

# Modern Slavery Policy

## Background

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:

- Human trafficking
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Forced marriage
- Child labour

## Policy

Steel & Tube respects human rights and is committed to limiting the risk of modern slavery within our supply chains and operations. We do not condone modern slavery in any of our operations or premises and will work to ensure these practices are not present in our operations. We expect that all third parties we engage with will do the same.

If made aware of modern slavery practices within its supply chain, Steel & Tube will resolve the issue in line with the values expressed in this policy. It is expected that suppliers have similar values to us concerning modern slavery.

## Risk Assessment

We commit to undertaking a risk assessment to identify which parts of our operations and supply chains are most at risk from modern slavery.

The focus will be placed on monitoring high-risk suppliers and mitigating associated risks and ensuring that all high-risk suppliers verify that there is no modern slavery within their supply chain.

Responsibility for assessing and addressing modern slavery risks is assigned to the procurement function, overseen by the relevant General Managers.

## Reporting Responsibilities

Employees are encouraged to raise any concerns regarding instances of possible modern slavery. If suspected or believed that a breach of this policy has occurred, contact the Group Sustainability Manager as soon as possible.

If unsure about whether a particular act or conditions represents any of the identified forms of modern slavery, raise concerns with your manager in the first instance or the Group Sustainability Manager.

### **Supply Chain – Supplier conduct**

We will undertake due diligence on all new suppliers who are deemed to be at risk of having some form of modern slavery within their operations, including:

- Assessing the risk profile of countries based on the Global Slavery Index
- Assessing risks in the provision of supplier services

Steel & Tube expects all new and existing Suppliers to comply with the principles set out in this policy. Suppliers must ensure that there are no modern slavery practices in their supply chains and operations.

As a condition of engaging with Steel & Tube, we require at-risk suppliers to confirm:

- Their workforce does not contain forced or compulsory labour practices
- Their workforce is voluntarily and is entitled to leave the work whenever they desire
- Provision of an employment contract that contains reasonable conditions and notice periods
- Employees are not required to post a deposit/bond, and salaries are not withheld for any reasons
- Employees are NOT required to surrender their passports or work permits as a condition of employment
- Underage children are not used in undertaking work

### **Non-compliance with this Policy**

We strive to maintain the highest standards of conduct and ethical behaviour when operating abroad and managing our supply chain. All breaches of this modern slavery policy will be taken seriously and dealt with on a case-by-case basis. Where breaches are identified and the Supplier cannot remain compliant with this policy, Steel & Tube may terminate the contractual arrangements in place as soon as practicable, at no cost to Steel & Tube.

Mark Malpass  
**Chief Executive Officer**

Date: June 2023