



MODERN SLAVERY STATEMENT

Financial Year Ended 30th April 2019

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (the 'Act') and sets out the actions that we have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Value Statement & Commitments

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, agents seconded workers, volunteers, agents, contractors and suppliers. We expect everyone to support and uphold the measures to safeguard against modern slavery.

We have a zero-tolerance approach to any form of modern slavery and human trafficking in our operations and supply chains. We have and will continue to be committed to being vigilant and proactive in ensuring that modern slavery is not taking place anywhere within our organisation or within our supply chains. We expect that our suppliers will hold their own trading partners to the same high standards.

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

Our Business & Risk Areas

Europa Import Export Ltd (and its holding company Eurocom Investments Ltd), registered in England and Wales, steel and commodity traders. We are 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.

Prevention Steps

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.

To ensure our supply chains and overall trade corresponds with our policies, our aim is to identify and assess these risks; mitigate these risks; monitor potential risk areas and protect whistle blowers.

We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.

Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

As part of our risk based approach we maintain 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 the suppliers business operations do not contradict our anti-slavery policy.

Training

Staff are informed to be aware 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.

Whistleblowing Policy

We operate a whistleblowing policy so that all employees know that they can raise any concerns about modern slavery associated with the Group or supply chain, without fear of reprisals.

Remedies

If we find that other individuals or organisations working on our behalf or in our supply chain have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

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.

This statement is made for Europa Import Export Limited, and its holding company Eurocom Investments Ltd, both which are registered in England and Wales.