MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

INTRODUCTION

In accordance with the Modern Slavery Act AJN Steelstock Ltd (the Company) will publish an annual Modern Slavery and Human Trafficking statement, this document. The statement will be approved and supported by the Company Director/s who will be responsible for ensuring it is reviewed and published on an annual basis. The statement will be published on the Company website.

DEFINITIONS

Modern Slavery is a term used to encapsulate both offences of the Modern Slavery Act (the Act), that being, slavery, servitude and forced or compulsory labour and human trafficking. The offences are set out in section 1 & 2 of the Act.

Slavery and Servitude: Slavery is the status or condition of a person depriving them of their freedom. The key element being the perceived ownership of one person by another. Servitude is the obligation to provide services that is imposed on someone including the obligation to live on another person's property without the possibility of change.

Forced or Compulsory Labour: work or services are exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily.

Human Trafficking: The arrangement or facilitating the travel of another person with a view to that person being violated or exploited, even if the person consents to the travel, representing the fact that the person may be deceived by the promise of a better life.

Modern Slavery: There are many different ways in which modern slavery can manifest itself and it is not always clear at which point the behaviour constitutes a crime. The crime will consider the exploitation of workers including human rights and international standards, working conditions, health and safety, working hours, pay and freedom of choice.

CONTENT OF THIS STATEMENT

The following items will be included in this 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. Our due diligence processes that will be carried out to ensure our compliance with the Act
4. Identification of any parts of our business or supply chain where there is a risk of slavery or human trafficking and the steps we have taken to manage that risk

5. An assessment of the effectiveness of the measures that we have taken to stop slavery and human trafficking taking place
6. The measures we will take if we discover an incidence of slavery or human trafficking.
7. A statement about the training we have made available in relation to this policy and its procedures.

Structure of the organisation

The organisation has two branches, a storage site and three additional satellite offices. All branches/offices are headed by the same board of directors and work under the same conditions and procedures. All departments have a manager, some managers cover all sites such as HR, Health and Safety, Quality, Purchasing and Operations. The company produces a Company Organagram and Roles and Responsibilities document as part of its Management Systems documentation.

The organisation purchases from both the UK and worldwide. The Purchasing Manager, Operations department, Quality Manager and Health and Safety department will be responsible for the selection of suppliers and their compliance with this policy where necessary.

Policy (Employees)

AJN Steelstock Ltd is committed to providing a safe, healthy workplace which protects and respects the human rights of its employees. To assist with our compliance, we have produced a Company Handbook which will be issued to all employees and reviewed on a regular basis. This is a comprehensive document which sets out our company policies, including, amongst others, Equal Opportunities, Discipline and Grievance, Whistleblowing, Worksafe, Health & Safety, Harassment and Bullying, Bribery and Recruitment policies. It will not form part of the employee's contract.

All employees will be issued with a written contract of service, within 13 weeks of the commencement of employment, which will contain the terms and conditions of their employment. All work must be voluntary and employees will be free to terminate their employment by giving the correct notice to the Company at any time.

All potential employees will be checked to ensure their eligibility to work in the UK. The Company will take copies of all ID produced. It will not keep or destroy any original documents, these must be handed back to the employee, unless the Company is required by law to hold permits to work. Any agency workers will be checked in the same manner and will be sourced from UK labour agencies only. The Company will comply with the Agency Workers Regulations in relation to all agency workers.

Supply Chain

AJN Steelstock Ltd encourages good working relationships with its supply chain. The Company is committed to working with suppliers that are compliant with the Modern Slavery Act and/or International standards of human rights.

All major suppliers of products and services will be verified using the Approved Supplier Questionnaire.

The questionnaire will include a section of questions including; establishing whether there is a need to publish a Modern Slavery Act statement, working conditions for employees, freedom to work, health and safety arrangements and the checks made on their supply chain and steps taken to eradicate slavery and human trafficking within their organisation and supply chain.

AJN Steelstock Ltd currently purchases from within the UK which is considered a low risk country but also sources from Europe and further afield which may present a higher risk. Extra care should be given when sourcing from countries which are considered at medium to high risk of slavery and human trafficking. As part of our due diligence process it should be considered when reviewing the responses to the questionnaire if any further steps such as auditing or further monitoring need to be carried out before approving them as a Supplier. Those that are considered a medium risk or above or have any changes to the structure of the company should be reviewed on a regular basis at intervals dependent on their risk level. The Purchasing and /or Operations department, together with the Quality Manager will be responsible for reviewing and approving suppliers.

Measures taken in the event of a breach

If it is alleged that a breach of this policy, The Modern Slavery Act or International Standards for slavery and Human Rights has been breached the Company will take timely action to investigate the alleged breach. If the allegations are founded actions will be taken to rectify the situation that was found to cause the breach. Policies will be reviewed and reissued to eradicate the failings and retraining will be given.

If the breach was found to be within our supply chain discussions with the supplier will be made to see if they are able to remedy the breach. If a remedy cannot be sort and the Company feels the behaviour is in breach of current legislation the Supplier will be removed from the Approved Supplier List and no further transactions will take place unless the supplier is re-approved as being compliant.

Training

All managers will receive a document outlining the requirements of the Modern Slavery Act and our Company statement, which is contained within the Employee Handbook. Any further training requirements will be provided should the need arise.

All employees are encouraged to report any concerns they may have regarding slavery and human trafficking and any breaches of this statement in line with our Whistleblowing Policy.

Review

The Company will review the effectiveness of this statement, its policies and procedures on an annual basis or upon any changes in legislation or Company circumstances that may affect the statement. Any amendments to this statement will reflect the review on its effectiveness.