POLICY	Does the company have a CSR policy? If so, please attach a copy.		
	Does the company have any relevant certifications in relation to CSR? If so, please attach a copy.		
HUMAN RIGHTS	Does the company have a human rights policy or statement, and if so, is this policy/statement actively communicated internally within the organisation, and externally to entities with which the company has a contractual relationship? Please attach a copy.		
	Is the company involved in forced or compulsory labour?		
	Does the company employ child labour?		
	Are there any barriers to freedom of association or collective bargaining in place?		
	If local law prohibits freedom of association or collective bargaining, what arrangements are in place for the facilitation of these?		
	Does the company discriminate on the basis of age, gender, disability, creed, language, political or other opinion, race or skin colour, national or social origin, association with a national or ethnic minority, sexual orientation or other status?		
	Is the company involved in corporal punishment, mental or physical coercion or verbal abuse?		
	Do wages paid for a standard work week meet national legal and industry standards?		
	Does the company provide just and favourable conditions of work, just and favourable remuneration for work done and equal pay for equal work?		

<b>CONFLICT MINERALS</b>	Does the company provide products or components to CRH that contain 'Conflict Minerals' (gold, tantalum, tin or tungsten)? If so, where do these minerals originate (country where they are mined or smelter where they are refined)?	
<b>HEALTH AND SAFETY</b>	Does the company have a health and safety policy or statement, and if so, is this policy/statement actively communicated or displayed internally within the organisation, and externally to entities with which the company has a contractual relationship? Please attach a copy.	
	Does the company comply with local legislation in respect of health, safety and welfare at work?	
	Does the company have OHSAS 18001 accreditation? If so, please attach a copy.	
	Does the company provide a safe and healthy work environment?	
	Are the significant health and safety risks of the business identified, and are risk assessments carried out where necessary?	
	Have employees received health and safety training?	
	Has the company had any legal actions or convictions for breaches of health and safety legislation in the past 3 years?	
	Has the company had any fatalities in the last 3 years? If so, please give details.	
<b>ENVIRONMENT</b>	Does the company have an environmental policy? If so, please attach a copy.	
	Does the company comply with local and international environmental legislation?	
	Does the company have ISO 14001 accreditation? If so, please attach a copy.	
	Are the significant environmental impacts of the business measured and controlled, and are environmental impact assessments carried out where necessary?	
	Have employees received environmental training?	
	Has the company had any significant environmental incidents in the past 3 years?	
<b>QUALITY</b>	Does the company have a quality policy? If so, please attach a copy.	
	Does the company have ISO 9001 accreditation? If so, please attach a copy.	
	Is there an appointed person with responsibility for quality?	
	Are quality related continuous improvement targets set and delivered?	
	Have employees received quality training?	
<b>ANTI-BRIBERY &amp; CORRUPTION</b>	Does the company have an anti-bribery & corruption policy? If so, please attach a copy.	
	Does the company comply with all relevant local and international anti-bribery & anti-corruption legislation?	
	Has the company ever been sanctioned for any bribery or corruption offence? If so, please give details.	

# Appendix III CRH Supplier Code of Conduct

## Acknowledgement: Other Suppliers

---

To: (CRH procurement contact)

We confirm:

- our understanding of and compliance with the requirements set out in this CRH Supplier Code of Conduct
- and our adherence to good ethical practices as set out in the CRH Code of Business Conduct in respect of all of our dealings with CRH group companies.

We understand we may be asked to accept additional investigations, site visits or a full CSR audit in order to provide required levels of assurance with the standards prescribed.

\_\_\_\_\_ (Name of Supplier/Agent Company)  
\_\_\_\_\_ (Name of Supplier/Agent Signatory)  
\_\_\_\_\_ (Job title of Supplier/Agent Signatory)  
\_\_\_\_\_ (Signature)  
\_\_\_\_\_ (Supplier/Agent Company Address)  
\_\_\_\_\_ (Date (DD/MM/YY))