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This Statement was approved by the Board of Directors of CRH plc on 29 June 2022 and signed on behalf of the Board by Jim Mintern, Finance Director.

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Jim Mintern, Finance Director.

Introduction

This statement is made in compliance with Section 54(1) of the UK Modern Slavery Act 2015 and other applicable legislation*, and sets out the measures CRH and its subsidiaries (collectively "CRH" or the "Group") have taken during the financial year ending 31 December 2021 to ensure that slavery or human trafficking is not taking place within its own business or in any of its supply chains.

CRH believes that slavery, in all its forms, is unacceptable and that all CRH companies must do everything they can to prevent any form of slavery, human trafficking or any other unethical behaviour in their businesses and supply chains.

"

At CRH, we have a zero tolerance approach to all forms of modern slavery. We work with suppliers and customers who share our ethical standards.



2021 achievements



Training and raising awareness

Our Modern Slavery e-Learning module continues to educate key teams in modern slavery and the risks it poses to our business. The training details the key indicators of modern slavery across the supply chain and provides an overview of our policies, systems and processes in place to prevent such behaviour.

We have expanded our training to ensure our people are able to understand and respond to all human rights issues. We have recently concluded training with key teams around the implications of sanctions and policy decisions we have taken following the Russia-Ukraine conflict.



Know Your Supplier

Through our Supplier Code of Conduct (SCoC), we continue to operate our core supplier due diligence processes to increase visibility and insights into our suppliers.

This process captures a digital Supplier Code of Conduct acknowledgement and automated data points on financial health, sanctions screening and adverse media reports of suppliers in areas such as discrimination, workforce rights. human rights, workforce disputes and workforce health and safety issues.



Code of **Business Conduct**

Our Code of Business Conduct (CoBC) sets out standards of integrity and ethical conduct for our organisation. In 2021 we updated our CoBC, which is available on crh.com. Among the updates to the CoBC was the inclusion of the phrase, "It Begins with Me" in every section. This is meant to emphasise each employee's personal accountability in ensuring that we live up to our company values. Every CRH employee is required to acknowledge that they have received the CoBC and will abide by its principles.



Defining salient human rights issues

The risk to people's human rights can occur throughout the value chain.

Through our Human Rights Impact Assessment, which was updated in 2021, we identified the salient human rights issues relevant to our own operations, acquisitions and supply chain, communicating these to our stakeholders in a transparent way. We continue to develop and refine our approach to human rights due diligence to better understand our potential impacts.

Ongoing goals and targets



Ambition to have a culture of safety and wellness working towards zero harm. Our target of zero fatalities extends beyond our own employees to include contractors.



Expand the coverage of our Modern Slavery e-Learning module to more colleagues across our business.



Continue to use this annual statement to demonstrate progress and ensure we are fully transparent in our actions in the areas of human and labour rights (see page 7 for further details).



Expand coverage of our due diligence process and explore new ways of gaining intelligence and performance insights.



Continue to review human rights and modern slavery risks through our Enterprise Risk Management processes (see pages 32-35 in the CRH 2021 Annual Report, available on crh.com here).

Governance

The CRH Board of Directors is responsible for promoting the long-term sustainable success of CRH, ensuring that it makes a positive contribution to society while generating value for its shareholders. The Board has established the Safety, Environment & Social Responsibility (SESR) Board Committee to monitor developments related to sustainability and provide strategic direction, oversight and support to the Board on this important topic. In the area of procurement specifically, our Group Procurement Council oversees all aspects of purchasing strategy, policy, targets and objectives, and the global procurement team is supported by a Procurement Head of Sustainability, Innovation & Risk. In addition, the CRH Sustainability team facilitates reporting in all areas of sustainability. Our global Legal & Compliance team provides support to the foregoing in these responsibilities.

Expectations

Stakeholder expectations of businesses to respect human rights and address any adverse impacts have never been higher. We understand and support this expectation. In response, we continue to evolve and refine our approach to human rights due diligence to better understand our impacts and ensure we respect human rights across our value chain.

