



DYFED STEELS LTD

## **Modern Slavery Act 2015**

### **Modern slavery and human trafficking**

#### **Statement**

This statement is made pursuant to s.54(1) of the Modern Slavery Act 2015 and sets out the steps that Dyfed Steels Ltd and its subsidiaries has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. 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.

#### **Organisational structure**

Dyfed Steels Ltd. was formed in 1976 by Managing Director and Owner, Mr. David Thomas, as a small local stockholder serving the people and businesses of West Wales. Since then, through unrivalled personal service, coupled with a programme of continuous investment in warehouses, machinery and vehicles, Dyfed Steels has expanded to employ over 250 people at 10 sites throughout Wales, the West of England, West Midlands and Essex and has now become one of the largest independent steel stockholder and processors in the region, with the distribution of steel throughout the UK

Dyfed Steels' major processing facilities are located in Llanelli. The headquarters and main warehouse at Dafen. where a full range of manufacturing facilities are available – encapsulating sawing, shot blasting, painting, presses, shears, guillotines, folding, drilling, cropping and punching.

The Company strives to maintain the highest quality of service to achieve customer satisfaction, and constantly review procedures to improve standards whenever possible, with an annual turnover of £60m.

#### **Our supply chains**

Our supply chains include: distribution throughout the UK, primarily throughout Wales, West of England, West Midlands and Essex.

#### **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.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues and as a result have put in place a designated Modern Slavery and Human Trafficking Policy which shall be reviewed annually.



DYFED STEELS LTD

Our Modern Slavery and Human Trafficking Policy demonstrates 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 initiative to identify and mitigate risk we operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-bribery policy;
- Positive Work Environment Policy;
- Equal Opportunity Policy;
- Supply chains evaluation and preferred supplier list;
- Recruitment process;
- Monitor potential risk areas in our supply chains; and
- Protect whistle blowers.

#### **Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme which requires audit of the company prior to becoming part of our supplier list, part of which is the requirement to ensure they are compliant with anti slavery measures.

We have a compliance team, which consists of top management from all depots and our Head Office:

The compliance team is led by our **Company Secretary, AJ Morgan**.

#### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we conduct training to our buying team so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

#### **Our performance indicators**

We shall carry out audits 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. These audits shall be based on whether or not we receive reports from employees, the public, or law enforcement agencies in this regard.

#### **APPROVAL FOR THIS STATEMENT**

This statement was approved by the Managing Director of Dyfed Steels Ltd on (date of last accounts)

NAME: DAVID THOMAS

SIGNATURE:

11.10.2019