

Modern Slavery & Human Trafficking Statement

Introduction

This statement has been prepared in accordance with the Modern Slavery Act 2015 and has been made in respect of All Metal Services Limited (AMS).

AMS is committed to ensuring that our staff are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and/or similar human rights abuses. We are also committed to ensuring our approach to tackling modern slavery within our own business and throughout our supply chains is consistent with the Modern Slavery Act 2015.

This Statement sets out our commitment to prevent slavery and human trafficking within our business and outlines the steps we have put in place to ensure that there is no slavery or human trafficking within our business and our supply chains. We all have a duty and responsibility to be alert to risks, however small. Staff are aware of how to raise concerns and are encouraged to report any concerns to management.

Our Business & Supply Chain

Our primary business activity is that of the stockholding and supply of metals into the Aerospace, Defence and Space Industries. We supply and offer cutting, machining, and shearing of raw material directly to major manufacturers and their supply chains locally, nationally and internationally.

Each of our facilities are responsible for the sourcing and supply of goods and services to their supply chain. We maintain a number of Group-wide deals with national and international suppliers whose products or services are required to be manufactured across our facilities.

AMS complies with all relevant employment laws and require our sub-contractors, suppliers and wider supply chain to also confirm compliance.

Policy

Our policy applies to all staff and is incorporated into our agreements with both sub-contractors and suppliers and outlines our zero-tolerance approach to slavery and human trafficking. We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains.

This 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 within our supply chains.

The policy also sets out what action's individuals should take if they are concerned that slavery or human trafficking is taking place in our business or supply chain.

To ensure that the risk of slavery or trafficking is prevented, we will engage with sub-contractors and suppliers to require that they improve their practices where concerns are identified.

The Policy is complimented by our:

- Whistleblowing Policy - we actively encourage our workers, customers, and other business partners to report any concerns related to it's direct activities or its supply chains
- Business Risk - we assess all risks to the business, in accordance with our internal procedures and policies

- Corporate Social Responsibility (CSR) Policy – This policy is currently under review. Our CSR policy will summarise how we manage our environmental impacts and how we work responsibly with all of our suppliers and local communities

Our policies are reviewed on an annual basis by our Human Resources team and copies of our policies are available on request.

Our Whistleblowing hotline is independently operated by EthicsPoint and can be used to report any concerns of modern slavery. A confidential and anonymous report may be filled via the website, www.reliance.ethicspoint.com, or by the free number which is 0800 032 8483.

At current we have not identified any significant risks of modern slavery, forced labour, or human trafficking within our business, our sub-contractors or suppliers. We are committed to continuing we are alert to the potential risks.

Due Diligence

All of our contractors are subject to due diligence via our onboarding process which ensures that our suppliers and sub-contractors have an awareness of our modern slavery commitments, along with our expectations.

The onboarding process involves a meeting between our Purchasing or Commercial teams and the relevant contractor to discuss contract orders and AMS policies, and how they are best implemented. If any concerns are raised, then further clarification may be sought.

We require our suppliers to confirm their understanding of our Modern Slavery and Human Trafficking policy and provide copies of their own modern slavery policies.

We meet regularly with our suppliers to review their performance and, if necessary, raise matters of concern. Where required sanctions will be invoked against our suppliers who fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Responsibility for the Company's anti-slavery initiatives is as follows:

- Policies
 - Our Human Resources department and our parent company, Reliance Steel & Aluminum Co, are responsible for creating and regularly reviewing our policies and procedures. Regular policy reviews take place to ensure that our policies are compliant with legislation and continue to meet the needs of the business. Policies are further reviewed and approved by our Managing Director before issue.
- Risk assessments
 - Our Human Resources department is responsible for undertaking risk assessments in respect of human rights and modern slavery by a process of reviewing our recruitment processes and salaries annually.
- Due diligence
 - Our Managing Director is responsible for ensuring that we carry out due diligence in relation to known or suspected instances of modern slavery and human trafficking within our business or supply chain.

High Risk Areas

The manufacturing industry generally can include areas of high risk, with a number of job roles which have a low skill requirement and provide potential opportunities for the exploitation of individuals.

The raw materials that we use may be from suppliers from overseas countries that are at high risk of slavery and/or human trafficking.

All raw material sourced by AMS is done through our central purchasing team based at our Birmingham facility. This often means working with local, national and international businesses which may not be aware of the potential for slavery and human trafficking.

Our Process for Managing Risk

AMS is committed to ensuring that we mitigate the risk of slavery or trafficking within our business and our sub-contractors and suppliers, we do this by ensuring we:

- identify and assess potential risk areas during the new supplier process
- regularly review our existing supply chains policies and procedures to ensure they are compliant
- engage with sub-contractors and suppliers to require that they improve their practices where concerns are identified
- ensure we source material from customer qualified suppliers, approved lists and AS9120/AS9100 accredited companies
- ensure our Whistleblowing hotline is accessible by all employees and our supply chain. This also includes ensuring employees and our supply chain have access to our Whistleblowing contact information and ensuring any individuals who raise concerns are protected in line with our Whistleblowing Policy.

Training

We provide appropriate training to ensure that relevant employees understand the risks of modern slavery and human trafficking within our business and supply chains.

Review of this Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Slavery and Human Trafficking Statement.



Mike Cooney, Managing Director
For and on behalf of All Metal Services Ltd.
January 2023