

Anti-Slavery and Human Trafficking Statement

Introduction

voestalpine High Performance Metals UK Limited is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

This statement is made pursuant to section 54(1) of the Modern Slavery Act (MAS) 2015 and sets out the steps we have taken to ensure that our Business as well as our supply chains is free from slavery and human trafficking during the financial year ending 31st March 2021.

Our organisation structure and operations

voestalpine High Performance Metals UK Limited is a steel supplier working in many industries, the principles ones being Oil and Gas, Aerospace, Power Generation, Automotive, Food, Packaging and Recycling

We are part of the voestalpine Group, one of world's leading steel manufacturers which has production facilities all around the globe. voestalpine AG, our parent company, has its head office in Linz, Austria. The Group has around 49,000 employees operating in more than 50 countries with an annual turnover of over 12.7 Billion Euros. voestalpine High Performance Metals UK Limited currently employees 111 people operating in the UK, turnover for 2019/20 was just over £59M.

Nature of our supply chains

Our key supply chains involve the supply of steel from Steel Mills in Austria, Sweden, Germany and Brazil.

Policies relating to slavery and human trafficking

Our Anti-Slavery and Human Trafficking policy reflects our commitment to acting ethically and with integrity in all our business activities and relationships and implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains.

We are also in the process of ensuring that our suppliers are aware of our policies.

This policy has been developed as a result of the introduction of the Modern Slavery Act 2015 and in particular section 54, in conjunction with other Group companies and our Employee Advisor (Make UK) and in consultation with the Works Council.

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Risk Assessment

We have used the following process to assess which of our own activities and supply chains represent the highest risks in respect of slavery or human trafficking.

We have interrogated websites, including voestalpine AG, the International Labour Organisation and The Walk Free Foundation to ascertain where, which industries and products and the commercial transactions that could be affected by slavery and human trafficking.

On the basis of this process we do not consider that we operate in high risk sectors or locations as all our steel is supplied from reputable Steel Mills, most of which are owned by voestalpine AG.

We will however look to continually review the operations of existing suppliers to ensure that they adhere to our Anti-Slavery and Human Trafficking Policy and will not tolerate slavery or human trafficking within our supply chains.

Due diligence processes in relation to slavery and human trafficking

In order to monitor and mitigate the risks of slavery and human trafficking occurring within our supply chains we will aim to undertake the following due diligence processes in relation to all suppliers identified as being high risk according to the risk assessment procedures

We will look to implement a Supply Chain Compliance programme which will consist of suppliers, upon request, completing an Approved Supplier Questionnaire which will confirm their adherence to our Anti-Slavery and Human Trafficking policy. We will also aim to periodically audit suppliers for any Modern Slavery risk.

Our procedures will aim to:-

- establish and assess areas of potential risk in our business and supply chains;
- monitor potential risk areas in our business and supply chains;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains;
- provide adequate protection for whistle blowers

Staff training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, the Company will provide all employees and businesses with access to our Anti-Slavery and Human Trafficking Policy and Statement which will be located on the Company's website. In addition our Anti-Slavery and Human Trafficking Policy will form part of the Induction Programme for new employees.

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We will make specific provision in our Whistleblowing Policy for the protection of those who whistle-blow in relation to an issue of modern slavery.

Monitoring of our Anti-Slavery and Human Trafficking Policy

We will aim to use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:-

- number of Anti-Slavery and Human Trafficking Policy documents issued to employees
- number of completed and signed Approved Supplier Questionnaires
- number of completed Internal and Supplier Audits

Future action

During the financial year 2021/22 we will ensure that all voestalpine High Performance Metals UK Limited employees are aware of and understand our Anti-Slavery and Human Trafficking Policy. We will revisit our Supply Chain Compliance programme and amend our Approved Supplier Questionnaire accordingly.

Signature:



Mark Williams
Managing Director

Date: 01.04.2021
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