We are committed to respecting internationally recognised human rights – as set out in the International Bill of Human Rights and the International Labour Organisation's Core Labour Principles – across our operations and extended supply chain. We apply the UN Guiding Principles on Business and Human Rights across our operations and extended supply chain and are committed to building knowledge and awareness on human rights across our entire value chain.

CRH plc

In 2021, our global footprint spanned 28 countries and over 3,200 operating locations, serving customers across the building materials sector. Our operating companies manufacture and supply a range of integrated building materials, products and innovative solutions which can be found throughout the built environment.

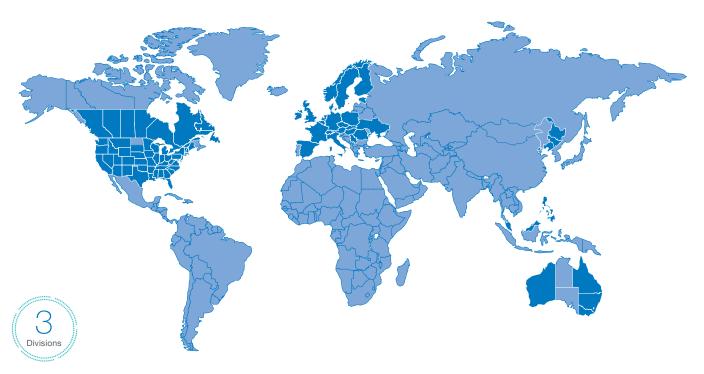
We procure a wide range of goods and services and have an annual procurement spend of c. \$16 billion, with 118,000 suppliers worldwide. Our core business lines each have a specific supply chain footprint with different characteristics, challenges and opportunities.

For further details of our global footprint refer to pages 3, 55 and 56 of our 2021 Sustainability Report here.



CRH at a glance

We are organised as three operating Divisions of scale comprising Americas Materials, Europe Materials and Building Products.



Products and services index



2021 Performance Highlights



Our policies

There are a number of key codes and policies that demonstrate our commitment to our values. These include:

Social Policy

The Social Policy is outlined in our 2021 Sustainability Report on page 67 (available on crh.com here) and requires all our Group companies to:



Comply at a minimum with all applicable legislation and continuously improve our social stewardship, aiming all the time to meet or exceed industry best practice standards.



Support freedom of association and recognise the right to collective bargaining.



Apply the principle of equal opportunity, valuing diversity regardless of age, gender, disability, creed, ethnic origin or sexual orientation, while insisting that merit is the ultimate basis for recruitment and selection decisions.



Manage our businesses in a fair and equitable manner, meeting all our social responsibilities including working conditions, as both a direct and indirect employer.



Ensure that we deal responsibly with our suppliers and customers in accordance with our Code of Business Conduct, Supplier Code of Conduct and proper business practice.



Prohibit forced, compulsory and child labour in all forms, including modern slavery.



Code of Business Conduct

Our Code of Business Conduct (CoBC) affirms our commitment to doing the right things in the right way, complying with the law, and working responsibly. Each section of the CoBC (updated in 2021) gives clear guidance to our workforce on how to live up to our value of leading with integrity. Our CoBC is available in 21 languages on crh.com here.



Supplier Code of Conduct

Our Supplier Code of Conduct (SCoC) sets out our expectations of suppliers in relation to safety and health, people and the community, environment, climate change, governance and compliance (available on crh.com here). It applies the concepts, principles and recommendations of the OECD Guidelines for Multinational Enterprises and other applicable legislation. SCoC requirements and acceptance is a founding principle in our standard contract clauses and terms and conditions of purchase.

Our suppliers must specifically undertake the following in relation to modern slavery:



Support and respect the protection of human rights within their areas of influence.



Prohibit all forms of modern slavery including forced labour, bonded labour, compulsory labour and child labour.



Support the principles of Equality, Fairness, Inclusion and Respect when dealing with the recruitment and selection of employees.



Respect freedom of association and the effective recognition of the right to collective bargaining by employees.

