



SEBDEN HOLDINGS LIMITED

MODERN SLAVERY STATEMENT

This statement applies to the group of companies within Sebden Holdings Limited (referred to in this statement as 'the Group'). The Group comprises of separate trading companies including:

- Sebden Steel Service Centres Limited
- Albion Sections Limited

Any reference to the Group in this statement applies to the activities of these separate trading companies.

The information in this statement refers to the financial year 1st April 2021 to 31st March 2022.

ORGANISATIONAL STRUCTURE

The Group supplies a wide range of customers, spread over many industries, predominantly steel related, throughout the UK & Ireland, from locations across Great Britain & Northern Ireland.

The Group is controlled by a Board of Directors, with its separate companies reporting to the Board through the Directors of those companies. The commercial operations of the Group's companies have limited autonomy allowed by the Board.

The labour supplied to the Company in pursuance of its operation is exclusively within the United Kingdom and Ireland.

DEFINITIONS

The Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Group is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases exceeds those minimums in relation to its employees.

SUPPLY CHAINS

In order to fulfil its activities, the Group's main supply chains include those related to the manufacture and distribution of steel. In some cases, our suppliers are intermediary traders and therefore have further contractual relationships with manufacturers and distributors. The procurement and subsequent distribution of steel within the Group is administered by Sebden Steel Service Centres Limited.

Other suppliers generally provide services rather than materials which are arranged or sourced by the Group's companies from their own approved suppliers.

POTENTIAL EXPOSURE

The Group considers its main exposure to the risk of slavery and human trafficking to exist in its steel supply chains because they may at times involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, the Group considers its exposure to slavery or human trafficking to be relatively low. Nonetheless it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods or services to it.

PREVENTATIVE STEPS

All employees are recruited in accordance with clear procedures, including to 'right to work' checks and ensuring compliance with national minimum wage and living wage requirements.

The Group has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Group has taken the following steps to ensure that modern slavery is not taking place:

- This Modern Slavery Statement is published on the Group's website.
- The Employee Handbook, issued as part of the induction process, advises new employees of the grievance procedure relating to their employment.
- Employees are made aware of the procedure and protection of Whistle-Blowers which may relate to modern slavery as a qualifying disclosure in case of a relevant failure by the Company.
- Sebden Steel Service Centres Limited 'Supplier Approval' criteria will include the following requirements:
 - Direct mill suppliers to provide a Modern Slavery Statement as an obligatory requirement
 - Third party suppliers to provide either a Modern Slavery Statement or a management declaration with regard to responsible procurement.

ASSOCIATED POLICIES

The Group has a Personal Harassment Policy and an Equal Opportunities Policy which relate to its stance on modern slavery.

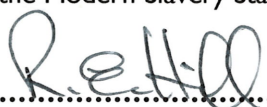
SLAVERY COMPLIANCE OFFICER

The Group's Human Resource Director will act as a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Group's obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Board approval of the Modern Slavery Statement for 2021/22 was given on 19th October 2022.

Signed

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R.E. Hill, Chairman

Date

19th October 2022