

MODERN SLAVERY ACT 2015 POLICY (Statement)

Introduction

The Company was established in 1981 and in that time has developed from one small site into a comprehensive national supplier of steel reinforcement and associated products for use in the construction industry

The Roe Group, incorporating Roe Bros & Co Ltd and North West Steel Ltd are fully aware that Slavery and Human Trafficking remains as a hidden blight on our global society and that in our supply chain and operations we have to be alert to risks, however small, and act accordingly to any findings that are reported or discovered

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 the supply chain or operations. This 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

The Roe Group due diligence for slavery and human trafficking

As part of our initiative to identify and mitigate risk, the Roe Group will:

- Where possible we will ensure that staff / operatives are employed directly. However, should the need arise for agency workers, that the employment agencies have received a copy of our Policy and the agency workers themselves are fully aware of our modern slavery and human trafficking policy. All employees will receive a copy of this Policy within the Employee Handbook which also contains details of the Company Whistleblowing Policy for any employees who wish to raise any issues or concerns
- With regard to our supply chains, our point of contact will preferably be a UK Company / Trader and we will expect these entities to have suitable antislavery and human trafficking policies and processes in place in line with current legislation. We will hold annual reviews of our own Policy and request copies of our suppliers Policies where applicable. We have passed the accreditation of CIPS (Chartered Institute of Procurement & Supply, along with our CARES certification for Responsible Sourcing of Construction Products (Certificates available on request)
- Build relationships with suppliers and ensure that they are fully aware of our expectation of their business behaviour in line with current legislation. We remind suppliers of our expectations by having appropriate wording printed on our Purchase Orders regarding the Roe Group Policy

Suppliers' adherence to the roe group values

We have a zero tolerance policy to modern slavery and human trafficking and expect all those in our supply chain and contractors to comply with our values

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and business, relevant members of staff have received training from the Chartered Institute of Procurement and Supply

The measurement of our effectiveness in combating slavery and human trafficking

The Roe Group will use the following Key Performance Indicators (KPI's) to measure how effective we have been in ensuring that modern slavery and human trafficking is not taking part in any part of our business or supply chains:

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 relevant members of staff to provide evidence to the Board of Directors that we are in compliance with Section 54 of the Modern Slavery Act 2015

Policy Statement

This Policy Statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Roe Group's Modern Slavery and Human Trafficking Statement which has been approved by the Board of Directors for the last financial year ending 31st December 2025. The Roe Group consists of Roe Bros & Co Ltd (01564981) and North West Steel Ltd (2270027)

Signed by: *J Robertson*
J Robertson
Director
1st March
2026.

www.theroegroup.com