Ireland Alloys Ltd

Modern Slavery and Human Trafficking Policy

1. Policy Statement

Ireland Alloys Ltd is committed to conducting all aspects of its business in an ethical and transparent manner. We have a zero-tolerance approach to modern slavery and human trafficking in any part of our operations, supply chains, or business relationships.

We fully support the principles of the **Modern Slavery Act 2015** and relevant **Scottish legislation and guidance**, ensuring that slavery, servitude, forced labour, and human trafficking have no place within our company or our supply chain.

2. Scope

This policy applies to:

- All employees, directors, and officers of Ireland Alloys Ltd.
- Contractors, suppliers, and other business partners acting on our behalf.
- All business operations conducted within Scotland, the wider UK, and internationally.

3. Our Business

Ireland Alloys Ltd operates as a specialist metal recycling and processing company based in Scotland. Our activities involve sourcing, handling, and processing metal alloys for resale to industrial clients. Given the nature of our business, we recognise the potential risks of modern slavery within supply chains — particularly where raw materials or labour-intensive services are involved.

4. Our Commitments

Ireland Alloys Ltd will:

- Conduct business in a manner that prevents modern slavery and human trafficking.
- Ensure compliance with the Modern Slavery Act 2015 and relevant Scottish law.
- Identify and assess potential risk areas within our supply chains.
- Require all suppliers and contractors to confirm adherence to ethical labour practices.
- Train relevant employees to identify and respond to potential indicators of modern slavery.

- Report any concerns or suspicions immediately to senior management.

5. Supply Chain Management

We expect all our suppliers, contractors, and business partners to uphold the same high standards.
To this end, we will:

- Include anti-slavery clauses in supplier contracts.
- Undertake due diligence before engaging new suppliers.
- Review supplier compliance on a regular basis.
- Take appropriate action, including termination of contracts, if non-compliance is identified.

6. Risk Assessment and Due Diligence

We assess risks of modern slavery and human trafficking based on:

- Country of operation and source of materials.
- Nature of goods or services provided.
- Labour practices and working conditions reported by suppliers.
- Feedback from employees and external audits.

Where higher risks are identified, additional due diligence, monitoring, and supplier engagement will be carried out.

7. Training and Awareness

Ireland Alloys Ltd will provide regular training to relevant staff to ensure:

- Awareness of modern slavery and human trafficking indicators.
- Understanding of how to report concerns.
- Compliance with internal procedures and external legal obligations.

8. Reporting Concerns

Employees and partners are encouraged to raise concerns regarding any suspicion of slavery or human trafficking. Reports can be made confidentially through our internal reporting procedure or directly to management. All concerns will be investigated thoroughly, and appropriate action will be taken.

No employee will suffer any detriment for raising a genuine concern in good faith.

9. Monitoring and Review

This policy will be reviewed annually by senior management to ensure its ongoing effectiveness and compliance with UK and Scottish law. Updates will be made as required to reflect changes in legislation or company operations.

10. Responsibility

Overall responsibility for this policy rests with the Board of Directors of Ireland Alloys Ltd. Management at all levels is responsible for ensuring that employees understand and comply with this policy.

11. Approval

This statement is made pursuant to **section 54(1) of the Modern Slavery Act 2015** and constitutes Ireland Alloys Ltd.'s slavery and human trafficking statement for the financial year ending **31 July 2027**.

Signed:

Stuart Douglas
Managing Director
Ireland Alloys Ltd
1.7.26