

Modern Slavery And Human Trafficking Statement

At Island Steel UK Ltd we have and will continue to maintain a zero tolerance for modern slavery and human trafficking which we believe is abhorrent and should be erased. We are committed to taking all appropriate steps to ensure that no practices of slavery or human trafficking occur in any part of our business or our supply chain.

About Island Steel UK Ltd

Island Steel UK Ltd is an Independent family owned service centre conveniently situated on Newport docks and a major importer of steel into the UK. The company has been in business since 1995 and, drawing on many more years of experience within the steel industry, offers a friendly, flexible and professional service. Supplying all strip mill products in sheet and coil form, processing customers own materials to customers' full specifications, tolerance and packaging requirement.

Island Steel UK Ltd has branches in the Midlands in the UK and in Dublin in Ireland.

Island Steel UK Ltd is a member of International Steel Trade Association.

Island Steel UK Ltd is the only Steel Service Centre allowed on an ABP Port in the UK, which also has 24hr security.

Our business and supply chains

We source our core material predominantly through 20 regular suppliers of steel some who produce the material themselves, other are UK intermediaries or agents.

Our supply chains include third party IT service providers, insurers and insurance claims-related facilities management, and consultancy and professional firms specialising in such services as auditing, marketing, legal and HR and recruitment. We also use engineering, mechanical services and electrical firms, hauliers, transport and storage companies.

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. Following the implementation of the Modern Slavery Act 2015 (the "Act"), we intend to create a Island Steel UK Ltd Code of Business Conduct for Agents, Suppliers and Vendors (the "Code") to reflect 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.

We require all employees, and directors to comply with our Island Steel Handbook which outlines our commitment to ethics and proper business conduct. This is reinforced by policies and procedures including in relation to Anti-Bribery, Conflicts of Interest and Whistleblowing, which

encourage employees to report concerns about any conduct they consider to be inappropriate, illegal, unethical or fraudulent.

Our due diligence processes

We believe our business model represents a low risk of exposure to slavery and human trafficking, however, we are conducting a risk assessment of our business and supply chains.

We have taken no steps at present to prevent modern slavery from occurring in our business and supply chains. However, we have plans to start to take steps. We are creating a Procurement Policy which is designed to ensure we enter into supplier arrangements with appropriate levels of review, approval and continued oversight. Producers wishing to do business with Island Steel UK Ltd will be required to enter into written terms of business agreements which stipulate the obligations of each party. We will conduct regular audits of key suppliers and service providers. We have appointed a specific member of staff to monitor and coordinate this.

Our engagement

All directors have been briefed on the requirements of the Act. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide appropriate level of training to our staff. All employees at induction and at annual reviews will undertake relevant training, including in relation to Business Ethics and Whistleblowing. This statement will be communicated to all staff.

Our ongoing commitment

We will continue to evaluate the effectiveness of our policies and procedures in order to monitor and manage the risk of slavery and human trafficking in our business and supply chain. We will gather information from our suppliers during the procurement and audit processes regarding their awareness and adherence to the Act, and continue to ensure appropriate contractual provisions are in place in our supplier contracts.



Alex Roberts
Managing Director
1st January 2020