

MODERN SLAVERY POLICY

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

ASM Metal Recycling recognises that it has a responsibility to take a robust approach to slavery and human trafficking. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Through findings from our risk assessments, ASM's existing commercial due diligence practices are sufficient to ensure continual compliance to the requirements of the Act.

- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour;
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each supplier to at least adopt 'one-up' due diligence on the next link in the chain.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors, to comply with our values.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

The company has a number of relevant policies that will support its efforts to ensure compliance.



- Modern Slavery Policy
- Whistleblowing Policy
- Employee Handbook

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We 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:

- Completion of audits by Directors.
- Use of labour monitoring and payroll systems.
- Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the current financial year.

Paul McDonald
Managing Director
December 2018

