Modern Slavery Statement 2024

Introduction

This Modern Slavery Statement relates to actions and activities during the financial year 1st January –31st December.

The statement sets out the Company's commitment to preventing slavery and human trafficking in our business activities, and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Employees are expected to report their concerns, and management to act upon them.

Organisational Structure

This statement covers the business activities of the Company, which are as follows:

Importers, exporters, distributors, manufacturers and stockholders of finished and unfinished metals, fittings and fasteners, industrial plastics and related and ancillary goods. Hauliers, freight forwarders, operation of trade counters, and property owners. Processes include, but are not limited to, acid cleaning, cutting, heat treating, forming, manufacturing, processing, polishing, coating and testing.

The Company operates predominantly in the UK. Suppliers from which material is purchased are based in the UK and worldwide, the majority of which are not considered to be at high risk of modern slavery or human trafficking. A register of such countries is maintained centrally and updated on an annual basis as part of our Bribery and Corruption audit.

High Risk Areas

The Company does not consider its activities to be at high risk of modern slavery or human trafficking.

Our Suppliers

The following are the ways the Company assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking:

An analysis of high-risk suppliers/countries is undertaken as part of the Company's anti-bribery and corruption audit.

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

- Policy: Morag Hale, Company Secretary, is responsible for creating and reviewing policies. The process by which policies are developed is by considering best practice, consulting with colleagues, and adapting to the needs of the Company.

- Service Centre Managers are responsible for completing the annual anti-bribery and corruption audit and bringing to the Company Secretary's attention any supplier or country that may be at risk in relation to modern slavery or human trafficking.

Training

Due to the fact that the industry in which we operate is considered low-risk in relation to modern slavery or human trafficking, no training has been undertaken other than making this Statement available to employees and suppliers. We do, however, review the requirement on an annual basis.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business, or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies strengthen our commitment to the practice of responsible corporate behavior:

- Whistleblowing policy
- Ethical Policy
- Environmental Policy

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering new suppliers, encourages long-standing relationships, and makes clear our commitment to responsible corporate behaviour in all business activities.

We would consider invoking sanctions against suppliers that fail to improve their performance in line with expected standards.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary.

This statement was approved by the Board of Directors on 1st January, 2024.

Signed: _____

Morag Hale, Company Secretary

Date: 1st January 2024