

MODERN SLAVERY STATEMENT **FOR FINANCIAL YEAR ENDED 31 DECEMBER 2018**

We are committed to improving our practices to combat slavery and human trafficking. This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Ronly Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within the business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Ronly has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Ronly Group Limited and its subsidiaries, registered in England and Wales, are a group of traders of metallurgical and agricultural commodities and investors in related businesses. We operate in the following sectors:

Steel - supplying inputs to global steel producers and selling semi-finished products to UK and Irish processors.

Grains – trading of bulk agricultural commodities internationally.

Edible fruit and nuts – buying of products at source for sale to confectionary, baking and packing customers in the UK and Europe.

Our high risk areas

Ronly is exposed to the risks of modern slavery in the supply chain when contracting with international producers of goods and furthermore in the subcontracting of transport and warehousing activities to specialist companies.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we undertake robust due diligence procedure to make sure that our supply chains and overall trade corresponds with our policies.

We have in place systems to:

1. Identify and assess potential risk areas in our supply chains.
2. Mitigate the risk of slavery and human trafficking occurring in our supply chains.
3. Monitor potential risk areas in our supply chains.
4. Protect whistle blowers.

Our policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Our suppliers: monitoring and auditing

Ronly operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

Actions taken to remediate or reduce risk.

In addition to the above, as part of our contract with suppliers, we require that:

1. Suppliers shall not engage in any activity, practice or conduct that would constitute an offence.

2. Suppliers represent and warrant that at the date of each purchase order neither the supplier nor any of its officers, employees or other persons associated with it has been convicted of any offence involving slavery and human trafficking; and having made reasonable enquiries, so far as it is aware has been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery and human trafficking.
3. Suppliers shall implement due diligence procedures for their subcontractors, and suppliers, to ensure that there is no slavery or human trafficking in its supply chains.
4. Suppliers undertake not to purchase any raw materials or sources that has been sourced from producers or manufacturers using forced labour in its operations.

Training

Staff are informed to be aware of the signs of the key signs of modern slavery, as enclosed:

- Victims may be fearful, anxious, depressed, submissive, tense, or nervous/paranoid, appear withdrawn, avoid eye contact, show signs of physical and/or sexual abuse, physical restraint, confinement, or torture;
- Victims may not be allowed to travel on their own.
- Victims rarely interact with others, are unfamiliar with their neighbourhood or where they work and seem under the control of others.
- Victims might have few or no personal possessions, not be in control of his/her own money, have no financial records, or bank account.
- Victims may wear the same clothes day in day out or clothes be inappropriate for the work being done.
- Victims may receive little or no payment, have no access to their earnings, be disciplined through punishment or fines.
- In shipping, suspicious or uncooperative behaviour by master or by ship's employees/service men may be a sign of human trafficking.

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement is made for Ronly Group Limited and its trading subsidiaries, Ronly Limited, Ronly Alloys Solutions and Ronly Agriculture, all of which are registered in England and Wales.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Ronly Group Limited slavery and human trafficking statement for the financial year ending 31 December 2018.

This statement was approved by the Board of Directors on 18 December 2018



Ashley Beale
Director