Our supply chain risks

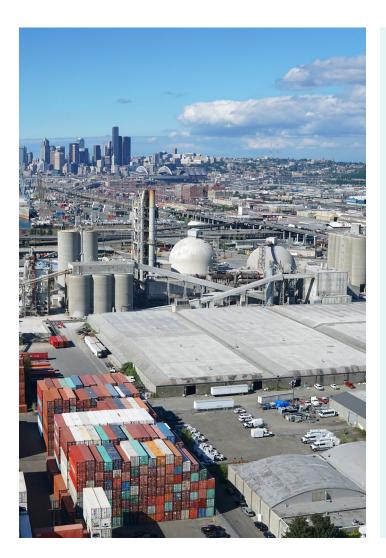
We assess the sustainability risks of our major areas of spend in line with ISO 20400 - Sustainable Procurement best practice. We use 12 assessment criteria that cover the critical areas that impact our supply chain, such as health and safety, human and labour rights, environment, climate change and governance.

Based on the risks identified and the outcomes of an accompanying opportunity assessment, we enhance our Category Strategy Plans to drive improvement actions at the point where we have most influence with our suppliers.

Country risk is a significant part of this assessment and the vast majority of our suppliers replicate our operational footprint with over 91% of our spend in North America and Europe. We are continually improving our spend visibility platforms to enhance country and location insights into suppliers in regions with a higher prevalence of modern slavery. This allows us to focus our resources on supplier activities that prevent any potential issues with modern slavery.

When specific issues are identified this approach enables us to put contractual clauses in place to manage supplier performance. We do this with human rights issues but also for environmental as well as health and safety issues.

We are continually improving our spend visibility platforms to enhance country and location insights into suppliers in regions with a higher prevalence of modern slavery



91% of our operational footprint spend is in North America and Europe

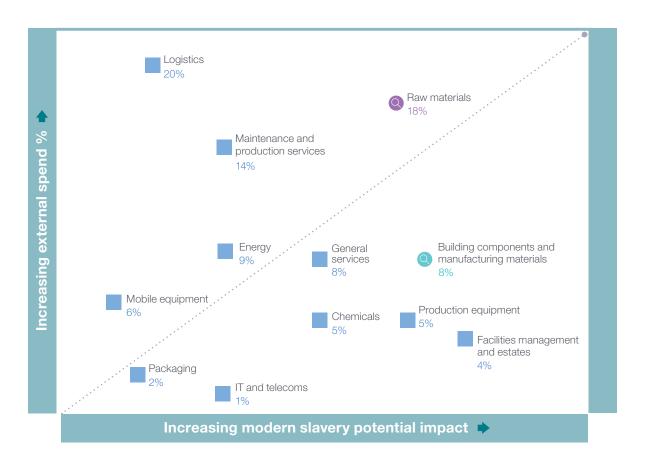
Our supply chain risks - continued

Sustainable procurement approach

Our sustainable procurement approach is to ensure our businesses are well-equipped to understand and manage responsible supply chains through:

- Our CRH Group Procurement Council overseeing all aspects of purchasing governance including strategy, policy, targets and objectives.
- Engagement with suppliers, governments, businesses and other partners to find new ways to innovate and create positive change, to transition towards more responsible supply chains across the entire industry.
- Assessing risk at a category level, in line with ISO 20400 - Sustainable Procurement best practice. Our procurement teams undertake a specific ESG risk assessment for all spend, of which labour practices is a core aspect.
- Identification of critical suppliers, assessed against specific sustainability issues, such as modern slavery.
- Assurance procedures in place to ensure that all CRH. companies are actively implementing the requirements of our SCoC.

Non-compliance by a supplier of the SCoC can have a number of consequences, including exclusion from any tendering process or termination of contract. However, our preference is to work with our suppliers to develop remediation plans for those affected, and build the capacity of suppliers to ensure these issues are properly managed on an ongoing basis.





Building components and manufacturing materials - Sometimes sourced in low-cost countries through our Global Direct Sourcing team. See page 12 to see how we manage this risk.



Raw materials - We continue to engage in industry partnership schemes to understand and lead standards in this area. See page 14 for details.

Assessing and managing risk

Enterprise Risk Management plays a critical role in how we respond to a world of increasing uncertainty. Our approach to risk management is integrated into our business and allows us to make appropriate decisions, drives increased performance and provides a robust foundation for the identification and assessment of material sustainability threats and opportunities.



