

# Fowle & Co.

## Steel Stockholders & Processors

### **STATEMENT UNDER THE UNITED KINGDOM MODERN SLAVERY ACT, 2015 FOR THE YEAR JANUARY – DECEMBER 2019**

Fowle & Co Ltd is a steel stockholder and processor with a relatively small number of employees, currently around 35 members of staff. The company is owned and run by members of the Fowle family and has been established since 1970.

Fowle & Co Ltd respects all human rights, of employees and to the local community, and is committed to promoting these principles to its suppliers.

Our policy has always been to pay all members of staff a wage or salary on which they would be able to live rather than exist. Our average staff remuneration is well above the average income currently in the UK.

Our suppliers must always comply with the most demanding requirements, whether relevant applicable laws, the Human Rights Policy or this Code. Where local laws prohibits the supplier from upholding certain aspects of the Code or the Human Rights Policy, the supplier should comply with local laws while seeking to respect human rights.

Fowle & Co Ltd opposes the use of forced or compulsory labour, human trafficking and all forms of human rights violations known as 'modern slavery', within our own operations and through our supply chain.

Fowle & Co Ltd requests its suppliers to develop and implement policies and procedures to ensure respect of all human rights in their businesses, and those of their suppliers.

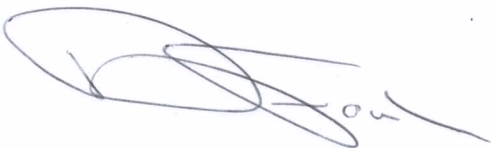
Our suppliers are committed to using raw materials of legal and sustainable origin and not to source 'conflict minerals' contributing to finance armed conflicts and enable human rights abuses. Our suppliers maintain due diligence processes to achieve compliance with this commitment and requests relevant suppliers to fully support Fowle & Co Ltd in this effort.

Fowle & Co Ltd comply with international anti-bribery standards as stated in the United Nations' Global Compact and local anti-corruption and bribery laws including The Bribery Act 2010.

Management undertake a review of policy implementation in order to identify further areas or opportunities for continuous improvement.

All employees are required to be trained and to refresh their training on our company policies and ethics.

Approved by the board of directors of Fowle & Co Ltd, December 12<sup>th</sup> 2018, and will be reviewed annually.



Alan Fowle  
Director