

Spartan UK Ltd: Modern slavery and human trafficking statement:-

Spartan UK acknowledges a responsibility under the modern Slavery Act 2015 and is committed to ensure that modern slavery servitude, human trafficking and forced labour is not taking place within our business or supply chain.

Spartan UK has a zero tolerance approach to any form of modern slavery and therefore will not support or deal with any business knowingly involved in slavery or human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Spartan UK is a leading quarto steel plate re-roller, supplying UK and Northern Europe with a wide range of steel plates suitable for application in numerous industrial sectors, such as construction, bridges, wind turbines etc. Spartan UK has a turnover of over £150m and employs 120 people. Based in Gateshead in the North East of England and part of the Metinvest Group, our core material is purchased through our Holding Company based in the Ukraine. All procurement for the Gateshead site is completed by the Purchasing Department at Gateshead.

Diligence

As part of Spartan UK's due diligence process we will endeavour to ensure that regular reviews of our suppliers take place.

Our statement and policies

This Spartan UK Modern Slavery and Human trafficking statement sets out the organisation's stance on modern slavery and gives guidance on what to do in the event that a suspected breach of the Modern Slavery Act 2015 has taken place.

Spartan UK are registered on Home Office Modern Slavery Contact Database (please see following link). www.gov.uk/homeoffice/modern-slavery-database

Alongside this Spartan UK operates the following internal policies to ensure we are conducting business in an ethical and transparent manner as detailed below.

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. Our Whistleblowing hotline is 0800600777 or +380623847232
3. Code of Ethics. Our code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

4. Modern Slavery Statement (this statement).
5. Purchasing and HR staff have completed a formal training course in order to raise awareness around the subject of Modern Slavery.

Our suppliers

Spartan UK operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery, reviewing company performance, HS&E compliance and references from other customers to establish that they are suitable, this may involve on site audits which include a review of working conditions.

In the event we are made aware of any human trafficking / slavery activities within our supply chain, we would act immediately in accordance with our legal and moral obligations.

Our procurement team are diligent when conducting supplier reviews and are aware of potential signs that indicate there may be modern slavery practices taking place. They are aware of what to do should they suspect that there is an issue within our supply chain. This statement is communicated to all levels of the business and is reviewed on a regular basis to ensure its continuing suitability and relevance to the company activities.

It is a requirement of Spartan UK that as part of the supplier visit agenda we request a copy of their Modern Slavery Statement/Policy or that they complete and return Spartan's Modern Slavery questionnaire. Any transgressions identified will be registered on Spartan's Modern Slavery database and addressed appropriately.

Covid 19

During the Covid 19 pandemic Spartan UK has continued to work, abiding by Local and Government guidelines. Purchasing and Finance departments have worked at home for the majority of time using Teams and Zoom to facilitate communication. On occasion and when appropriate purchasing staff have met with suppliers, they have continued to remain vigilant in line with their training. Spartan recognises that our ability to go to potential supplier sites is limited at this time and therefore has addressed this element of our process by limiting the number of new suppliers that are brought on board. This will not change until we are confident we are able to meet our modern slavery obligations through supplier visits.

Additionally, Spartan continues to pay suppliers within terms, implement government and local policies to ensure the safety of our team, has HR on site with an office based open door policy for staff guidance and grievance. Teams working from home are checked in on a regular basis. Alongside this for the safety of our most vulnerable some employees have been furloughed as they have been required to Shield. Spartan have limited recruitment throughout the pandemic.

Human Resources access has remained accessible for all Spartan UK throughout the period of the pandemic.

Guidance

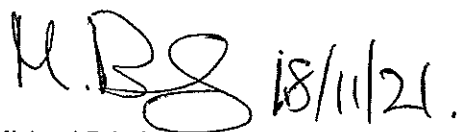
If anyone has any information or knowledge that highlights any practices taking place that violate the Modern Slavery Act 2015 they should contact Spartan HR 0191 4604245

Review

To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our business a full copy of the Modern Slavery Act 2015 will be accessible to all employees on the Company's SharePoint and can be obtained from the HR department upon request.

Spartan UK has a financial year end of 31st December. This Modern Slavery statement is applicable from 1st January 2020.

Signed on behalf of Spartan UK Limited

Handwritten signature of Michael Brierley and the date 18/11/21.

Michael Brierley
Chief Executive Officer