Together with our Enterprise Risk Management assessment we conduct an annual review of social performance across our operations. We have participated in targeted risk workshops with the WBCSD to assess our approach to human rights and enterprise risk management. Through this review and our due diligence work we have highlighted four human rights areas including:



Safety of those working for CRH

We believe everyone has the right to a safe and healthy workplace. We manage safety across our operations, working towards our ambition of zero harm.

Our actions

- Implement the CRH Life Saving Rules
- Employee and contractor engagement
- COVID-19 mitigation plans
- Protection of employees during conflict

Stakeholders



Pool Health of communities living close to our materials activities sites

CRH aims to use our reach and influence to positively impact our local communities.

Our actions

- All relevant materials activities have a Community Engagement Plan in place at their sites
- Invest in community relations and development

Stakeholders

Stakeholders index







Salient Human Rights Issues









Employment conditions of those working for CRH

At CRH we are committed to creating a culture where everyone feels respected, valued and treated fairly.

Our actions

- Focus on Inclusion & Diversity (I&D) by SESR Committee and I&D Council
- Fair remuneration and equal opportunity
- Monitoring of employee and contractor working conditions through Annual Review process
- Group-wide organisational health survey

Stakeholders





Labour rights of those working in our extended supply chain

We expect our 118,000 suppliers worldwide to match our unwavering commitment to good ethical practices. We work with suppliers through our sustainable development programme to promote human rights.

Our actions

- Category level assessments in line with ISO 20400
- Review labour practices annually
- CRH Hotline available

Stakeholders











Contractors













Partners

Case studies



Safeguarding our employees in Ukraine

The safety and security of our 800 employees in Ukraine is the number one priority for CRH and we are providing support and assistance to our people and their families. This includes relocating people to safer areas of the country and helping those who have taken the decision to leave the country to do so safely. We have dedicated support teams in place, both in Ukraine and in neighbouring countries, and we continue to work with all involved as the situation evolves. In addition, CRH has partnered with UNICEF and, together with donations from across our global business, we are supporting the humanitarian aid programme in Ukraine.

CRH is committed to respecting internationally recognised human rights, as set out in the International Bill of Human Rights and the International Labour Organisation's Core Labour Principles, across our operations and extended supply chain. We continue to develop and refine our approach to human rights due diligence and we are committed to operating in a manner consistent with the UN Guiding Principles on Business and Human Rights.





Championing mental wellbeing

We are committed to fostering an inclusive working environment that supports our people at all times. Data from the Centers for Disease Control and Prevention (CDC) in the US has identified the construction sector as having one of the higher suicide rates among workers, highlighting the need for the industry to work with employees to help protect their wellbeing, including their mental health.

To promote the importance of mental health across our businesses, operating companies are providing mental health support services for employees to help address any issues they or their colleagues, friends or family may be having. Our frontline leadership programme – being delivered to 10,000 employees globally – includes modules on championing mental wellbeing in the workplace. In 2021, 99% of operating companies had health and wellbeing programmes in place.

For example, Farrans and Northstone, part of our Europe Materials Division in Northern Ireland, is a Business Champion of 'Mates in Mind', a charity set up to encourage discussion about mental health in the construction industry. Through this partnership, Farrans and Northstone have rolled out a training programme for employees and key managers to raise awareness of mental health issues. This training is also offered to all partners including clients and sub-contractors to help raise awareness within the industry. Like many of our other operating companies, support is also provided through the Employee Assistance Programme (EAP), a free, confidential, independent helpline offering advice and support that is available to all employees and immediate family.



Case studies - continued



Developing community engagement

We aim to use our reach and influence to positively impact our local communities. We have set out a clear target that 100% of companies will have Community Engagement Plans in place by 2030. Our operating companies are developing these plans in collaboration with those communities living closest to our locations.

For example, Callanan Industries, part of our Americas Materials Division, faced a challenge with rockslides on its East Kingston property in New York which had the potential to impact the local community. These rockslides were a historical issue caused by the collapse of abandoned cement mines from the 1890s.

