MODERN SLAVERY POLICY STATEMENT

STATEMENT UNDER THE UNITED KINGDOM MODERN SLAVERY ACT, 2015

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Steel & Alloy Processing Limited part of Gonvarri Steel Industries (hereinafter `The Company´) is committed to driving out acts of modern day slavery and human trafficking within its business and supply chain, and expects the same from suppliers and partners.

Organisational structure

For further information on the Company, its business and operations please refer to the Company's website www.gonvarri.com

Human rights

Our approach to Human Rights (from various International Human Rights Declarations including the United Nations Declaration of Human Rights) is contained in all our related policies and focuses on human rights of our employees and local communities.

Our aim is also to extend our influence on our supply chain to share our commitment to improve social (including health and safety and human rights), environmental and ethical standards.

Main Policies in our Framework

Code of Business Conduct: Articulates the fundamental legal and ethical principles that guide our conduct. It also sets out our commitments to a work environment free of harassment and discrimination, promoting occupational health and safety and respecting the environment among all other Company´s principles.

Corporate Social Responsibility Policy: Articulates our commitment and respect for all human rights among other principles. The Company opposes the use of forced or compulsory labour, human trafficking and all forms of human rights violations known as 'modern slavery', within our own operations and through our supply chain.

Supplier Code of Conduct (hereinafter `The Code´): Sets out the expectations we have of our supply chain in relation to human rights, health and safety, the environment, to child labour and forced or compulsory labour and anti-corruption, among others**.**

Information is marked as General and belongs to Gonvarri Industries.

Identifying and Managing Risk

Conflict minerals: We extend the requirement of compliance with Conflict Minerals to our suppliers, focusing on steel suppliers.

Supply chain evaluation**:** All significant suppliers are required to accept our Code as part of our supplier approval process. We also review recurrently all core and strategic suppliers to verify their compliance with the Code and offer support suppliers in their efforts to comply if they do not meet our standards.

Reporting mechanisms**:** The Company operates a confidential and anonymous whistleblowing channel, available in our website, through which all stakeholders may report ethical concerns. Our Corporate Compliance Committee monitors the volume, type and response to such concerns.

Improvement: Management, along with the Corporate Compliance team, undertake review of Compliance Model to identify further areas or opportunities for continuous improvement.

Training

All employees are required to be trained and to refresh their knowledge on our Code of Business Conduct principles and main related policies.

All members in relevant roles also undertake training focused in specific areas, including Human rights and modern slavery among others, which is also to be refreshed recurrently.

When additional concerns are observed, specific training onsite might be provided

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risks we have conducted an assessment and will review this on an annual basis as part of our risk management processes.

Approval

This statement has been approved by the board of directors of Steel & Alloy Processing Limited at the Board meeting held on the 16th March 2022.

Signed on behalf of Steel & Alloy Processing Limited

Steel & Alloy Processing Limited
Paul Whitehouse – Managing Director

Information is marked as General and belongs to Gonvarri Industries.