

	<h1>Human Trafficking and Exploitation Policy</h1>	Doc Ref: JSS-SMS-015-PL Review: 31/01/2025 Page 1 of 3 Revision: 1.00
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James Street Steel is committed to combating human trafficking, exploitation, and all forms of modern slavery. We recognise the importance of upholding human dignity, fairness, and the rights of individuals across our operations, supply chains, and relationships. This policy outlines our commitment to preventing and addressing human trafficking and exploitation within our workplace, business practices, and supply chains.

Scope

This policy applies to all employees, contractors, suppliers, business partners, and third parties engaged with **James Street Steel**, regardless of their location. It covers all aspects of human trafficking and exploitation, including recruitment, employment, and service provision.

Policy Principles

1. Zero Tolerance for Human Trafficking and Exploitation

James Street Steel has a strict zero-tolerance policy towards human trafficking, forced labour, and all forms of exploitation, including sexual exploitation, labour exploitation, and child trafficking. We do not tolerate any actions or behaviours related to the trafficking or exploitation of individuals in any part of our operations or supply chain.

2. Compliance with Legal Standards

We will comply with all local, national, and international laws, conventions, and regulations concerning human trafficking and exploitation, including the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, and the International Labour Organisation (ILO) standards. We will ensure that our policies and practices reflect the highest legal and ethical standards.

3. No Forced or Bonded Labor

James Street Steel strictly prohibits the use of forced, bonded, or indentured labour in any form. All workers must enter employment voluntarily, and no individual will be subjected to coercion, threats, or withholding of wages, passports, or identity documents as a means of control.

4. Child Labor

We are committed to the protection of children's rights and prohibit the use of child labour. We will ensure that all workers meet the minimum age requirements for

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employment as defined by local laws and international labour standards. Children under the legal working age will never be employed in any role within our organisation or supply chain.

5. Ethical Recruitment Practices

We are committed to ethical recruitment practices, ensuring that all individuals seeking employment with **James Street Steel** or within our supply chain are recruited through transparent and fair processes. We will not engage in practices that mislead, deceive, or exploit job seekers. Employment terms will be clearly communicated in writing, including compensation, job duties, working hours, and conditions.

6. Training and Awareness

James Street Steel will provide regular training to employees, contractors, and suppliers about the risks of human trafficking and exploitation, and how to identify, report, and prevent such activities. We will ensure that staff members at all levels are aware of the signs of trafficking, the impacts of exploitation, and the resources available to victims.

7. Whistleblower Protection and Reporting Mechanism

We have established a clear and confidential process for employees, contractors, and suppliers to report concerns regarding human trafficking or exploitation. We encourage individuals to report any suspected violations without fear of retaliation. All reports will be investigated thoroughly, and appropriate corrective action will be taken.

8. Due Diligence in Supply Chains

James Street Steel will conduct due diligence on all suppliers, contractors, and third-party partners to assess and prevent the risk of human trafficking and exploitation within our supply chains. We expect all business partners to comply with this policy and to implement their own anti-trafficking measures. We will take corrective action, including terminating relationships, if any partner is found to engage in trafficking or exploitation.

9. Support for Victims of Human Trafficking and Exploitation

In cases where human trafficking or exploitation is identified, **James Street Steel** will provide support to victims, including access to emergency services, legal assistance, and reintegration programs. We will collaborate with relevant authorities and NGOs to ensure that victims receive the protection and care they need.

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10. Monitoring and Continuous Improvement:


James Street Steel will regularly review and assess the effectiveness of our policies, practices, and procedures to combat human trafficking and exploitation. We will take necessary steps to continuously improve our approach and ensure compliance with evolving standards and best practices. This includes conducting audits and risk assessments across our operations and supply chains.

Governance and Responsibility

The responsibility for ensuring the effective implementation of this policy lies with senior management, with oversight provided by the compliance and human resources departments. All employees, contractors, and suppliers must adhere to the standards outlined in this policy. Failure to comply with this policy will result in disciplinary action, which may include termination, legal action, or termination of business relationships.

Conclusion

James Street Steel is committed to the eradication of human trafficking, forced labour, and exploitation in all its forms. Through the implementation of this policy, we pledge to uphold the rights of all individuals and work proactively to prevent human trafficking and exploitation within our operations and supply chains. We will continue to monitor, review, and improve our efforts to ensure that we uphold the highest standards of ethical behaviour and contribute to the fight against modern slavery.

Signature: 
James Street Steel Managing
Director

Date: 31/01/2025