

CELSA IS ALREADY LOW CARBON

The background of the slide is a photograph of several wind turbines silhouetted against a sunset sky. The sky transitions from a deep orange at the horizon to a lighter, pale yellow at the top. The turbines are arranged in a line across the landscape, with the largest one in the foreground on the left and smaller ones receding into the distance. The overall mood is serene and clean, representing renewable energy.

Slavery and Human Trafficking Statement
Financial Year 2023
CELSA (UK) HOLDINGS LTD

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Slavery and Human Trafficking Statement for the Financial Year 2023



The UK Modern Slavery Act 2015 requires certain businesses to publish a statement setting out the steps taken in the previous financial year to ensure that slavery and human trafficking is not taking place in their supply chains or own business. CELSA (UK) Holdings Ltd is obliged to publish such a statement.

ORGANISATION STRUCTURE AND SUPPLY CHAINS

This statement is made by the Company on behalf of itself and on behalf of its subsidiaries (together referred to as the “CELSA (UK) Holdings Ltd (CELSA)”) that are required to make a statement pursuant to the United Kingdom Modern Slavery Act, 2015.”

These subsidiaries are – BRC Ltd, ROM Group Ltd, Express Reinforcements Ltd, CELSA Manufacturing UK, CELSA Recycling UK.

CELSA (UK) Holdings Ltd (CELSA) is a major supplier of reinforcement and structural steel to the construction industry. CELSA collects scrap metals at its recycling hubs and recycles steel scrap by use of an Electric Arc Furnace (EAF), continuous casting of billets and hot rolling to produce reinforcing bar and steel sections. Additional recycling is achieved through mineral extraction/reuse of the furnace slag, and the supply of fabricated reinforcement. CELSA recognises its business’ impact and the part it has to play in maintaining high standards of business ethics.



POLICY

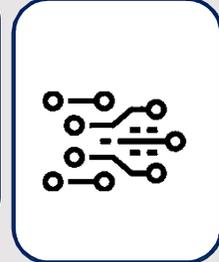
We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. CELSA’s Mission, Vision, Values and Attitudes reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and control including ensuring slavery and human trafficking is not taking place anywhere in our supply chains.



DUE DILIGENCE PROCESS

Our supply chains principally include the sourcing of raw material scrap ferrous metal. Respecting human rights and environmental issues in the supply chain is ultimately our suppliers’ responsibility. However, we understand that we play an active role in supplier development and clearly communicate

our expectations to our suppliers. We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.



RISK ASSESSMENT AND MANAGEMENT

As part of our initiative to identify and mitigate risk:

- We build long standing relationships with our ‘Top 100’ suppliers and customers and clearly communicate our expected ethical conduct.
- With regards to our supply chains, we expect these entities to have suitable anti-slavery and human trafficking policies and processes;
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers including the identification of any ILO indicators for forced labour.
- Our supply chain agrees to operate under our terms and conditions which includes clauses on modern slavery and comply with our audits.

Slavery and Human Trafficking Statement for the Financial Year 2023

KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN

Increase number of Modern Slavery Risk Assessments carried out on suppliers year on year.
Increase working with only suppliers who have compliant policies and processes.

RESPONSIBLE SOURCING

Our standard terms require our suppliers to warrant that they adopt good ethical behaviour as well as apply with all applicable laws. CELSA's Responsible Sourcing Policy sets out the following principles which apply to the Slavery and Human Trafficking Statement:

Ethics: Adopt and apply standards of ethical behaviour appropriate to our activities.

Supply chain management: Engage with suppliers of our constituent materials to ensure, where practicable, they maintain management systems appropriate to the needs of our activities, including adherence to this policy.

Fundamental rights at work: Operate within international norms concerning human rights and labour practices.

Employment and skills: Implement fair operating practices with regards to employment and economic activities, including development of a skilled and competent workforce.

Contribution to the built environment: Aim to develop innovative & effective products that improve the quality and sustainability of the built environment.

Sustainability and Responsible Sourcing Policy: Our policy can be found in full at: <http://www.celsauk.com/Downloads.mvc/Policies>

TRAINING ON MODERN SLAVERY AND TRAFFICKING

This policy shall be communicated to all persons working for or on behalf of CELSA (including contractors) as part of the company wide training programme and made available to the public via the company website.

CELSA's modern slavery statement is published within 6 months of the organisation's financial year end. CELSA's financial year end is 31st December. This statement will be published annually on the subsidiary websites.



This statement is approved by:

Carles Rovira
CEO
26/09/2024

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