



MODERN SLAVERY ACT STATEMENT

This statement sets out Clarke Metal Services Ltd.'s actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains.

As part of the global steel trading industry, Clarke Metal Services Ltd recognizes that it has a responsibility to take a robust approach to slavery and human trafficking.

Our organization is committed to preventing slavery and human trafficking in our commercial activities, and to ensuring that our supply chains are free from slavery and human trafficking. Organizational Structure and Supply Chains This statement covers the activities of Clarke Metal Services Ltd:

- Clarke Metal Services Ltd operates as a bulk trader of a wide range of both long and flat rolled steel products and combines this service with a huge offering of dockside stock for delivery in 48 hours from order.

- Europe and Turkey are the organization's two key global regions where we engage in both the buying and selling of long and flat rolled steel products. Clarke Metal Services Ltd works with a range of steel suppliers including: • European & Turkish steel manufacturers, steel stockholders & steel consumers. As a bulk international steel trader, we buy long and flat rolled steel products in significant quantities directly from quality assured steel manufacturers and subsequently sell such products in significantly smaller batches to reputable steel stockholders and steel consumers. The following is the process by which we assess whether activities or countries are high risk in relation to slavery or human trafficking: 2021/2022

- The organization has undertaken an exercise to identify where we feel modern slavery and human trafficking could most likely occur in our business. We have identified our key risk to be the following: The purchase of long and flat rolled steel products from steel manufacturers operating in countries where protection against breaches of human rights is generally considered to be relatively limited.

We have sought to eradicate any such risk using pragmatic and reasonable solutions. However, we understand that preventing modern slavery and human trafficking will be an ongoing process and our organization will endeavor to reduce the risk of this being present in our supply chain year on year.

Responsibility for the business's anti-slavery initiatives is as follows:



- **Policies:** The Managing Director of Clarke Metal Services Ltd assumes responsibility for putting in place and reviewing policies and the process by which they are developed.
- **Risk Assessments:** To minimize the risk presented by the purchase of long and flat rolled steel products we have taken steps to investigate all suppliers, as described below. We are also reviewing their procurement process to include a request for suppliers to provide their policies on modern slavery and human trafficking before they are placed on our organization's approved supplier list.
- **Investigations/Due Diligence:** The Managing Director of Clarke Metal Services Ltd assumes responsibility for carrying out supplier checks/investigations and due diligence in relation to checking for/suspected instances of slavery and human trafficking.
- **Training:** To ensure a high level of understanding the organization's Directors have collaborated with external legal advisors who provided the organization with an overview of the Modern Slavery Act and advice on the next steps. Other colleagues have also received associated training via appropriate in-house collaboration/tutorials. Relevant Policies Clarke Metal Services Ltd operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:
 - **Whistleblowing Policy** Clarke Metal Services Ltd encourages all its employees, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the organization. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
Clarke Metal Services Ltd.'s whistleblowing procedure is designed to make it easy for employees, customers, or others to make disclosures, without fear of retaliation. The policy can also be made readily available to any customers or others by virtue of a simple oral request made to the organization's 'Designated Whistleblowing Officer' - the Office Co-Ordinator, Deborah Morse
 - **Employee Code of Conduct** Clarke Metal Services Ltd.'s code makes clear to employees the actions and behavior expected of them when representing the organization. Clarke Metal Services Ltd strives to maintain the highest standards of employee conduct and ethical behavior when operating abroad and managing its supply chain.



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Clarke Metal Services Ltd is committed to providing a safe, healthy workplace which protects and respects the human rights of its own employees. To assist with our compliance, we maintain and develop a comprehensive Staff Handbook a copy of which is routinely issued to all employees. This document clearly sets out our company's policies, including, amongst others, Equal Opportunities, Discipline and Grievance, Whistleblowing and Recruitment policies.

- **Supplier Code of Conduct** Clarke Metal Services Ltd is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labor.

Clarke Metal Services Ltd works with suppliers to ensure that they meet the standards of the code and improve their employees' working conditions. However, serious violations Clarke Metal Services Ltd.'s supplier code of conduct will lead to the termination of the business relationship.

We have considered all responses upon receipt and so far none of the responses have raised any cause for concern. On a continuing basis we will raise enquiries with all new suppliers to satisfy ourselves that they have adequate provisions in place to prevent modern slavery and human trafficking.

Performance Indicators Clarke Metal Services Ltd has reviewed its key performance indicators in light of the introduction of the Modern Slavery Act 2015. As a result, the organization has:

- developed a system for supply chain verification whereby Clarke Metal Services Ltd evaluates potential suppliers before they enter the supply chain; and

- reviewed existing supply chains whereby Clarke Metal Services Ltd evaluated all existing suppliers.

Training Clarke Metal Services Ltd.'s modern slavery training for all colleagues covers the following elements:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labor engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organization;



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- what external help is available, for example through the Modern Slavery Helpline, Gang masters and Labour Abuse Authority and "Stronger together"
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps Clarke Metal Services Ltd should take if suppliers do not implement anti-slavery policies in high-risk scenarios, including their removal from our organization's supply chains.

Awareness-raising Program - As well as providing tutorial based training for all colleagues, Clarke Metal Services Ltd has raised awareness of modern slavery issues by circulating an email to all members of the organization. This email with its associated attached documents explained:

- the basic principles of the Modern Slavery Act 2015.
- how employers can identify and prevent slavery and human trafficking.
- what employees can/should do to flag up potential slavery or human trafficking issues to the relevant parties within the organization; and
- what external help is available, for example through the Modern Slavery Helpline.

Approval This statement has been approved by Clarke Metal Services Managing Director, who will review and update it annually.

Shaun Clarke
Managing Director

Clarke Metal Services Ltd.

Date1/7/22.....