

## **Modern slavery statement for financial year 2017/18**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that S Norton & Co Ltd 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 encompasses slavery, servitude, human trafficking and forced labour.

S Norton & Co Ltd has a zero-tolerance approach to any form of modern slavery. 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 within the business or our supply chain.

### **Our business**

S Norton & Co Ltd is one of the top metal recycling companies in the UK. Our core business is the recycling of both ferrous and non-ferrous scrap metal.

The scrap metal is recycled to internationally recognised standards ready for export. Each year we collect, process and export around 1.5 million tonnes of metal to a wide range of consumers from small refineries to global organisations.

We employ over 170 employees, and have operating sites in Liverpool, Manchester, Southampton and London. Our Corporate Head Office is also based in Liverpool.

S Norton & Co Ltd is committed to delivering high standards of corporate governance and we aim to employ the highest ethical and professional standards and always to comply with all relevant laws and regulations applicable to our business.

S Norton & Co Ltd is committed to preventing slavery and human trafficking in its corporate activities and its supply chains. This commitment is supported by our employee training programmes and company policies. We also expect the same high standards from those parties with whom we engage, such as our suppliers and customers.

### **Our high risk areas**

Due to the nature of our business and our approach to governance, we assess that there is very low risk of slavery and human trafficking in our business and supply chains. However, we aim to periodically review the effectiveness of the relevant policies and procedures that we have in place.

### **Our policies**

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

#### **1 Anti-slavery policy**

This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help

#### **2 Recruitment policy**

We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will

#### **3 Whistleblowing policy**

We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals

#### **4 Code of business conduct**

This code explains the way we behave as an organisation and how we expect our employees and suppliers to act

#### **Our suppliers**

As part of our initiative to identify and mitigate risk, S Norton & Co Ltd have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle blowers

S Norton & Co Ltd operates a supplier policy and we conduct due diligence on all suppliers. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and where practicable, on site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- 1 They have taken steps to eradicate modern slavery within their business
- 2 They hold their own suppliers to account over modern slavery
- 3 They pay their employees at least the national minimum wage / national living wage (as appropriate)
- 4 They pay their employees any prevailing minimum wage applicable within their country of operations
- 5 We may terminate the contract at any time should any instances of modern slavery come to light

#### **Training**

We regularly conduct training for the appropriate staff 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 will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

#### **Approval for this statement**

This statement was approved by the Board of Directors

Name (Director) *MARGARET HARRY*

Signature *M Harry*

Date *30.04.17*