

**Slavery and Human Trafficking Statement
Tata Steel UK Limited and its Subsidiaries
Year-Ending 31 March 2023**

**The following Slavery and Human Trafficking Statement was approved by the
Tata Steel UK Board on the 24 August 2023**

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 UK 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 UK subsidiary companies.

Who We Are

Tata Steel UK Limited is the UK's largest steel producer and is part of the global Tata Steel Group. Tata Steel UK Limited is Tata Steel's main operating entity in the UK with its primary steel making operations located at Port Talbot South Wales and is supported by a network of downstream operations and service centres across the UK and the EU for the distribution and further processing of steel products, and a worldwide network of sales offices. As at the end March 2023, Tata Steel UK employed some 8,051 people 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's vision to be the global benchmark for value creation and corporate citizenship in the steel industry.

The core Tata Values guiding our activities 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 that stands the test of public scrutiny. 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 UK's governance framework includes a set of 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 UK 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 UK 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 UK spends approximately £1.2 billion on raw materials including coke, iron ore and coal and a further £1.5 billion each year on goods, services, and materials to support its steelmaking, processing, and distribution operations worldwide. Procurement is organised to meet the needs of the Company's geographical footprint and the UK value chain.

Responsible Procurement

Tata Steel UK has a Responsible Procurement Policy which, embraces the OECD¹ Due Diligence Guidance for Responsible Business Conduct and which has been regularly reviewed and updated, with the Responsible Procurement Policy last reviewed in December 2022.

Responsible Procurement generates a systematic evaluation of the entire supply chain. We are determined to collaborate with our suppliers to continuously improve the processes with respect to this policy. This policy applies to all goods and services as supplied to Tata Steel by our immediate suppliers and their respective entire supply chains. Our Responsible Procurement Policy is guided by five key principles: Health and Safety, Fair Business Practices, Environmental Protection, Human Rights and Local Community Development. During the onboarding process these principles are mandatory requirements which are evaluated based on risk prior to doing any business with a Group company.

Additionally, any suppliers looking to engage with the Company must declare their commitment to the responsible sourcing expectation during onboarding. This information is currently held within two onboarding systems, a legacy platform, and a new system. There is work being undertaken to ensure all existing and new suppliers are onboarded to the new system, and as at FY23 27% of legacy suppliers have been requalified under the new system. The priority for FY24 and beyond being to increase this number.

The Policy demonstrates our commitment to ensuring our supply chain is transparent and meets our Health & Safety, Human Rights, Ethical and Environmental standards. These standards are set out in our Supplier Code of Conduct, which Tata Steel UK expect 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 UK recognises the need to be vigilant in the prevention and detection of modern slavery, through the identification of risks and addressing any potential impacts.

¹ OECD – Organisation for Economic Co-operation and Development.

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.

Due diligence and risk assessments are undertaken through our Procurement sourcing activities and documented as part of the supplier on-boarding process to determine whether the standards of our Supplier Code of Conduct are being met. During the on-boarding process we perform robust screening of suppliers that include risks associated with Responsible Sourcing standards and policies, modern slavery and human trafficking, supply chain, and trade sanctions risks.

Periodic monitoring of approved suppliers is conducted through supplier visits and performance reviews. Where high risks are identified as part of supplier monitoring activities, supplier audits are utilised either prior to final approval or throughout the supplier life-cycle relationship. In addition, subject to the risks identified, suppliers are subject to further due diligence screening and revalidation of supplied information on an annual cycle.

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. Tata Steel UK monitors 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 Tata Steel UK's iron ore, coal and coke purchases are sourced directly, giving greater transparency over our primary raw material supply chain.

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 reviewed by the Company's Compliance and Integrity Committee which comprises senior management representatives and meets quarterly. The Audit Committee of Tata Steel Europe Limited, as the main holding company for the Tata Steel Europe Group of companies also receive reports on a bi-annual basis. Any reported concerns are investigated thoroughly. No reports were received or investigations undertaken in respect of modern slavery or human trafficking during the 2022-23 financial year.

Raising Awareness


Tata Steel UK 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. <https://www.tatasteeeurope.com/ts/suppliers>. 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. We continue to revalidate our key suppliers as part of the Supplier revalidation programme, and we will continue to do so in the coming financial year. We also 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 UK Limited

Date: August 2023

The policies and procedures referenced in this statement apply to Tata Steel UK Limited and its subsidiary entities

On 1st October 2021, the UK and mainland Europe (MLE) businesses of Tata Steel Europe separated to form the UK and MLE Value Chains.

Tata Steel UK Limited is the main operating entity of the UK Value Chain.

A separate statement has been produced by Tata Steel Europe on behalf of itself and its subsidiary entities in the MLE Value Chain considered to meet the specific criteria set out in the UK Modern Slavery 2015.

This statement is issued by Tata Steel UK Limited on its own behalf and on behalf of its relevant subsidiaries as listed in Appendix.

Slavery and Human Trafficking Statement
Tata Steel UK 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 UK on its own and their behalf:
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Surahammars Bruks AB, Sweden
