



Slavery and Human Trafficking Statement
Financial Year 2025
7 Steel (UK) HOLDINGS LTD

Slavery and Human Trafficking Statement for the Financial Year 2025

The UK Modern Slavery Act 2015 requires certain businesses to publish a statement setting out the steps taken in the previous financial year to ensure that slavery and human trafficking is not taking place in their supply chains or own business. 7 Steel (UK) Holdings Ltd is obliged to publish such a statement.

ORGANISATION STRUCTURE AND SUPPLY CHAINS

This statement is made by the Company on behalf of itself and on behalf of its subsidiaries (together referred to as the “7 Steel (UK) Holdings Ltd (7 Steel)”) that are required to make a statement pursuant to the United Kingdom Modern Slavery Act, 2015.

These subsidiaries are –7 Steel Manufacturing (UK) Limited, BRC Ltd, ROM Group Ltd, 7 Steel Service (UK) Limited

7 Steel (UK) Holdings Ltd (7 Steel) is a major supplier of reinforcement and structural steel to the construction industry. 7 Steel collects scrap metals at its recycling hubs and recycles steel scrap by use of an Electric Arc Furnace (EAF), continuous casting of billets and hot rolling to produce reinforcing bar and steel sections. Additional recycling is achieved through mineral extraction/reuse of the furnace slag, and the supply of fabricated reinforcement. 7 Steel recognises its business’ impact and the part it has to play in maintaining high standards of business ethics.

POLICY

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. 7 Steel is employing tools that enable engagement with our Supply Chain partners to evaluate and highlight any potential risks and exposure in regard to Modern Slavery. 7 Steel’s Mission, Vision, Values and attitudes favour close collaboration with our supply chain in developing, implementing and enforcing effective and robust systems to highlight and safeguard against any potential risk of Modern Slavery.

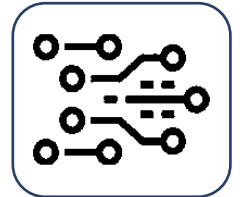
DUE DILIGENCE PROCESS

Our supply chains principally include the sourcing of raw material scrap ferrous metal. Respecting human rights and environmental issues in the supply chain is ultimately our suppliers’ responsibility. However, we understand that we play an active role in supplier development and clearly communicate our expectations to our suppliers. We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

RISK ASSESSMENT AND MANAGEMENT

As part of our initiative to identify and mitigate risk:

- We build long-standing relationships throughout our supply chain and our customers, communicating our expectation and aspirations in regard to ethical conduct.
- Our Supply Chain partners are expected to have suitable anti-slavery and human trafficking policies and procedures in place.
- The employee whistleblowing system allows for the reporting and identification of concerns relating to indicators of ILO breaches relating to forced labour.
- Our supply chain partners agrees to operate under our terms and conditions which includes clauses on modern slavery and comply with our audits.



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KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN

- Increase number of Modern Slavery Risk Assessments carried out on suppliers year on year.
- Increase working with only suppliers who have compliant policies and processes.

RESPONSIBLE SOURCING

Our standard terms require our suppliers to warrant that they adopt good ethical behaviour as well as apply with all applicable laws. 7 Steel's Responsible Sourcing Policy sets out the following principles which apply to the Slavery and Human Trafficking Statement:

- Ethics - Adopt and apply standards of ethical behaviour appropriate to our activities.
- Supply Chain Management - Engage with suppliers of our constituent materials to ensure, where practicable, they maintain management systems appropriate to the needs of our activities, including adherence to this policy.
- Fundamental Rights At Work - Operate within international norms concerning human rights and labour practices.
- Employment And Skills - Implement fair operating practices with regards to employment and economic activities, including development of a skilled and competent workforce.
- Contribution To The Built Environment - Aim to develop innovative & effective products that improve the quality and sustainability of the built environment.

Sustainability and Responsible Sourcing Certifications can be found at: <https://7-steeluk.com/environment-energy/>

TRAINING ON MODERN SLAVERY AND TRAFFICKING

This policy shall be communicated to all persons working for or on behalf of 7 Steel (including contractors) as part of the company wide training programme and made available to the public via the company website.

7 Steel's modern slavery statement is published within 6 months of the organisation's financial year end. 7 Steel's financial year end is 31st December.

This statement will be published annually on the subsidiary websites.



This statement is approved by:

Carles Rovira
CEO
May 2026



