kloeckner metals

Your partner for a sustainable tomorrow

MODERN SLAVERY STATEMENT

FOR FINANCIAL YEAR ENDING DECEMBER 31, 2022

1. Introduction

Kloeckner Metals UK purchases goods and services from a wide range of suppliers across a number of categories and is committed to acquiring these in a responsible manner. Kloeckner Metals UK is not aware of any modern slavery activities within its operations or supply chain but if any were discovered then it would act immediately to ensure compliance with legislation and its own policies to prevent further abuse. Before becoming a registered supplier to Kloeckner Metals UK, all suppliers are expected to agree to comply with our Supplier Code of Conduct.

2. Organisation structure

Kloeckner Metals UK is one of the largest mill independent, multi-metal stockholder/distributors in the UK. We offer a diverse range of ferrous and non-ferrous products, sourced from reputable and accredited mill sources, as well as value added services. We operate in all major market sectors across the UK.

Kloeckner Metals UK is wholly owned by the Klöckner & Co group, one of the largest producer-independent distributors of steel and metal products and one of the leading steel service centre companies worldwide. Through its distribution and service network of around 140 locations in 13 countries, Klöckner & Co supplies around 100,000 customers.

3. Our supply chains

We have many suppliers in our supply chain providing goods and services to support the operational requirements of a global business. Our main suppliers are suppliers of metals, however, other categories of suppliers include IT services, cleaning, office supplies, logistics and HR services.

4. Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Company Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Before becoming a registered supplier to Kloeckner Metals UK, all suppliers are expected to agree to comply with our Supplier Code of Conduct or have their own equivalent Code of Conduct in place.

We aim to ensure that everyone who works for us and with us, is aware of the importance of and the promotion of fair and safe working conditions. We insist that everyone complies with the relevant elements of our Company Code of Conduct and Supplier Code of Conduct. Whilst our employees and partners must ensure that they meet our Code of Conduct requirements, we aim to promote high ethical standards without imposing unachievable conditions.

5. Due diligence processes for slavery and human trafficking

In our business activities, the potential for Modern Slavery arises from the import of metal from around the world.

This risk is mitigated by only using vetted and monitored suppliers who demonstrate compliance with the requirements of the Modern Slavery Act.

Unless the supplier operates in a high-risk country (in which case, more in depth screening takes place), the supplier will face automatic screening. This automatic screening may consider:

- Ethical standards;
- Labour standards;
- Health & safety;
- Human rights; and
- Environmental management

as appropriate.

After the screening, it is necessary to determine whether a questionnaire is required. Where a supplier presents a higher risk for modern slavery, we require a questionnaire to be undertaken to establish the risk and to conduct a more in-depth analysis.

Additionally, our Supplier Code of Conduct sets out the requirements for a supplier to adhere to the Modern Slavery Act 2015 and the behaviours and practices we expect of our suppliers. Our standard terms and conditions include a clause requiring all suppliers to comply with our Supplier Code of Conduct.

Furthermore, we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

6. Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a Supplier Code of Conduct that all suppliers must adhere to.

We have a dedicated compliance team, which consists of representatives from the following departments:

- Finance, Audit and Compliance
- Human resources
- Legal

7. Training

Kloeckner Metals UK employees undergo a program of training to raise awareness of a variety of compliance issues including slavery, human trafficking and human rights. The aim of the training is to promote compliance and equal rights within the workplace and across the wider community.

8. Let Us Know Policy and helpline

Our Let Us Know Policy encourages and outlines the process for the reporting of concerns. Employees and our Business partners can do this by informing our UK National Compliance Team in a confidential manner if so required. Furthermore, we provide an anonymous reporting channel, operated by an independent service provider via internet or telephone.

9. Our effectiveness in combating slavery and human trafficking

We carry out supplier visits and utilise KPIs to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains

10. Further steps

Following a review of the effectiveness of the steps we have taken to ensure that here is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Continue to regularly review and improve our supplier risk assessment processes
- Continue to educate and promote a “speak up” culture within our business, encouraging all of our employees and those working on our behalf to raise any concerns.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Kloeckner Metals UK’s slavery and human trafficking statement for the financial year ending 31st December 2022.



Peter Whiting, CEO

ASD Limited and ASD Westok Limited t/a Kloeckner Metals UK