

Salzgitter Mannesmann UK Limited are a UK based steel stockholder carrying a range of circular, rectangular and square hollow sections, universal beams, universal columns and parallel flange channels. Salzgitter Mannesmann acknowledges its responsibilities in relation to tackling modern slavery and human trafficking and understands that this requires an ongoing review of internal practices in relation to both its workforce and supply chains.

**Structure & Supply Chain:**

Salzgitter Mannesmann UK Limited currently operates in Europe and Turkey, where both buying & selling activities are carried out. The Company is committed to working with both its supply chain and customer base to ensure they are aware of our joint responsibilities under the Modern Slavery Act 2015.

**Policies on modern slavery:**

The Company does not knowingly trade with any businesses involved in slavery or human trafficking but does note that this type of activity can be hidden. Regular direct communication highlights to suppliers and customers situated in these key risk regions to ensure they are aware of their obligations and are taking positive action against slavery and human trafficking. Salzgitter Mannesmann commit to remind and reinforce these policies on a regular basis.

**Due Diligence Process:**

All Salzgitter Mannesmann staff can refer to Company Policies to recognise the signs of victims of slavery and human trafficking and will be encouraged to use the Company whistleblowing policy to report any concerns related to the activities of suppliers and customers where breaches may occur. Regular reminder education will serve to raise employee awareness.

All new suppliers will be circularised with Salzgitter Mannesmann UK Limited's modern slavery and human trafficking policy.

**Risk Assessment**

Whilst subject to ongoing review and assessment, currently our key risk has been identified to be in areas where protection against breaches of human rights are generally considered to be relatively limited and can occur in low income jurisdictions. Ongoing risk assessments are conducted on new suppliers and / or customers and on all trading areas to monitor risk areas and to ensure our policies meet the standards required.

**Measuring effectiveness**

To measure effectiveness of our Anti-slavery and human trafficking policy we review our procedures in line with current legislation and assess our suppliers on an annual basis. All new suppliers are reviewed in line with this policy. The Company intends to remain vigilant and explore other measures to ensure ongoing effectiveness, setting clear targets to ensure this is achieved.

**Staff training**

Staff training is vital to ensure awareness of modern slavery and human trafficking both within our organisation and within other organisations our business comes into contact with. To that end, Salzgitter Mannesmann UK Limited provides induction and reminder training to all staff, not just those who are involved in supply chain activities. The Company provides a culture of support where staff can bring any concerns to management.

**Approval**

This statement has been approved by Salzgitter Mannesmann UK Limited's Managing Director who will review and update it at regular intervals.



Julian Thompson  
Managing Director  
Salzgitter Mannesmann UK Limited  
31 December 2023