To ensure the safety of the local community, Callanan Industries worked closely with local government engineers, geo-tech consulting firms and the Department of Environmental Conservation to mitigate the risks. As part of ongoing engagement, a community outreach session was held at the local townhall and, through this collaboration, safety radar devices were employed to monitor any rock movement and a 300-foot landslide protection wall was constructed to protect the community against potential rock falls. In addition, Callanan Industries installed a new bus stop for children to wait for the school bus and planted 150 trees behind the wall to replace any vegetation lost during construction.

In recognition of its continued efforts to engage with the local community, Callanan Industries was named winner of the National Award for Community Involvement by the National Asphalt Pavement Association.





Supply chain Ethical Labour standard

Tarmac, part of our Europe Materials Division, is the UK's leading building materials and construction solutions business and has been verified under BES 6002, the Ethical Labour Sourcing (ELS) standard, which was developed by the Building Research Establishment (BRE) in response to the 2015 Modern Slavery Act.

The ELS standard aims to verify companies that are applying due diligence around human rights and ethical concerns when sourcing materials, products and services, including labour, and which are actively identifying and working towards eradicating the exploitation of vulnerable workers.

BRE's ethical sourcing standard assesses organisations across 12 areas, including management structure and systems, learning and development, bribery and corruption, procurement and supply chain management.







Internal due diligence

We carry out a comprehensive annual Social Review of all our operating companies, as well as, where possible, associates and joint ventures. A key objective of this Social Review is to verify the implementation of the CRH Social Policy and to review performance against our salient human rights issues.

Measuring effectiveness and year-on-year progress

We conduct an annual Social Review covering all of our operating companies' performance, relating to over 50 human rights criteria. The Review covers areas such as policy implementation, safety, diversity, discrimination, freedom of association, forced labour, and fair payment, Performance data is also collected on employee development across different categories and types, including employee training, career development and employee engagement. The results of the Social Review are included in the report to the SESR Committee.

As part of our Social Review, a human rights assessment is conducted annually. In addition, our operating companies also complete individual human rights assessments and have systems in place to ensure compliance with human rights best practices. Where issues are identified, mitigation plans are put in place to ensure steps are taken to bring these companies up to CRH best practices within a specific time frame.



Outcomes

In 2021, we found zero cases of forced or compulsory labour and no employees or contractors under the relevant legal age working at any location among our businesses (zero cases reported in 2020). The Social Review also found that all migrant workers have similar legal protection to other employees and all companies permit trade unions, with 20% of CRH employees being members of trade unions (22% in 2020).

Labour practices

We embrace and comply with local wage and working time laws. Our operating companies offer entry-level wages at or above the minimum wage, with companies having policies in place to ensure a living wage.

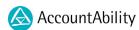
Policies or procedures are in place at our operating companies to prevent excessive working hours.



Due diligence processes

Human rights due diligence is completed across our value chain, including our suppliers, our operations and all CRH acquisitions. Where deficiencies are identified, for example in Health and Safety standards, improvement plans are put in place together with the relevant investment needed to ensure the safety of employees, contractors and the communities where we operate.

Across the Group in 2021 there were 20 bolt-on acquisitions. Through our due diligence and Health and Safety audit programmes, specific plans were put in place to improve Health and Safety standards as required. Issues identified included aligning processes to the CRH Life Saving Rules, installation and updating machine guarding, access to heights and pedestrian vehicle segregation. These remediation plans help progress our ambition to have a culture of safety and wellness working towards zero harm across all companies at CRH. The performance of these companies is tracked through the Annual Review process, with 100% of these acquisitions reporting performance in 2021.



As part of our Sustainability reporting, CRH's approach to stakeholder engagement is reviewed as part of an independent assurance process for adherence to the AA1000 AccountAbility principles of inclusivity, materiality, responsiveness and impact.

External due diligence

Measuring effectiveness and year-on-year progress

We monitor compliance with our human and labour rights policies in relation to issues, such as modern slavery, across all CRH companies and review labour practices annually. Within our supply chain, we increase our assurance and due diligence response in accordance to the risk we identify for the spend area. Methods we prescribe in our SCoC include:

3rd party desktop audit

an industry standard.

