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# KME Steelworks Limited

## Responsible Sourcing of Raw Materials Policy

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### 1. Policy Statement

KME Steelworks Limited is committed to ensuring that the raw materials we source, including **steel, iron, aluminium, bauxite, manganese, stainless steel and associated components**, are obtained responsibly, ethically, and sustainably.

We recognise that the sourcing of metals and minerals can present social, environmental, and ethical risks, and we are committed to conducting our business in a way that supports sustainable supply chains, reduces environmental impact, and upholds human rights.

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### 2. Objectives

Our objectives are to:

- Source raw materials from suppliers who uphold **ethical, environmental, and human rights standards**.
  - Promote **sustainability and transparency** in our supply chains.
  - Reduce reliance on virgin materials by **maximising recycled content** in steel and aluminium.
  - Support **responsible mining initiatives** that minimise harm to people and the environment.
  - Ensure compliance with all relevant **UK and international legislation**.
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### 3. Scope

This policy applies to all raw materials used in KME Steelworks Limited's operations, including but not limited to:

- Steel and stainless steel
  - Iron and iron ore
  - Aluminium and bauxite
  - Manganese
  - Ancillary raw materials, alloys, and components
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## 4. Commitments

### 4.1 Ethical Sourcing

- Work only with suppliers who adhere to recognised labour standards, including the prohibition of child labour, forced labour, and exploitation.
- Require suppliers to comply with the **Modern Slavery Act 2015** and respect human rights across their operations and supply chains.

### 4.2 Environmental Protection

- Prioritise suppliers who minimise environmental impacts through sustainable mining, energy efficiency, and water management practices.
- Encourage the use of **green steel** and other **low-carbon technologies**.
- Require suppliers to demonstrate compliance with environmental laws, including waste and emissions regulations.

### 4.3 Supply Chain Transparency

- Conduct risk assessments on suppliers and materials to ensure compliance with responsible sourcing standards.
- Request supplier disclosure of material origins, especially for higher-risk raw materials such as bauxite and manganese.
- Where relevant, support the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals**.

### 4.4 Recycling and Circular Economy

- Increase the use of **recycled metals** in production to reduce demand for virgin raw materials.
- Partner with suppliers and customers to promote closed-loop recycling of steel and aluminium products.

### 4.5 Continuous Improvement

- Regularly review and update sourcing practices to reflect changes in legislation, industry best practice, and stakeholder expectations.
  - Provide training to employees and procurement teams on responsible sourcing principles.
  - Engage with industry initiatives that support **sustainable mining and ethical supply chains**.
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## 5. Roles and Responsibilities

- **Procurement Team** – Ensure that all raw material suppliers meet the company’s responsible sourcing standards.
  - **Sustainability & Compliance Manager** – Monitor supplier compliance, conduct audits, and manage reporting.
  - **Executive Management** – Approve sourcing strategies and provide resources to achieve policy commitments.
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## 6. Compliance and Review

- This policy supports compliance with **UK health, safety, environmental, and modern slavery legislation**.
  - Compliance will be monitored through supplier audits, questionnaires, and performance reviews.
  - The policy will be **reviewed annually** to ensure effectiveness, transparency, and alignment with international best practices.
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## 7. Policy Commitment

KME Steelworks Limited is committed to building a resilient and ethical supply chain that supports sustainable development, reduces environmental impact, and respects human rights.

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Sustainability Manager:



Date: 12 September 2025

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