

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

As a global company, we are mindful of the role we play to eliminate the exploitation of individuals at the hands of others. We are equally aware of the operational disruption that our business could face from the identification of Modern Slavery within our supply chains.

This statement sets out our commitment as well as the steps we have taken and are taking to prevent Modern Slavery in our organisation and supply chain.

Organisations' Structure

The AMC Group includes various businesses in the trading and manufacturing industries worldwide. In accordance with the Home Office guidance, we publish this statement at the Group level and this statement covers the following UK subsidiaries, who are also required to publish:

Amalgamet Limited

Mil-Ver Metal Company Limited

William Rowland Limited

This statement is also available on the websites of those subsidiaries.

Our Business

We operate a number of specialist businesses focused on both managing price risk in non-ferrous metal supply chains and the provision of base metals, minor metals, alloys and other added value products for industrial consumers.

Our trading activities include risk management services provided as a Ring Dealing Member of the London Metal Exchange and as a broker on other global commodity exchanges and the worldwide supply of a full range of base and minor metals.

On the other hand, our industrial activities provide the manufacturing and construction sectors with metals, intermediate and added value products with an emphasis on metal price risk management, quality, reliability and service.

Our Policy on Slavery and Human Trafficking

AMC Group's policy is to condemn the use of forced, bonded or indentured labour, involuntary prison labour, slavery, servitude or trafficking of persons against their will. Furthermore, we seek to ensure that no party to our business transactions is involved in such practices so that it is compliant with the legislation and therefore our business is conducted with the utmost levels of humanity and integrity.

Structure and supply chains

We want to ensure that our suppliers, including contractors, have lawful business practices. We conduct Know Your Supplier processes on our suppliers to ensure this. We have no tolerance for human rights violations; we expect our supply chains to operate safe, healthy and fair workplaces; and business practices that minimise environmental impact where possible.

Risk Assessment

In line with the OECD standards for multinational companies, we adopt a risk based approach to slavery and human trafficking. In areas where the risk is deemed to be high, more detailed due diligence is undertaken together with supply chain certification where necessary. Our assessments are:

- Supply chain providers based in the UK are expected to have suitable anti-slavery and human trafficking policies, but we ask our staff to remain vigilant for any exceptions.
- Supply chain providers based in the OECD are expected to be low risk, and we expect these entities to comply entirely with the employment legislation of the country where they are based.
- Supply chain providers based in certain countries outside the OECD where the risk of Modern Slavery is perceived to be higher must confirm adherence to compliance with our policy or a comparable policy. Where no such statement is available in writing, additional due diligence may be necessary, including Know Your Supplier checks which will be the responsibility of the relevant Group company.

Training

In 2015, we made our Modern Slavery Policy available in an accessible area of our website and our intranet. Training in respect of Modern Slavery is part of our Know Your Supplier training for supply chain and purchasing managers.

Our checks and balances

Our policy is to ensure:

- We perform checks on our labour, payroll and right to work documentation to protect against Modern Slavery
- We communicate our expectations and values to our supply chain
- We regularly review our supply chain policies, Know Your Supplier checks, and working practices

Reporting suspicions

Employees can report any suspicions of Modern Slavery within the Group directly to the AMC Board or externally. Details are set out below:

<https://www.modernslaveryhelpline.org/>

Annual Review

The most recent financial year end for the AMC Group was 31 December 2018. The Board of the AMC Group approved this statement on 12th April 2019 and this statement was published on 16th April 2019. It will be reviewed again and, to the extent updated, republished within six months of the next financial year end, 31 December 2019.

David Sher
Group Managing Director
12th April 2019