Independent review of data

submissions from suppliers to

Due Diligence

Identify and assess human rights across vulnerable groups, including forced labour, child labour, freedom of association, equal pay, discrimination

Where issues arise. put in place mitigation plans to remediate and prevent reoccurrences

Monitor through audits, CRH 24/7 Hotline. engagements, trade association network

Communicate internally and externally to promote best practice and prevent human rights abuses

Category risk profile

Know Your Supplier

Acknowledgement of CRH SCoC and Application Programming Interface (API) links to key external data points to identify any sanctions implications, financial health, adverse media or prosecutions of companies.



credit**safe**

dun & bradstreet







3rd party onsite audit

Partners providing audit and improvement plans as part of supplier site visits.

Industry partnership schemes

For specific commodities we partner and collaborate with organisations dedicated to improving standards across industry sectors.

















Global direct sourcing audit summary

Like most international businesses we source goods and materials from best value countries. The human rights and modern slavery risks within these countries vary and our Global Direct Sourcing (GDS) team, based in Shanghai, work to ensure that all of these suppliers meet our expectations.

The key categories of spend that utilise GDS are manufacturing materials, building components and production equipment. Often this spend occurs in countries that pose a higher risk profile in terms of modern slavery and human rights issues.

Following initial CRH site visits to set out our expectations and codes of conduct, we work with our audit partner TÜV Rheinland who carries out an onsite assessment of supplier operations and factories.

Only on successful completion of this audit and the closure of any critical gaps do we enter contracts and place any orders with suppliers.

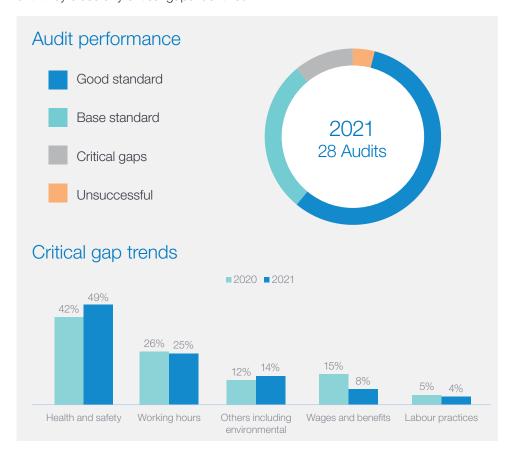


We have seen several issues raised in these assessments. We believe that modern slavery is not in place, however we have identified some concerns that, if left unchecked, could create the opportunity for modern slavery to occur. For any critical gaps we identify, we ensure that a corrective action plan is delivered and implemented and re-checked through secondary visits or spot checks.

Discrepancies in wage records and processes being in place is a common issue we are keen to deep dive into. We ensure that the audited suppliers are able to demonstrate that people are being paid fairly for their work and have suspended suppliers in the past who have been found to be holding deposits from employees for onsite accommodation (a potential bonded labour indicator).

We intervene in all cases with critical gaps and we recognise the need to continue engagement and management of both successful and unsuccessful suppliers to build and improve capabilities and processes, as well as our own understanding. We believe that ensuring suppliers meet our standards before placing any orders provides us with the best leverage to make an impact on these issues.

In 2021, we undertook 28 third party onsite assessments. COVID-19 restrictions in China remain restrictive and our ability to fully visit and engage with suppliers is not yet back to its pre-pandemic levels. However, we have maintained our supplier relationships and interactions virtually during this time and look forward to returning to normal procedures when it is safe to do so. We grade the results to help our teams and suppliers better understand their performance. We do not work with suppliers until they close any critical gaps identified.



Conflict minerals reporting

CRH is committed to responsibly sourcing all its products and raw materials, as outlined in the SCoC and in-line with applicable legislation*. Our objective is to ensure that our direct suppliers are not using tin, tungsten, tantalum and gold (3TG) minerals from sources that directly or in-directly finance or benefit armed groups in Conflict-Affected and High-Risk Areas (CAHRAs).

In line with the SCoC and our Sustainable Procurement processes, we consider this aspect in the purchase of float glass, as tin is involved in its manufacture. For example, our Oldcastle BuildingEnvelope®** business is a leading integrated supplier of products specified to close the building envelope, including architectural glass, storefront systems, custom engineered curtain and window walls, architectural glazing systems and related hardware. Float glass is used in the manufacture of some of these glazing products.

