



Kurt Orban Partners UK Ltd (KOPUK Ltd)

February 2019

Modern Day Slavery Statement for Financial Year Ended 31 December 2018 - Issued Pursuant to Section 54 of the Modern Slavery Act 2015

Policy

KOPUK is committed to conducting all aspects of its business in an ethical and transparent manner. We acknowledge our responsibilities and duties under the Act.

Our values require that all our employees are treated with dignity and respect and that we are fundamentally opposed to all forms of Slavery, Human Trafficking and Forced Labour

We require that our supply chain do not engage in any of these practices and confirm that should such breach occur all business relations will be terminated immediately

Structure and Supply Chains

KOPUK are a Steel Trading company based and operating in the UK - We have 15no operational staff, sourcing steel products mainly from Europe and Asia. We procure product from Steel Mills overseas, arrange for shipment to the UK and then sell to our Customer base

We only purchase from ISO 9000 quality approved mills that are approved by our International trade organisation.

Our Policies

We have the following Policies

- Anti Slavery ant Human Rights Trafficking Policy
- Environmental Policy
- Health and Safety Policy
- Quality Assurance Policy
- Human Rights Policy
- Employee Code of Conduct
- Supplier Code of Conduct

Due Diligence Process

KOPUK continually review all aspects of its supply chain for Quality, Performance and Geographical risk. We or our Agents visit most our suppliers at least once a year to review their production methods and review their working and employment practices.

We understand that Slavery and Human Rights Trafficking does exist in the world today, therefore we only deal with larger internationally approved Suppliers that have the approval of International Trade bodies.

Risk Assessments

These are carried out in line with our Quality Management System on all aspects of our business.

With regards Modern Day Slavery we review our supply chain constantly, as we would not employ any company that we considered to be potentially exploiting individuals in this way.

We have a Modern Day Slavery Policy that we impose upon our supply chain to ensure that this practice does not exist within our business

We continually assess the risks to other parts of our business, particularly as we trade in a Global Market that is subject to rapid policy change by Government Policy, Natural Disasters and Currency Fluctuations.

Measuring and Effectiveness.

In recognising our obligations under the Act we have implemented the following procedures

- Conducted risk assessments to determine which parts of our business may be most at risk
- Engaged with our Supply Chain to make them aware of our Policy on this matter
- Undertake Due Diligence with particular emphasis on this Act for all existing and potential new suppliers

In doing so, we will be able measure the effectiveness of this action and monitor it going forward.

Staff Training.

Ethics is a cornerstone of our business, all staff are made aware of this when they join the company and at their annual review. Training in all aspects of the company's business which includes Protecting Human Rights is given to all staff to promote awareness and personal development.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking for the financial year ended 31st December 2018



Nick Lally

Managing Director