



Introduction

Steel Formed Sections, one of Ireland and the UK's fastest growing suppliers of steel supports to internal linings and external cladding for apartment, commercial, institutional and other large buildings.

Our sections provide support to cladding, either set within the structural frame (using infill panels) or outside the main structural frame (using infill panels) or outside the main structural frame (using continuous framing). The sections are installed using self-tapping fixtures, allowing the external cladding to be fixed without delay which in turn facilitates internal work to begin. We can supply the sections ready to assemble on the project site.

Steel Formed Sections Ltd is absolutely committed to ensuring that there is no slavery or human trafficking in any part of our business, and to imposing the same high standards on our suppliers. Our people are expected to act ethically and with integrity always, and to raise concerns about our supply chain should any issues arise. Our management are expected to act resolutely to ensure compliance with this policy and to address the risk of slavery and human trafficking taking place within its own operations and supply chains.

SFS History & Business Overview

Steel Formed Sections was formed in November 2005 and is today Ireland's largest producer of internal liner and external cladding systems.

- Our company has gained essential expertise and product knowledge through close business relationships with customers, suppliers and research partners, including Cambridge Fire Research and Sound Research Laboratories.
- From our purpose-built 20,000 square feet production facility based in Lough Egish, Castleblayney, Co. Monaghan, we can give fast and reliable delivery and collection services with excellent access to all major road networks throughout Ireland and the UK.
- We can offer our customers sections ranging from 70-300mm ranging in gauge thickness from 0.5 to 3mm thanks to our investment in modern rolling technology in 2014.
- We like to work with the design team as early as possible in the design process so that our technical input can assist the team to find the most effective and economical solutions.

SFS Supply Chain

Our raw material supply chain can be complex, from Steel Furnace Mill to next Rolling Mill to next Galvanising Mill and to Steel Slitting Mill and then the Steel Stockholder. There can be up to 5 levels of suppliers between Steel Formed Sections and the source of raw materials that enter the manufacturing process. The breadth and depth of this industry make it challenging to effectively manage every aspect of the supply chain.

Supplier Code of Conduct

Steel Formed Sections is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Suppliers must demonstrate that there is no slavery or human trafficking in any part of their business. Steel Formed Sections works with suppliers to ensure that they meet the standards of this code of conduct. However, serious violations of Steel Formed Sections supplier code of conduct will lead to the termination of the business relationship this will show our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Due Diligence

As part of its efforts to monitor and reduce the risk of slavery and/or human trafficking occurring within its supply chains, Steel Formed Sections has adopted the following due diligence procedures when taking on new suppliers and reviewing its existing suppliers. Plus, as part of our initiative to identify and mitigate risk, various existing policies and practices will be reviewed and updated accordingly.

- Identify and assess the modern slavery and human trafficking risks of each new/existing supplier.
- We will be making compliance with the Modern Slavery Act 2015 a part of our negotiations, and contracts with our Tier 1 suppliers.
- Conduct supplier assessments, with more focus on slavery and human trafficking where general risks are identified.
- Review on a regular basis all aspects of the supply chain.
- Provide adequate protection for whistle-blowers.
- We will communicate to our Tier 1 suppliers the expected standards in addressing the risk of slavery and human trafficking in their supply chain.

Whistleblowing Policy

Steel Formed Sections encourages all its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of Steel Formed Sections. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Employee Code of Conduct

Steel Formed Sections code of conduct makes it clear to employees the actions and behaviour expected of them when representing the company either at home in Ireland or abroad in the UK. Plus, we will strive to maintain the highest standards of employee conduct and ethical behaviour at home and abroad in managing our supply chain.

In addition, Steel Formed Sections undertake “right to work” checks for all its employees prior to commencing employment. This will include checking, where applicable, that the employee has a valid work visa and is of an appropriate age to work.



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Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, Steel Formed Sections intends to provide access to training for all its employees. Through the training programs, employees will be encouraged to identify and report any potential breaches of the company's anti-slavery and human trafficking policy. In addition, we intend for the induction process of new employees to include an awareness of the risks of slavery and human trafficking within the business and its supply chains.

Further Steps

Steel Formed Sections is committed to reviewing the effectiveness of its policies and procedures about combatting slavery and human trafficking. Steel Formed Sections intends to explore how to measure and assess the management of the risks that are identified.

"This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Steel Formed Sections statement for the financial year ending 31st of December 2017."

Signed

Pat Burns
Managing Director

Date: 15/7/19