

AARTEE slavery and human trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 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 December 2018

Introduction

AARTEE 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.

Our organisational structure and operations

The AARTEE Bright Bar Limited is structured into four principal divisions which are Hot Rolled, Bright Bar, Distribution and Steel Services. The two former divisions are processors of engineering steel bars which inter trade with each other and ultimately integrate with Distribution. The latter division then offers the sales channels to the end customer via its stockholding depots. In addition the Steel Services division buys and sells engineering steels via its import supply chain and into the domestic market. The vertical integration structure of the Group provides significant value and flexibility to the business model. In addition to inter trading, circa 40% of turnover is exported to international markets worldwide.

Nature of our supply chains

Our key supply chains involve the sourcing of engineering grade steel in billet, bar and coil form from a range of world class steel making sources mainly in Europe. AARTEE monitors suppliers based on its assessment of the risk presented

Policies relating to slavery and human trafficking

Our Anti-slavery policy reflects our commitment 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, and to acting ethically and with integrity in all our business activities and relationships.

We ensure that our suppliers are aware of our policies and take appropriate measures to ensure that our suppliers adhere to the same high standards.

AARTEE suppliers and subcontractors are required to review this Statement and comply with it and with the **AARTEE Supplier Code of Conduct**. Such suppliers will periodically be required to certify that they have (a) read and understand this Statement and Code of Conduct and

(b) comply with the laws regarding human trafficking, slavery and labour standards of the country or countries in which they are doing business.

Risk assessment

AARTEE monitors our own activities and supply chains which represent the highest risks in respect of slavery or human trafficking. Assessment of the risk presented by the supplier, takes into consideration the country in which it operates and the particular product or service the supplier or sub contractor provides.

Staff training

We facilitate training to key and appropriate staff to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively operate our policies and procedures aimed at mitigating this risk.

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

Reporting

AARTEE provides retaliation-free means of reporting suspected trafficking activity set forth in this statement. Such reporting is a critical tool to assist AARTEE in monitoring and detecting any trafficking violations. As required by applicable regulation, AARTEE will immediately notify appropriate government officials of any credible information regarding suspected trafficking activity.

Any AARTEE employee that is informed of or witnesses a violation of the Modern Slavery Act, or is uncertain about the proper course of action relating to the matters addressed therein, is encouraged to immediately contact his or her supervisor. If the issue is not resolved or the employee is not comfortable raising the issue with his or her supervisor, employees are instructed to use the other reporting channels made available to them by AARTEE

Likewise, if a AARTEE supplier is made aware of any credible information from any source pertaining to a suspected trafficking violation, that supplier is expected to investigate the allegations, take appropriate remedial measures, and notify AARTEE of that information as well as what action it has taken with respect to the allegation.

AARTEE is committed to providing a safe and easy means of reporting suspected trafficking activity and is committed to prevent any form of slavery or human trafficking in its supply chain.

Gianpiero Repole

Chief Executive Officer