

Tata Steel UK Limited Modern Slavery Policy

1. Policy statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 Tata Steel UK Limited ("**TSUK**") has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all the company's business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in TSUK's own business or in any of its supply chains.
- 1.3 TSUK is also committed to ensuring there is transparency in the company's own business and in TSUK's approach to tackling modern slavery throughout its supply chains, consistent with TSUK's disclosure obligations under the Modern Slavery Act 2015.
- 1.4 TSUK expects the same high standards from all of its contractors, suppliers and other business partners and, as part of the company's contracting processes, includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expects that TSUK's suppliers will hold their own suppliers to the same high standards.

2. About this policy

- 2.1 The purpose of this policy is to:
 - (a) set out TSUK's responsibilities, and of those working for and on behalf of TSUK, in observing and upholding the company's position on modern slavery and human trafficking; and
 - (b) provide information to those working for and on behalf of the company on how to identify and report concerns regarding modern slavery and human trafficking.
- 2.2 This policy applies to all persons working for TSUK or on the company's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners ("**TSUK Personnel**").
- 2.3 This policy does not form part of any employee's contract of employment and TSUK may amend it at any time.

3. Responsibilities

- 3.1 The TSUK board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 The Director of Procurement, in respect of all, contractors, external consultants, third-party representatives and business partners ("**TSUK Supply Chain**") and the Chief HR Officer, in respect of all other TSUK Personnel, each has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.3 Senior Leaders for each TSUK site and each function are responsible for ensuring their teams are aware of, understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

4. Your responsibilities and how to raise a concern

- 4.1 You must ensure that you read, understand and comply with this policy.
- 4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for TSUK or under TSUK's control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3 You must notify the Director of Procurement or your main point of contact within TSUK (if within the TSUK Supply Chain), the Chief HR Officer (for any other TSUK Personnel), the Chief Legal Officer and/or the Head of Ethics & Compliance Management or use the confidential reporting system: integrity line as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.
- 4.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 4.5 If you believe or suspect that a breach of this policy has occurred or that it may occur you must notify Director of Procurement or your main point of contact within TSUK (if within the TSUK Supply Chain), the Chief HR Officer (for any other TSUK Personnel), the Chief Legal Officer and/or the Head of Ethics & Compliance Management or use the confidential reporting system: integrity line as soon as possible.
- 4.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or Director of Procurement or your main point of contact within TSUK (if within the TSUK Supply Chain), the Chief HR Officer (for any other TSUK Personnel), the Chief Legal Officer and/or the Head of Ethics & Compliance Management or use the confidential reporting system: integrity line.
- 4.7 As stated in TSUK's Confidential Reporting Policy, you can raise a genuine concern of wrongdoing under this policy without fear of victimisation, subsequent discrimination or disadvantage.

5. Training and communication

- 5.1 Training on this policy, and on the risk TSUK faces from modern slavery in its supply chains, will be given where needed.
- 5.2 TSUK's zero-tolerance approach to modern slavery in the company business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate on an ongoing basis.

6. Breaches of this policy

- 6.1 TSUK may terminate its relationship with other individuals and organisations working on TSUK's behalf (including any agent, contractors, external consultant, third-party representative or business partner) if they breach this policy.

7. **Contacts**

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