



# MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

COUNTRYWIDE METALS LTD

May 2026

## 1 INTRODUCTION AND OUR COMMITMENT

Countrywide Metals Ltd is a UK metals recycling business. We collect, process and trade ferrous and non-ferrous scrap metals, returning them to manufacturers as secondary raw materials.

Our industry plays an important role in the circular economy, but we also recognise that the wider metals and recycling sector carries inherent human rights risks — particularly where labour is sourced through agencies, where supply chains cross international borders, and where visibility beyond direct counterparties is limited. We take these risks seriously and treat the prevention of modern slavery and human trafficking as a continuous responsibility, not a one-off declaration.

## 2 POLICIES, GOVERNANCE AND EXPECTATIONS

Countrywide Metals does not tolerate any form of slavery, servitude, forced or compulsory labour, child labour or human trafficking within our own operations or anywhere we have visibility in our supply chain. The standards expected of our colleagues, contractors, suppliers and customers are set out in our code of conducts and company policies. Together, these documents define how we behave, what we expect from those we do business with, and how concerns are raised and escalated.

### How we manage this internally:

- Day-to-day responsibility sits with the procurement and HR functions, with oversight from senior management.
- Policies are reviewed at least annually and updated whenever legislation, guidance or our risk profile changes.
- Awareness is reinforced through induction and ongoing colleague communications.

### What we expect from everyone we work with:

- Compliance with the Modern Slavery Act 2015 and equivalent local laws wherever they operate.
- Honest and verifiable recruitment practices, with no worker paying recruitment fees as a condition of employment.
- Willingness to engage with our due diligence processes and to remediate any issues identified.

## 3

## WHERE WE SEE RISK AND HOW WE RESPOND

Our annual risk review identified the following areas of our business as carrying the most material exposure to modern slavery and human trafficking. The list reflects sector-specific concerns flagged by industry guidance and our own operational experience:

- **Agency and temporary labour** — particularly where workers are recruited from overseas or through unfamiliar third-party providers.
- **Hauliers, drivers and logistics contractors** servicing our sites, where vulnerable workers may be subject to exploitative employment arrangements.
- **International scrap metal supply** from regions with documented prevalence of forced labour or weak labour-rights enforcement.
- **Contractors providing site services** such as cleaning, security and maintenance, where outsourcing can obscure underlying employment conditions.
- **Lower-tier suppliers** of consumables and equipment where direct visibility is limited.

The steps we take to identify, prevent and respond to these risks are described below. We measure progress year on year and aim to strengthen our approach with each reporting cycle.

- **Counterparty screening.** New suppliers, customers and agency providers are subject to compliance and due diligence checks before any business relationship begins, with the depth of those checks scaled to the assessed risk.
- **EcoVadis sustainability assessments.** We use the EcoVadis platform to evaluate ourselves and suppliers across labour and human rights, environment, ethics and sustainable procurement, and we work with suppliers to close out any corrective actions identified.
- **Contractual safeguards.** Our standard terms require compliance with the Modern Slavery Act 2015 and reserve the right to audit, suspend or terminate where breaches are found or suspected.
- **Targeted training.** Colleagues whose roles bring them into contact with suppliers, agency workers, or site visitors receive training on the indicators of modern slavery and the steps to take if something seems wrong.
- **Confidential reporting.** Concerns can be raised internally through line management or our Whistleblowing channel, or externally to the Modern Slavery & Exploitation Helpline on **08000 121 700**, with no risk of retaliation.
- **Continuous improvement.** We track measurable indicators including training completion rates, and the status of EcoVadis corrective actions to direct attention where it is most needed.

This statement has been published by Countrywide Metals Ltd in accordance with **section 54(1) of the Modern Slavery Act 2015** and sets out the actions we have taken during the financial year ending September 2025 to address modern slavery and human trafficking risks across our business and supply chain.

It will be made available on our website, shared with colleagues, and provided to suppliers and other stakeholders on request.

This statement was approved by the Board of Directors of Countrywide Metals Ltd in May 2026 and is signed below on behalf of the Board.

**Amy Bird**

Director

Countrywide Metals Ltd

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