

HALL & PICKLES 1812 LIMITED

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

This is our Slavery and Human Trafficking Statement pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") for the financial year to 31 May 2024. This statement has been approved by the Board of Directors of Hall & Pickles 1812 Ltd and will be reviewed annually. The signed copy is held at the Company's registered office.

HALL & PICKLES 1812 Ltd is one of the largest independent steel stockholders in the United Kingdom with an annual turnover of over £150 million. We are committed to complying with our ethical and legal obligations to ensure that slavery and human trafficking do not take place within our business, or any part of our supply chain.

We have put in place an Anti-Slavery and Human Trafficking Policy of which all staff have been made aware. In particular, any member of staff with responsibility for sourcing products or services from third parties will be instructed on the Policy and its application to our business.

Our policy can be found on our Website and on the Intranet.

Our Business

HALL & PICKLES 1812 Ltd operates at sites across the UK. All our employees are based in the UK.

Our business comprises two trading divisions: Hall & Pickles and John Tainton. The two divisions stock different steel products and therefore their supply chains are distinct. Hall & Pickles stock beams, joists, a full range of plate and flat products, merchant bar, hollow section; precision welded steel tubes and flooring products alongside a comprehensive bespoke range of services such as general and laser cutting, shot blasting and painting. By contrast, John Tainton stock strip mill, plate and coil products.

Overview of Our Supply Chain

We operate an Assured Supplier list across our business. The majority of products we sell are supplied by well-established UK or Western European suppliers in the steel industry, including Tata, and British Steel. These suppliers are subject to the requirements of the Modern Slavery Act 2015 in the UK and are committed to their legal obligations to ensure their respective supply chains are free of slavery and human trafficking. They have in place robust Modern Slavery policies and procedures and are also committed to eradicating 'conflict minerals' (which originate in conditions of armed conflict and human rights abuses) from their supply chains. A small proportion of the products we sell are sourced via other routes, including through steel traders based outside the UK who in turn source steel from third party steel mills located in various locations globally.

Safeguards in Our Supply Chain

We have introduced a process under which we require our Assured Suppliers, including any traders with whom we deal, to provide us with details of the steps they have taken to ensure that slavery and human trafficking are not taking place in their business or their respective supply chains. We

will require that compliance with our policy is a condition of becoming and remaining one of our Assured Suppliers.

It is our policy only to trade with organisations actively taking steps to eliminate and monitor slavery and human trafficking. Our policy on Slavery and Human Trafficking has been shared with existing suppliers, and compliance with our policy forms part of the terms and conditions of purchase under which we buy steel, steel products and services. We will assess any instances of non-compliance on a case-by-case basis, and take appropriate action where it is found, including the potential termination of contracts.

Our Recruitment

Our own recruitment processes are transparent and we communicate directly with candidates to confirm any job arrangements. New employees are vetted; we ensure that identities are confirmed, and payments are made directly into an appropriate personal UK bank account. We also have a policy in place to protect public-interest whistle blowing by our staff.

1st June 2023 to 31st May 2024