

## **Slavery and Human Trafficking Statement**

Darton Commodities (“DC”) provides metals and metallic raw materials to industry, with 7 employees in England and The Netherlands who are committed to operating in a responsible way. DC is committed to treating people with dignity and respect in the workplace and in the communities where we do business, as well as to the respect and protection of human rights.

### **Code of Conduct**

Since DC was founded in 2000, it has acted in the belief that doing the right thing sets the foundation for long term success. DC and its staff operate to the highest ethical and compliance standards for conducting business.

### **Operating responsible supply chains**

DC believes responsible supply chains must respect people and human rights, promote good practices, provide viable livelihoods and reduce environmental impacts. DC does not accept or support the use of illegal, abusive, enforced or child labour and abides by the laws in the countries it operates and often exceeds applicable local, state and national laws and regulations regarding employment and the employment of minors.

DC believes it is essential that all parties in the supply chain – industry, government and non-governmental organisations (NGOs) – work together to address this complex problem and support workers livelihoods, raise incomes and ensure children and adults are not subject to these conditions.

DC is a member of the London Metal Exchange, The Cobalt Institute and the Minor Metal Trade Association all of whom promote improvements in ethical and responsible business practices.

### **Raising grievances**

DC takes all reports of potential misconduct seriously and handle them promptly, fairly, and confidentially. Any grievance, complaint or concern from external parties and employees may be submitted anonymously to the Directors of the ultimate group holding company Darton Group Ltd. DC will not tolerate retaliation against anyone who, in good faith, raises a concern or participates in an investigation.

**This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Directors of Darton Group Ltd.**

**Roy Walton**  
**Director**  
**19 June 2020**