

**1. POLICY STATEMENT**

- 1.1 This policy applies to UPTONSTEEL HOLDINGS LIMITED, C. J. UPTON (DEMERGECO) LIMITED, C.J. UPTON HOLDINGS LTD, C.J. UPTON & SONS LTD and BRANDVIK LIMITED. This Policy has been reviewed and approved by the Board of Directors.
- 1.2 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. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3 Our supply chains include the purchase of steel coils from world-renowned steel mills. As part of our initiative to identify and mitigate the risk we build and maintain long lasting relationships with these suppliers and other traders and clearly communicate our ethical conduct policies.
- 1.4 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.5 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.6 This policy does not form part of any employee's contract of employment and we may amend it at any time.

**2. RESPONSIBILITY FOR THE POLICY**

- 2.1 All employees and directors have responsibilities under this policy.

**3. COMPLIANCE WITH THE POLICY**

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify us as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the compliance manager as soon as reasonably possible.
- 3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform us immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in our Staff Handbook.

#### **4. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

- 4.1 The following systems have been put in place as part of our due diligence in order to prevent slavery and human trafficking. We shall
- 4.1.1 Where practical visit, or get a record of a visit by a trusted business partner, the steel mills that we purchase from either directly or indirectly;
  - 4.1.2 Purchase only from suppliers who employ anti-slavery, human trafficking and anti-corruption policies and processes;
  - 4.1.3 Explicitly make clear, through this policy, that anyone who wishes to raise a concern about this issue will be protected in line with our Whistleblowing and Grievance policies.
  - 4.1.4 Provide training to our staff about the risks of modern slavery and human trafficking in our supply chains and business. We provide training to all employees. We also require our business partners to provide suitable training to their staff, suppliers and providers.

#### **5. COMMUNICATION AND AWARENESS OF THIS POLICY**

- 5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 5.2 Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### **6. BREACHES OF THIS POLICY**

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

#### **7. FURTHER STEPS – YEARLY REVIEW**

- 7.1 Pursuant to the provisions of the Modern Slavery Act 2015 this constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2025.

**SIGNED TOM NEALE, MANAGING DIRECTOR OF UPTONSTEEL HOLDINGS, C. J. UPTON (DEMERGECO) LIMITED, C.J. UPTON HOLDINGS LTD, C.J. UPTON & SONS LIMITED AND BRANDVIK LIMITED. 02-01-25**