



**Davro Steel
Unit 9
Hayes Trading Estate
Hingley Road
Halesowen
West Midlands
B63 2RR**

Anti-slavery Policy

Introduction

This policy ensures that Davro Steel Limited complies with section 54 of the Modern Slavery Act 2015, and sets out the responsibilities for employers and employees.

Davro Steel Limited is committed to ensuring that all of its business operations are free from involvement with slavery or human trafficking.

This policy applies to all persons working for Davro Steel Limited and its subsidiaries, or acting on our behalf in any capacity, including directors, officers, employees, agency and part-time workers, contractors and external consultants. Any individual who fails to adhere to this policy may face disciplinary action, which could result in dismissal.

Annual statement

Davro Steel Limited will publish an annual slavery and human trafficking statement.

Greg Anthony is responsible for ensuring that this statement is published and reviewed on an annual basis.

The statement will explain the steps that Davro Steel has taken to ensure that slavery and trafficking are not taking place in any of its supply chains, or in any part of its own business.

Content of the statement

The following items will be included in the statement.

1. The structure of our organisation, the business operations of the organisation and the supply chains.
2. Our policies in relation to slavery and human trafficking.
3. The due diligence processes that we carry out to ensure that there is no slavery or human trafficking in our business and supply chains.

4. Identification of any parts of our business and supply chains where there is a risk of slavery or human trafficking taking place, and the steps that we have taken to assess and manage the risk.
5. A statement that training about slavery and human trafficking is available to all employees.

Additional action points

In addition to producing the annual statement, Davro Steel Limited is committed to:

- Ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility
- Ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure
- Carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK
- Ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act
- Appointing a named individual to oversee the compliance with the Modern Slavery Act 2015, Amelia Roberts
- Identifying and addressing any areas of high risk in our supply chain
- Providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.