

MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDING December 31, 2019

1. About us

Kloeckner Metals UK is one of the largest mill independent multi metal stockholder/distributors in the UK. We offer a diverse range of ferrous and non-ferrous products sourced from reputable and accredited mill sources. We operate in all major market sectors across the UK. Kloeckner Metals UK is part of Klöckner & Co, one of the largest producer independent distributors of steel and metal products and one of the leading steel service centre companies worldwide. Through its distribution and service network of around 160 locations in 13 countries, the Group supplies around 100,000 customers.

2. Our principles and sourcing policies

Kloeckner Metals UK purchases goods and services from a wide range of suppliers and across a number of categories and is committed to acquiring these in a responsible manner. Kloeckner Metals UK is not aware of any modern slavery activities within its operations or supply chain but if any were discovered then it would act immediately to ensure compliance with legislation and its own policies to prevent further abuse. Before becoming a registered supplier to Kloeckner Metals UK, all suppliers are expected to agree to comply with our Code of Conduct.

3. Our Code of Conduct

We aim to ensure that everyone who works for us and with us, is aware of the importance of and the promotion of fair and safe working conditions. We insist that everyone complies with the relevant elements of our code of conduct. Whilst our employees and partners must ensure that they meet our code of conduct requirements, we aim to promote high ethical standards without imposing unachievable conditions.

4. Auditing and monitoring

Our procurement team assess suppliers on a range of ethical, labour, safety, human rights and environmental standards during the supplier selection process and as part of our ongoing assurance activities.



5. Non-compliance

Compliance with our Code of Conduct is a mandatory element of our employees' contract of employment. Breaches of the Code will result in action being taken in accordance with our disciplinary policy. If we become aware of any breaches of the Code by our business partners we will take immediate action taking account of those whose interests have been violated.

6. Training

Kloeckner Metals UK employees undergo a programme of training to raise awareness of a variety of compliance issues including slavery, human trafficking and human rights. The aim of the training is to promote compliance and equal rights within the workplace and across the wider community including our business partners.

7. Reporting

Systems are in place to encourage the reporting of concerns. Employees and our Business partners can do this by informing our UK National Compliance Team in a confidential manner if so required.

8. Scope

This statement applies to Kloeckner Metals UK Holdings Limited, and its subsidiaries, ASD Limited, t/a Kloeckner Metals UK Limited and ASD Westok Limited.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Slavery and Human Trafficking Statement for the financial year ending 2019. This Statement will be reviewed and updated on an annual basis.

Approved by the Board of Directors on April 17, 2019

Signed:



Peter Whiting
Chairman of the Board and CEO
ASD Holding

