John R Adam & Sons Ltd

Glasgow

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT.

At John R Adam & Sons (Holdings) Ltd., we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain.

We have taken positive steps to tackle modern slavery as outlined in our statement. This statement sets out the steps we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2020.

**Our Business and supply chain**.

John R Adam & Sons (Holdings) Ltd

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John R Adam & Sons Ltd.

Metal Recyclers

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Thistle Metals Ltd. Smillie Metallics (Midlands) Ltd.

Metal Recyclers Processors & exporters of Furnace Residues

We are located in Scotland with a subsidiary in England.

We establish a relationship of trust and integrity with all our suppliers which is built on mutually beneficial factors. Our supplier and customer selection includes due diligence of the supplier’s reputation their respect for the law, compliance with health and safety and environmental standards, and references.

We haven’t been made aware of any allegations of modern slavery/human trafficking activities against any of our suppliers or customers. If we were made aware, we would act immediately, against the supplier or customer and report the matter to the authorities.

Risk Assessment:

In the past year, we conducted a risk assessment of our supply chain by taking into account:

The risk profile of individual countries based on the Global Slavery Index.

The business services rendered by the suppliers.

The presence of vulnerable demographic groups.

A news analysis and the insights of labour and human rights groups.

This assessment determines our response and the risk controls that we implement.

**Policies:**

The Adam group operates the following policies for identifying and preventing slavery and human trafficking in our operations:

Whistleblowing policy: we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.

Code of Conduct: our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business.

**Supplier due diligence**:

John R Adam & Sons Ltd conducts due diligence on all new suppliers and on existing suppliers at regular intervals. This includes:

Assessing risks in the provision of services.

Checking the suppliers, and their health and safety standards and labour relations.

Requiring improvements to substandard employment practices.

**Awareness:**

John R Adam & Sons Ltd has raised awareness of modern slavery informing the workforce of:

Our commitment in the fight against modern slavery.

Red flags for potential cases of modern slavery or human trafficking.

How employees should report suspicions of modern slavery.

This statement covers the financial year 1st January 2020 to 31st December 2020 and has been approved by the board of directors of John R Adam & Sons Ltd.

D S McWatt

Financial Director.

12 May 2021