



# Modern Slavery Statement

## Organisation

This statement applies to Barrett Steel Limited (referred to in this statement as 'the Organisation').

The information included in the statement refers to the financial year ending 30<sup>th</sup> September 2018.

## Organisation Structure

The Organisation is an independent steel stockholder and processor with trading operations in the United Kingdom and USA, controlled by a Group Board of Directors.

The Organisation's Group Head Office is centralised in Bradford, United Kingdom. There are 43 businesses across 26 locations within the Group, organised across General Steels, Tubes, Engineering Steels, and International Divisions. The Group businesses operate across all regions within the UK and Northern Ireland, and has a further business which operates in Houston, USA.

The Organisation employs over 1,000 people throughout its international operations as permanent, temporary or agency staff.

## Definitions

The Organisation considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

## Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking.

## Supply Chains

The Organisation is committed to working with its supply chain to ensure that they are aware of their responsibilities under the Modern Slavery Act 2015 and remain committed to tackling the problem through their own actions.

In order to fulfil its activities, the main supply chains of the Organisation include those related to the supply of steel. We understand that the Organisation's first tier suppliers are intermediary traders and therefore have further contractual relationships with lower- tier suppliers.

The products, machinery and consumables sold or utilised by the Organisation are primarily sourced from within the UK and mainland Europe, across a supply chain consisting of more than 5,000 active suppliers.

The Organisation does not knowingly deal with any businesses involved in slavery or human trafficking, but it does understand that this is a hidden problem that must be tackled in conjunction with recruitment personnel/agencies, suppliers and contractors.

## Potential Exposure

In general, the Organisation considers its exposure to slavery and human trafficking to be relatively limited. It has taken steps to ensure that such practices do not take place in its businesses nor the business of any organisation that supplies goods and/ or services to it.

## Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/ or human trafficking does not take place in its organisation or supply chains as part of our BES 6001 Responsible Sourcing compliance standard. The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.
- Risk assessment review of the steel supplier base to identify the potential risks in our supply chains.
- Recruitment guidelines are in place to ensure entitlement to work and to prevent forced or bonded labour.
- The Organisation is committed to paying the appropriate national minimum wage or national living wage to employees within the guidelines issued by HMRC.
- Direct communication ensures that higher risk suppliers are aware of their obligations and are taking positive action against slavery and human trafficking associations within their organisation.

## Key Performance Indicators

Proportionate to the identified modern slavery risk, the Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains:

- The Organisation has considered whether existing KPI's make our operations and supply chain vulnerable to modern slavery, and understands there to be minimal exposure.
- Training is planned for Leaders and staff about grievance procedures, and implementation of whistle blowing procedures for workers and employees if cases are suspected or found.
- To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business our Modern Slavery Policy Statement is included in our Employee Handbook.

## Modern Slavery Policy Compliance Group

The Organisation has a Modern Slavery Policy Compliance Group, to whom all concerns regarding modern slavery should be addressed and who will then undertake relevant action with regard to the Organisation's obligations.

Individuals with evidence of non- compliance with the Modern Slavery Act in connection with Barrett Steel supply chains or businesses we engage with are encouraged to report their concerns to the Slavery Compliance Group using the following email address [msp@barrettsteel.com](mailto:msp@barrettsteel.com).

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 31 March 2019

Print name: Andy Warcup

Job Title: Chief Operating Officer

Signed:

