Anti-Slavery Policy Statement

The Brock Metal Company Ltd has a zero-tolerance approach to slavery and is committed to preventing acts of slavery and human trafficking from occurring within both its business and its supply chain. The Brock Metal Company Ltd expects these same high standards from its suppliers, contractors and other business partners.

Company Structure

The Brock Metal Company is the largest manufacturer of zinc alloys in the UK. It produces over 40,000 tonnes of alloys a year, of which approximately 40% is supplied to UK customers and 60% is exported, predominantly to customers in Europe.

The raw materials used in our products are high value metals. As such we procure goods in excess of £90 million per year despite being a business of just 34 people. 98% of our total procurement value arises from purchases from just 3 materials suppliers but we also work with a small number of subcontractors and partners each of which will have their own subcontractors. We are therefore connected to multiple businesses across many countries.

Actions Supporting our Anti-Slavery Policy

In support of our Anti-Slavery Policy we have:

- Made our employees aware of the Modern Slavery Act, including its definitions of slavery and human-trafficking
- Repeated the training within 2 years of first delivery and ensured all employees who have joined the business in the last 2 years have been trained
- Told employees what to do if they suspect a case of slavery or human trafficking
- Contacted our main suppliers and partners to check what assurance arrangements they have in place
- Revised our main procurement contracts to require compliance with the legislation and to include prohibitions in respect of slavery and human trafficking

Registered Office: The Brock Metal Company Limited, Walsall Road, Cannock, Staffs, WS11 9NR. UK.
Registered in England 6164695
• Reviewed our Whistleblowing Policy
• Included it as an agenda item in the Annual Quality Review to review any concerns that have been and the effectiveness of the policy

The above procedures are designed to:

• Identify and assess potential risk areas in our business and supply chains
• Reduce the risk of slavery and human trafficking occurring in our business and supply chains
• Monitor potential risk areas in our business and supply chains
• Provide adequate protection for whistle blowers

This statement is made in accordance with section 54(1) of the Modern Slavery Act and constitutes the slavery and human trafficking statement of The Brock Metal Company Ltd for the financial year ending 31st December 2019

[Signature]

Gerard Keane
The Brock Metal Company Ltd

November 2018