

The Roe Group Ltd. Ethical / Responsible Sourcing Policy Statement

INTRODUCTION - THE ROE GROUP - ORGANISATION STRUCTURE

The Roe Group is a fabricator of reinforcing steel to the construction industry with its Head office based in Peterborough and six processing and distribution outlets in the UK.

The purpose of this policy is to demonstrate to our stakeholders that we will ensure integrity in all of our business transactions whilst observing purchasing practices that align with our corporate social responsibility aims and objectives.

This policy statement will be published on the Roe Group website as part of our communication to all of our stakeholders.

THE ROE GROUP – SUPPLY CHAINS

The Roe Group sources CARES approved stock materials, office supplies and support services from local and worldwide sources to be processed in the Group's fabrication outlets and delivered to site in accordance with our customers' requirements.

THE ROE GROUP POLICY ON ETHICAL AND RESPONSIBLE SOURCING. MODERN SLAVERY

The Roe Group is committed to ensuring so far as is reasonably practicable that there is no modern slavery or human trafficking in any part of our supply chain or operations. Our Modern Slavery Policy reflects our commitment to act ethically and with transparency and integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking part in any of our supply chains.

Business Integrity.

The Roe Group operates a strict code of conduct with regard to the acceptance of bribery or gifts made in the course of our business (Roe Group Anti-bribery and corruption policy.)

Environmental Impact.

The Roe Group will take into account wherever practicable the environmental performance and impact of goods and services when making purchasing decisions.

- We will seek to operate an EMS accredited management system in compliance with our stakeholders requirements.
- We will seek to reduce waste and optimise opportunities for the use of recycled or reclaimed materials.
- We expect our suppliers to manage their own impacts by having their own environmental strategy and operate with all applicable laws and regulations. People. The Roe Group are committed to H&S and by the implementing of robust policies and procedures and expect our suppliers and sub-contractors to share that commitment.
- We are committed to the promotion of ethical working conditions including fair wages, working hours and equal opportunities.
- We will respect the principles of human rights, to treat all employees with dignity and respect and to ensure that no child labour is employed.
- We will ensure that all employees receive the correct training to enable them to perform their duties in as safe manner as is reasonably practicable. THE ROE GROUP DUE DILIGENCE PROCESS FOR ETHICAL AND RESPONSIBLE SOURCING:- As part of our initiative to identify and mitigate risk.

The Roe Group Depots will –

- With regard to our national / international supply chains, our point of contact will preferably be a UK Company / Traders and we will expect these entities to have suitable ethical and responsible sourcing policies and processes in place in line with current legislation.
- Where possible we will ensure that staff / operatives are employed directly and should the need arise for agency workers that these agencies are fully aware of our policies and procedures.
- We will build long standing relationships with local suppliers and ensure that they are fully aware of our expectations of their business behaviour in line with current legislation.
- We have in place procedures to encourage the reporting of concerns and the protection of whistle-blowers. TRAINING. To ensure a high level of understanding of our ethical and responsible sourcing policies in our supply chains and business, we provide training to relevant members of staff. All Roe Group Directors have been briefed on the subject. THE MEASUREMENT OF OUR EFFECTIVENESS OF OUR ETHICAL AND RESPONSIBLE SOURCING POLICY. The Roe Group will use the following Key Performance Indicators (KPIs) to measure how effective we have been in ensuring the implementation of our ethical and responsible sourcing policy.

1. Communication through our established stakeholder engagement process to ensure our supply chain has a clear understanding of and compliance with our expectations.
2. The use of Labour monitoring and payroll systems in conjunction with the Groups Sustainability Policy.

3. The completion of annual audits by the Group Coordinator and Group Business Systems Advisor to provide evidence to the Board of Directors that we are complying with the Roe Groups ethical and responsible sourcing policies.

This policy applies to all those employed by The Roe Group Ltd.

Date 28th September 2016