

**Slavery and Human Trafficking Statement  
Tata Steel Europe Limited and its Subsidiaries  
Year-Ending 31 March 2019**

The UK Modern Slavery Act 2015 requires certain businesses to publish a statement setting out the steps taken in the previous financial year to ensure that slavery and human trafficking is not taking place in their own business or supply chain.

Tata Steel Europe Limited is publishing this statement on behalf of itself and its relevant subsidiaries. The policies and procedures referenced in this statement apply to all Tata Steel Europe entities.

**Who We Are**

Tata Steel Europe is one of Europe's leading steel producers, part of the global Tata Steel Group. Our main steelmaking operations are in the UK and Netherlands, supported by an extensive network of service centres across the EU for the distribution and further processing of steel products, and a worldwide network of sales offices. As at end-March 2019, Tata Steel Europe employed some 21,500 people, with around 8,600 in the UK.

**Our Principles**

The Tata Group was founded on the principle that its activities should always benefit society. The Tata Values – Integrity, Responsibility, Excellence, Pioneering, Unity – continue to guide Tata Steel Europe's vision to be the global benchmark for value creation and corporate citizenship in the steel industry.

For Tata Steel Europe, our mission is to build the leading European steel business that is sustainable in every sense. This will help ensure future success, as well as develop a business that has a positive, lasting impact on the industry and its communities.

The core Tata Values underpinning this strategy are Integrity and Responsibility. These require that we always act responsibly and are responsive towards the countries, communities and environments in which we work, and that we conduct business fairly, with honesty and transparency. We recognise the wider responsibility we have as a good corporate citizen to ensure the highest ethical standards are maintained, including aiming to ensure that slavery and human trafficking is not present in our business or supply chain.

**Policies and Procedures**

We are proud of our ethical principles as articulated in the Tata Code of Conduct, to which all Tata Group companies subscribe. The Code requires Tata companies and

employees to act with professionalism, honesty and integrity, and to preserve the human rights of every individual and the community.

Tata Steel Europe's governance framework flows from a set of Group Policies, intended to promote ethical and legally compliant business conduct, which set the principles and behaviours to which we and our employees are required to adhere. The principles of the Tata Code of Conduct apply to all our dealings with our business partners who are encouraged to operate to similar standards.

### **People in Our Business**

Our employees remain at the core of our business success. All Tata Steel Europe employees are recruited in accordance with clear HR policies and procedures designed to comply with all applicable legislation, including checks for immigration status and ensuring compliance with national minimum wage and other employment regulations.

Tata Steel Europe supplements its internal resources from time to time with support from third party services. This can range from the use of specialist consultants on secondment to the business for a short period, to outsourcing non-core services to third party suppliers. This includes the use of temporary agency workers to provide the flexibility to react to and support operating requirements across all areas of the organisation as required.

We work with a number of employment agencies, all appointed in accordance with our procurement processes (including pre-qualification and subsequent checks) and our Responsible Procurement Policy. Each employment agency implements an on-boarding process for our temporary staff and provides on-going management, supplemented by specific local area induction processes and training. We require the agencies to check workers are fit and eligible for work as part of the on-boarding process. We also expect these agencies to adopt management practices that mirror our own in providing a high level of safeguarding for their workers.

### **Supply Chain Overview**

Tata Steel Europe spends over £6 billion each year on goods, services and raw materials to support its steelmaking, processing, and distribution operations worldwide. To meet company needs, procurement is organised globally into four main category groups: Goods, Services, Process Materials & Strategic Procurement. Procurement teams are also organised geographically to complement this category organisation and support business operations across the world. Sourcing may be carried out at a local, national or global level.

### **Responsible Procurement**

Tata Steel Europe updated and reaffirmed its Responsible Procurement Policy during 2018/19, embracing the OECD Due Diligence Guidance for Responsible Business Conduct. This restates our commitment to ensuring our supply chain is transparent and meets our minimum Health & Safety, Human Rights, Ethical and Environmental standards. These standards are set out in our Supplier Code of Conduct, which Tata Steel Europe expects all suppliers to comply with. Specifically, we expect our suppliers to develop and implement policies and procedures to promote and protect human rights in their business and to encourage their suppliers to do likewise.

