

Introduction

Almet Trading UK Ltd is committed to maintaining the highest standards of ethics, integrity, and responsibility in all aspects of our operations. As a UK-based steel trading company, we are dedicated to ensuring that our supply chain practices uphold these values, especially concerning the sourcing of steel. This policy outlines our commitment to ethical sourcing, including compliance with international sanctions and the maintenance of a responsible supply chain.

Scope

This policy applies to all employees, suppliers, contractors, and any other parties directly involved in the supply chain of Almet Trading UK Ltd.

Policy Statement

Almet Trading UK Ltd pledges to source steel products ethically, ensuring that no goods originate from countries subject to international sanctions, with a specific focus on avoiding the import of Russian-origin steel either directly or via third-country processing.

Compliance with Sanctions

- **Adherence to Sanctions Regulations:** Almet Trading UK Ltd strictly adheres to the sanctions set forth by the UK Government, including but not limited to the "Russia (Sanctions) (EU Exit) (Amendment) Regulations 2023." These regulations prohibit the import of certain Russian iron and steel products, including those processed in third countries, to prevent the circumvention of sanctions.
- **Prohibition Effective Date:** In line with the UK Government's guidance, the prohibition on the import of Russian iron and steel products processed in a third country took effect on 30th September 2023.

Supplier Management and Due Diligence

- **Approved Supplier List:** In accordance with our ISO 9001 quality management system, Almet Trading UK Ltd maintains an approved supplier list to ensure all our suppliers meet our ethical sourcing standards.
- **Supplier Contracts:** All suppliers are required to acknowledge and agree to our ethical sourcing standards through explicit clauses in our contracts, which prohibit the sourcing of sanctioned goods.
- **Supplier Declarations:** We mandate all suppliers to sign and declare compliance with the "Russia (Sanctions) (EU Exit) (Amendment) Regulations 2023," as part of our due diligence process to ensure transparency and accountability in our supply chain.



Ethical Sourcing Practices

- **Regular Audits and Assessments:** Almet Trading UK Ltd conducts regular audits and assessments of our supply chain to ensure ongoing compliance with this policy and to identify and address any potential ethical sourcing risks.
- **Training and Awareness:** We provide training and awareness programs for our employees and suppliers to ensure a clear understanding of our ethical sourcing policy, including the importance of compliance with international sanctions.
- **Reporting and Whistleblowing:** We encourage the reporting of any violations of this policy through our established whistleblowing channels. Almet Trading UK Ltd is committed to protecting those who report violations in good faith.

Review and Update

This policy will be regularly reviewed and updated as necessary to reflect changes in international sanctions, regulations, and our commitment to ethical sourcing practices.

Conclusion

Almet Trading UK Ltd is fully committed to ethical sourcing and to the compliance with international sanctions against the import of Russian steel products. We are dedicated to maintaining a responsible supply chain that aligns with our values of ethics, integrity, and responsibility.

Managing Director

December 2023

