



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Macsteel International Trading Ltd

Financial Year ending 31 December 2024

This Modern Slavery and Human Trafficking Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It covers the activities of Macsteel International Trading Ltd (company registration number 15166463) ("**MIT**") for the period 1 January 2024 to 31 December 2024 (FY24).

MIT's board of directors has overall responsibility for approving MIT's annual modern slavery and human trafficking statement and ensuring that MIT complies with its obligations under the UK's Modern Slavery Act 2015.

MIT was incorporated as a company in the UK on 26 September 2023. Its registered office is 30 Gresham Street, London, United Kingdom, EC2V 7QP.

MIT's operations include:

- Sourcing of ferrous raw material products;
- Marketing and selling of ferrous raw material products;
- Logistics management;
- Distribution of ferrous raw material products;
- Quality management; and
- Claims handling.

MIT mainly operates out of its office in Dubai, United Arab Emirates. MIT leases its office space from its Dubai-based subsidiary. MIT is supplied local business support services, as required, by its subsidiaries and other group companies managed by MIT in Kenya, South Africa, China and India. MIT is also supplied business services by its direct parent company, Macsteel International Trading Holdings Limited (company number 14489006) ("**MITH**"). MITH is responsible for preparing its own modern slavery and human trafficking statement, therefore MITH's operations are not considered further within this statement.

As a newly incorporated company and a first-time publisher under section 54(1) of the Modern Slavery Act 2015, FY24 marked the start of MIT's journey toward identifying and mitigating risks of modern slavery and human trafficking in our operations and supply chains.

MIT's commodity and freight supplier contracts are generally spot-contracts, although there is a group of business partners which we contract with on a regular basis.

In FY24 we conducted a modern slavery and human trafficking risk assessment with respect to our own operations and some of our direct suppliers. In light of the variable and inconsistent nature of MIT's supply chain, the risk assessment was restricted to our top 20 steel suppliers and our top 20 freight providers by weight. The risk assessment considered several indicators to determine modern slavery and human trafficking risks including sector and industry, geographical location and specific entity risk. We relied on these indicators to identify our 'high-risk' suppliers.

During FY24 we started to develop a modern slavery and human trafficking policy which sets out our approach to supplier due diligence, and steps we intend to take to mitigate risks associated with 'high-risk' suppliers in particular. This policy is due to be finalised and implemented in FY25.

In FY25 we also plan to introduce modern slavery and human trafficking awareness training for all staff, with enhanced training for those staff who engage directly with 'high-risk' suppliers.

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With respect to our own operations, we did not identify any significant risks of modern slavery or human trafficking. We are satisfied that our internal policies and procedures appropriately mitigate any risks that may exist, including those risks that may be associated with our geographical locations.

We look forward to further developing our approach to modern slavery and human trafficking throughout FY25.

This statement was approved by the board of Macsteel International Trading Ltd on 30 May 2025