



ELG Haniel Metals Ltd, UK – Modern Slavery Statement

Introduction from Mark Vaughan, CEO - ELG Haniel Metals Ltd, UK

We are committed to improving our practices to combat slavery and human trafficking. We have implemented a Modern Slavery Policy throughout the organisation. This is in-line with the core values contained in our '6 Principles of ELG', prominently displayed throughout our organisation, contained within our Employee Handbook and available for download on our website.

All potential breaches are investigated. We have an external Compliance Helpline available by telephone or email which is available anytime where compliance related issues cannot be otherwise resolved.

Company Structure

ELG Haniel Metals Ltd is one of the leading companies in the United Kingdom for the recycling of Stainless Steel and Alloy materials. Established in 1981, our UK Head Office is located in Sheffield. We have a network of 5 strategically located operations throughout the country focusing on supplier and customer centricity.

ELG Haniel Metals Ltd is a wholly owned subsidiary of ELG Haniel GmbH, headquartered in Duisburg, Germany. Dating back to 1962, the Group currently has over 50 operational locations worldwide, employing in excess of 1,200 personnel.

ELG Haniel GmbH is part of the Franz Haniel & Cie GmbH portfolio, a German family equity company since 1756. Haniel Group operates across 5 continents and employs over 18,000 personnel worldwide.

ELG Haniel Metals Ltd is an active member of the BIR - Bureau of International Recycling and BMRA - British Metals Recycling Association, working to improve and represent our industry. Additionally, we have a close working relationship with EuRIC - European Recycling Industries' Confederation AISBL.

Our Business

In the UK, our business has operational locations in Sheffield (UK Head Office), Irvine, Hyde, Darlaston and Barking.

Our Supply Chains

Our supply chains include materials sourced from metal traders, manufacturers and demolition projects. Recycled metals are predominantly sourced from within the UK in addition to countries throughout Europe, Africa, Asia, Australasia and South America.

Our Policies on 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 Modern 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

As part of our objective to identify and mitigate risk, we have established that metal recycling is not included in the at risk product list detailed in the Global Slavery Index 2018. Our Company does not source material in any of the top 10 countries with a vulnerability to modern slavery.

We have extended our 'Know Your Supplier' check to include modern slavery. This is used as a basis for our due diligence for new suppliers and customers. This was extended to existing suppliers and sent to all domestic and overseas accounts in 2019.

We have systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier Adherence to Our Values and Ethics

We are committed to acting ethically in respect of slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have a supply chain compliance programme in place. This consists of the 'Know Your Supplier' audit of both suppliers and customers. Where regular business is conducted, face-to-face visits are undertaken to gain a better understanding of the contracted partner.

A Dedicated Compliance Team

This consists in involvement from the following departments:

- CEO Office
 - Compliance
 - Human Resources
 - Internal Audit
- Finance
 - Legal
- Commercial
 - Suppliers
 - Customers

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 our staff. We also expect our business partners to provide training to their staff, suppliers and providers.

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:

- 'Know Your Supplier' and Customer checks
- Supplier/Customer visits
- Employee Trainings
- Issue and acceptance of our Modern Slavery Policy

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 31 December 2019.

Mark A Vaughan
Chief Executive Officer
ELG Haniel Metals Ltd, UK