



## **MODERN SLAVERY ACT STATEMENT**

This statement sets out All Steels Trading Ltd's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains.

This statement relates to actions/activities during the financial year 1st January 2017 to 31st December 2017.

As part of the global steel trading industry, All Steels Trading Ltd recognises that it has a responsibility to take a robust approach to slavery and human trafficking. Our organisation is committed to preventing slavery and human trafficking in our commercial activities, and to ensuring that our supply chains are free from slavery and human trafficking.

### **Organisational Structure and Supply Chains**

This statement covers the activities of All Steels Trading Ltd:

- All Steels Trading Ltd operates as a bulk trader of a wide range of both long and flat rolled steel products and combines this service with a huge offering of dockside stock for delivery in 48 hours from order. Our company also provides a unique skill in being able to source and potentially supply niche market products for customers throughout the world.

### ***Regions of Operation and Supply***

All Steels Trading Ltd currently operates in the following regions:

- Europe and Turkey are the organisation's two key global regions where we engage in both the buying and selling of long and flat rolled steel products.

All Steels Trading Ltd works with a range of steel suppliers including:

- European & Turkish steel manufacturers, steel stockholders & steel consumers. As a bulk international steel trader we buy long and flat rolled steel products in significant quantities directly from quality assured steel manufacturers and subsequently sell such products in significantly smaller batches to reputable steel stockholders and steel consumers.

The following is the process by which we assess whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

December 2018

- The organisation has undertaken an exercise to identify where we feel modern slavery and human trafficking could most likely occur in our business.

We have identified our key risk to be the following: The purchase of long and flat rolled steel products from steel manufacturers operating in countries where protection against breaches of human rights are generally considered to be relatively limited. We have sought to eradicate any such risk using pragmatic and reasonable solutions.

However, we understand that preventing modern slavery and human trafficking will be an ongoing process and our organisation will endeavour to reduce the risk of this being present in our supply chain year on year.

## **Responsibility**

Responsibility for the business's anti-slavery initiatives is as follows:

- **Policies:** The Managing Director of All Steels Trading Ltd assumes responsibility for putting in place and reviewing policies and the process by which they are developed.
- **Risk Assessments:** To minimise the risk presented by the purchase of long and flat rolled steel products we have taken steps to investigate all suppliers, as described below. We are also reviewing their procurement process to include a request for suppliers to provide their policies on modern slavery and human trafficking before they are placed on our organisation's approved supplier list.
- **Investigations/Due Diligence:** The Managing Director of All Steels Trading Ltd assumes responsibility for carrying out supplier checks/investigations and due diligence in relation to checking for/suspected instances of slavery and human trafficking.
- **Training:** To ensure a high level of understanding the organisation's Directors have collaborated with external legal advisors who provided the organisation with an overview of the Modern Slavery Act and advice on the next steps. Other colleagues have also received associated training via appropriate in-house collaboration/tutorials.

## **Relevant Policies**

All Steels Trading Ltd operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy** All Steels Trading Ltd encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. All Steels Trading Ltd's whistleblowing procedure is designed to make it easy for employees, customers or others to make disclosures, without fear of retaliation. A copy of the organisation's Whistleblowing Policy is readily available to all employees (this policy is conveniently housed within the organisation's widely distributed Staff Handbook) but the policy can also be made readily available to any customers or others by virtue of a simple oral request made to the organisation's 'Designated Whistleblowing Officer' ie the Finance Director.
- **Employee Code of Conduct** All Steels Trading Ltd's code makes clear to employees the actions and behaviour expected of them when representing the organisation. All Steels Trading Ltd strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. All Steels Trading Ltd is committed to providing a safe, healthy workplace which protects and respects the human rights of its own employees. To assist with our compliance we maintain and develop a comprehensive Staff Handbook a copy of which is routinely issued to all employees. This document clearly sets out our company's policies,

December 2018

including, amongst others, Equal Opportunities, Discipline and Grievance, Whistleblowing and Recruitment policies.

- **Supplier Code of Conduct** All Steels Trading Ltd is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. All Steels Trading Ltd works with suppliers to ensure that they meet the standards of the code and improve their employees' working conditions. However, serious violations of All Steels Trading Ltd's supplier code of conduct will lead to the termination of the business relationship. To implement the code of conduct in relation to slavery and human trafficking All Steels Trading Ltd requires all of our suppliers to complete and return a copy of our organisation's detailed questionnaire and all suppliers are subjected to routine on-site assessments by the organisation's Managing Director.

### **Due Diligence**

A supplier questionnaire has been sent to all of our major suppliers. We have considered all responses upon receipt and so far none of the responses have raised any cause for concern.

On a continuing basis we will raise enquiries with all new suppliers to satisfy ourselves that they have adequate provisions in place to prevent modern slavery and human trafficking.

### **Performance Indicators**

All Steels Trading Ltd has reviewed its key performance indicators in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- developing a system for supply chain verification expected to be securely in place by the 31st March 2017, whereby All Steels Trading Ltd evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains expected to be securely completed by the 31st March 2017, whereby All Steels Trading Ltd evaluates all existing suppliers.

### **Training**

All Steels Trading Ltd's modern slavery training for all colleagues covers the following elements:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and

December 2018

- what steps All Steels Trading Ltd should take if suppliers do not implement anti-slavery policies in high-risk scenarios, including their removal from our organisation's supply chains.

### **Awareness-raising Programme**

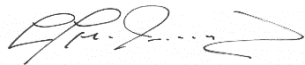
As well as providing tutorial based training for all colleagues, All Steels Trading Ltd has raised awareness of modern slavery issues by circulating an email to all members of the organisation. This email with its associated attached documents explained:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can/should do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

### **Approval**

This statement has been approved by All Steels Trading Ltd's Managing Director, who will review and update it annually.

### **Director's Signature:**



### **Director's Name:**

Laurence McDougall

### **Date:**

31st December 2018