

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR CONTINENTAL ALLOYS & SERVICES LIMITED (CAS) FOR THE YEAR ENDED 31 DECEMBER 2018**

This Modern Slavery and Human Trafficking Statement, made pursuant to section 54 of the Modern Slavery Act 2015, summarises the steps we have taken as a business to address the risk of modern slavery and human trafficking in our operations and supply chains.

### **1. OUR ORGANISATION, STRUCTURE AND SUPPLY CHAINS**

Continental Alloys & Services Ltd is part of the Reliance Steel & Aluminum Co. family of companies ([www.rsac.com](http://www.rsac.com)). The primary function of our business is the distribution of metal and manufactured products to companies in the oil and gas industry.

### **2. OUR APPROACH AND POLICIES**

#### **Employment Handbook**

The CAS Employment Handbook applies to everybody who works for our company, whatever their job and wherever they are located. The Employment Handbook includes a section on our commitment to creating a positive work environment and also a whistleblowing policy. During 2017 we added a policy on Modern Slavery and Human Trafficking. All employees are required to adhere to the Employment Handbook. Any subcontracted labour would be subject to the same adherence.

#### **Group Policies**

The CAS Employment Handbook is supported by a number of Reliance Group-level policies which set out minimum standards to be incorporated into our risk management and internal control systems throughout our businesses.

#### **Supplier Evaluation and Due Diligence Processes**

We undertake due diligence when considering taking on new suppliers. To date, we have reviewed all of our key suppliers and are currently undergoing the process of reviewing the balance of suppliers. This due diligence includes: understanding our supply chain to identify and assess product or geographical risks of modern slavery and human trafficking, evaluating modern slavery and human trafficking risks through supplier management and terminating our relationship with suppliers that fail to improve their performance in line with an action plan or violate our stance on modern slavery. Also during 2017 we updated our terms and conditions of purchase and sale, which highlights our stance to all suppliers and customers alike our commitment to our intolerance to modern slavery in our business practices and dealings.

### 3. OUR EVALUATION OF RISK

#### a. Risk of slavery and human trafficking in our business

Taking into account the level of senior management oversight, the absence of any significant subcontractor relationships and the absence to date of reports of concerns or incidents regarding forced labour, CAS considers the risk of slavery or human trafficking occurring within our direct employee population to be very low.

#### b. Risk of slavery and human trafficking in our supply chain

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to declare that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

This statement applies to the financial year ending 31 December 2018 and was approved by the Board.

Signed by Jim Gibb, Managing Director, Continental Alloys & Services Limited

A handwritten signature in black ink, appearing to read 'Jim Gibb', is written over a horizontal dotted line.