



Modern Slavery Act Transparency Statement 2018

This statement is made in compliance with the UK Modern Slavery Act 2015 on behalf of GCP Applied Technologies (UK) Limited and its subsidiaries (henceforth referred to as "GCP") and relates to the financial year ending December 31, 2018.

GCP's portfolio of construction products includes concrete and cement additives, building materials and technologies that ensure specified quality and enhance business productivity.

GCP acknowledges that there is a risk of slavery and human trafficking in every industry, and is aware that the construction industry is more at risk than others, due to its high demand for low-skilled, manual, low-wage work. As an example, a 2018 survey published by Focus on Labour Exploitation (FLEX), a London based charity working to end human trafficking for labor exploitation worldwide, found that at least one-third of London's European migrant population had done jobs for no pay and experienced verbal and physical abuse. GCP continues to be committed, wherever it operates, to ensuring the protection and advancement of Human Rights and human dignity. GCP is committed to the **Statement on Human Rights** of the GCP group of companies which documents the company's commitment to not using child or forced labor; to recognizing employees' freedom of association; and providing a safe workplace.

The **Business Ethics Policy** of the GCP group of companies affirms the company's commitment to comply with all applicable laws, maintain a respectful workplace and be governed by the highest level of business ethics. All employees, complete an annual prescribed Ethics training. GCP also provides a confidential hotline that employees, customers, vendors or other interested parties can use to anonymously report violations or express concerns regarding compliance with any of GCP's ethics policies.

As set out in the **Transparency in Supply Chain Disclosure** of the GCP group of companies, GCP expects its business partners to share their commitment to operating with the highest standards for business ethics, human rights, environmental protection and workers' rights. GCP requires that all third parties who provide products or services to GCP ("Suppliers") act in compliance with the **Supplier Code of Conduct** of the GCP group of companies ("Code of Conduct") and adopt practices that are consistent with it. In particular, the Code of Conduct requires that no form of forced or compulsory labor be used by GCP's Suppliers and that workers enjoy safe and healthy working conditions that meet or exceed applicable local standards and laws.

GCP requires that Suppliers with a minimum defined annual spend sign the Code of Conduct to affirm their commitment to meet these standards, or confirm in writing that the Supplier's own code of conduct meets or exceeds the standards set forth in the Code of Conduct. GCP encourages its Suppliers in turn to require their own Suppliers and contractors to adhere to the requirements and principles of the Code of Conduct in their operations. A Supplier's failure to meet these standards without correcting any breaches is grounds for GCP to terminate any contracts and transactions with that Supplier.



gcp applied technologies

GCP will continue to monitor and develop practices in respect of combatting slavery or human trafficking in its supply chain.

Andrew J. Kelly
Director
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