We require suppliers operating in regions recognised as having a higher risk of human rights abuse, including slavery and human trafficking, to adopt suitable and robust

policies and procedures to prevent such abuses. This could include having suitable accreditation (e.g. SA 8000). If no suitable accreditation exists, a supplier is required to provide evidence that their policies cover the key elements of SA8000, including there being no forced labour in their operations.

### **Monitoring**

Tata Steel Europe recognises the need to be vigilant to identify the risks and address any potential impacts associated with slavery and human trafficking.

The risk of human rights abuses in the supply chain, including slavery and human trafficking, is included and monitored as part of our Responsible Procurement Policy. As part of the supplier qualification process, due diligence is undertaken to determine whether the minimum standards of our Supplier Code of Conduct are met. Such checks are now embedded into our 'business as usual' sourcing processes. This applies for all new suppliers, with existing suppliers also subject to the same stringent checks and controls through regular review and revalidation.

Strategic primary raw materials (i.e. iron ore, coal and coke) and certain process materials (such as tin and zinc) are products which are often sourced from higher risk countries. We monitor these procurement categories carefully and aim to ensure that the origin of the material is always known and that purchases are made from verified sources. Over 95% of our iron ore, coal and coke purchases are sourced directly, giving us more control over the supply chain than through indirect supplies.

### **Reporting Concerns**

Systems are in place to encourage the reporting of concerns. In addition to our own internal processes, employees and suppliers are encouraged to use our Confidential Reporting System to report any concerns they may have. This is an independently-run service which enables concerns about any aspect of how we operate to be reported on a confidential (or anonymous) basis. The number of confidential helpline calls received is monitored and reported to the Audit Committee of Tata Steel Europe on a quarterly basis. Any reported concerns are investigated thoroughly.

### **Raising Awareness**

Tata Steel Europe uses a variety of means to raise employees' awareness of its policies and ethical standards. This includes e-learning and face-to-face training, internal communications and awareness sessions. Induction processes are in place to ensure that new staff are introduced to key policies and expectations, including the Tata Code of Conduct.

During the past year, as in previous years, through tailored training, briefing and communications, we have sought to raise the awareness and improve the understanding of the specific risks of modern slavery and human trafficking, particularly with those colleagues working in HR and Procurement who are most likely to encounter such risks.

We have also sought to raise awareness with our suppliers through our supplier portal ([www.tatasteelsuppliers.com](http://www.tatasteelsuppliers.com)). This provides access to our Responsible Procurement Policy, and the Tata Code of Conduct, as well as the standard purchasing terms, and the Confidential Reporting System.

Over the coming financial year we will continue to strengthen our approach to managing the risk of human trafficking and modern slavery within our business, a specific major activity being a supplier revalidation programme in relation to our Supplier Code of Conduct.

In parallel, we will continue to ensure that our strategy is responsive to changing risks and that we maintain appropriate safeguards to prevent modern slavery.

Signed:



Director, Tata Steel Europe Limited

Date: 26 September 2019

The policies and procedures referenced in this statement apply to all Tata Steel Europe entities.

Appendix A attached lists the subsidiaries considered to meet the specific criteria set out in the UK Modern Slavery Act 2015.

This statement is issued by Tata Steel Europe on its own and their behalf.

**Slavery and Human Trafficking Statement  
Tata Steel Europe Limited and its Subsidiaries**

**Appendix A**

The following subsidiaries are considered to meet the specific criteria set out in the UK Modern Slavery Act 2015 and this statement is issued by Tata Steel Europe on its own and their behalf:

Tata Steel UK Limited, UK  
Cogent Power Limited, UK  
Tata Steel IJmuiden BV, Netherlands  
Service Centre Maastricht BV, Netherlands  
Tata Steel Maubeuge SAS, France  
Hille and Müller GmbH, Germany  
Layde Steel S.L, Spain  
Inter Metal Distribution SAS, France  
Montana-Bausysteme AG, Switzerland  
Fischer Profil GmbH, Germany  
Unitol SAS, France