Assessment of conflict minerals in our supply chain

Due diligence and mitigation measures we have in place to develop a conflict-free supply chain include:

- Continuous inquiries across our business to ensure we have appropriately identified and assessed the risk relating to the use of 3TG in the Group's products.
- Identified three direct glass suppliers which provided the country of origin details of their smelters. We have procedures in place to assess our suppliers' responses to our queries and these together with smelter listings remain under review.
- Engaging with our direct glass suppliers to confirm that a conflict minerals policy is in place and they undertake due diligence in their upstream supply chain. Suppliers must also confirm corrective action management processes are in place.

Of the information provided to CRH, it is estimated that there are 32 smelters and refiners in our supply chain. All of these smelters and refiners have successfully completed an assessment against the applicable RMAP (Responsible Minerals Assurance Process) standard or an equivalent cross-recognised assessment.





U.S. Dodd Frank Act requires U.S. publiclylisted companies to check their supply chains for tin, tungsten, tantalum and gold, if they might originate in Congo or its neighbours, take steps to address any risks they find, and to report on their efforts every year to the U.S. Securities and Exchange Commission (SEC).



*The EU Conflict Minerals Regulations require importers to establish strong company management systems, identify and assess risk in their supply chains, design and implement a strategy to respond to identified risks, carry out an independent third-party audit of supply chain due diligence and report annually on supply chain due diligence.

Case study



Demonstrating performance throughout the value chain

Concrete is the world's most widely used building material. We continue to demonstrate the sustainability credentials of our products to our clients and customers by achieving responsible sourcing certification of our products.

Increasingly our customers are looking to us to provide solutions and insights into our shared responsible supply chains. To tackle this, CRH continues its active membership of the Concrete Sustainability Council (CSC). As a founding member, CRH works to bring together major players and stakeholders across the industry to develop a global responsible sourcing certification system for concrete and its direct industry supply chain. In addition to CSC, BES 6001 is a dominant standard in many markets.

Ethical labour and business practices are a key element of both schemes. CSC and BES 6001 are aligned and provide credits to the major building sustainability certification schemes BREAMM® and LEED®.



















Training

All policies are available online for employees and the CoBC and SCoC can be downloaded from <u>crh.com</u>. All in-scope employees are trained annually in the CoBC and the training is available in 21 languages.

Procurement teams are continuously trained in responsible sourcing issues, tools and techniques. In 2021, we continued to roll out Modern Slavery e-Learning across the Group. This training was developed to increase employee awareness of the potential of modern slavery to occur and the steps to take to report any issues that can help stop modern slavery. We also provided updated training in key sustainability areas including climate change and Inclusion & Diversity, as well as specialised training on the economic sanctions on Russia. This training forms a key part of meeting our target of 95% of employees receiving training in the reporting year.

At CRH, we take a holistic approach to training. Our front line leadership and senior management development programmes include strategic modules covering the spectrum of human rights issues, including health and safety, developing an inclusive workplace and leading with integrity. We are working to ensure our commitment to human rights is integrated into all levels of the business.





Speak Up process

To ensure a strong "Speak Up" culture at CRH, we provide an independent, confidential way to report concerns through a "Hotline" facility. The Hotline is hosted by a third party, is available 24/7, offers multi-lingual services, and allows for anonymous reporting. The CRH Hotline is available for employees, customers, suppliers and other external stakeholders to raise any good faith concerns they may have related to compliance with our CoBC or other CRH policies or possible violations of local laws. CRH investigates all reported concerns and takes appropriate action in response to investigation findings.

In 2021, a total of 290 concerns were raised globally and 19 proven incidents resulted in disciplinary action. For more information see pages 61-62 in the CRH 2021 Sustainability Report, available on crh.com here).

CRH does not tolerate retaliation and is committed to ensuring that anyone reporting a reasonably-held concern will not be negatively treated. In addition, an employee suspected of retaliation against a person who has reported a concern will be investigated in accordance with disciplinary procedures.

CRH encourages employees and partners within its supply chain to also "Speak Up"



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