

## **PRIMETALS TECHNOLOGIES LIMITED**

### **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This Modern Slavery and Human Trafficking statement is given by Primetals Technologies Limited for the financial year ending 31 March 2023 pursuant to section 54 of the Modern Slavery Act 2015. This statement has been approved by the board of directors of Primetals Technologies Limited and is given on behalf of Primetals Technologies Limited and its subsidiary companies in the Primetals Technologies Group (Primetals Technologies).

#### **OUR BUSINESS, STRUCTURES AND SUPPLY CHAINS**

Primetals Technologies is headquartered in London, United Kingdom and is a worldwide engineering, plant-building, and lifecycle partner for the metals industry. Primetals Technologies offers a complete technology, product and service portfolio that includes integrated electric, automation, and environmental solutions. This covers every step of the iron and steel production chain that extends from the raw materials to the finished product – in addition to the latest rolling solutions for the nonferrous metals sector.

Primetals Technologies is part of the Mitsubishi Heavy Industries (MHI) group of companies. Primetals Technologies has around 7,000 employees worldwide. Further details can be found on <https://www.primetals.com/>

Primetals Technologies purchases goods and services from suppliers located throughout the world in support of the group's commercial activities. Primetals Technologies has 62 locations (each covering one or more of the following activities: design, manufacturing, sales and after service) distributed across 23 countries and sources goods and services from over 50 countries. Primetals Technologies has dedicated Supply Chain Management (SCM) organizations in nine countries (UK, Austria, Germany, India, China, Japan, USA, Mexico, and Brazil).

#### **REGISTRATION ON THE UK GOVERNMENT MODERN SLAVERY STATEMENT REGISTRY**

To demonstrate our support in the fight against Modern Slavery worldwide and to show the positive steps which are established within Primetals Technologies to prevent and detect signs of Modern Slavery, Primetals Technologies has registered on the voluntary UK Government Modern Slavery statement registry.

#### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Primetals Technologies is committed to taking effective steps to assess, prevent and mitigate the risk of Modern Slavery in our operations and supply chains.

Primetals Technologies has issued a Modern Slavery Act Policy which confirms that the prevention, detection and reporting of Modern Slavery in any part of Primetals Technologies' business or supply chains is the responsibility of all those working for Primetals Technologies or under its control.

Employees are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of Primetals Technologies' business or supply chains at the earliest possible stage via their local

manager, their local compliance manager or via Primetals Technologies' confidential whistleblower hotline "Speak Up".

It is enshrined in the policy that no one will suffer any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery of whatever form is or may be taking place in any part of Primetals Technologies' business or in any of its supply chains.

Each employee of Primetals Technologies is informed about the policy and is therefore aware of Modern Slavery issues.

## **MHI GROUP GLOBAL CODE OF CONDUCT**

Due to MHI being the ultimate parent company of Primetals Technologies, all Primetals Technologies employees must adhere to the MHI Group Global Code of Conduct (MHI Code) to uphold MHI's reputation as a company of high integrity and ethics.

Please find the MHI Code under the following link

[https://www.mhi.com/company/aboutmhi/policy/pdf/codeofconduct\\_en.pdf](https://www.mhi.com/company/aboutmhi/policy/pdf/codeofconduct_en.pdf)

Within the MHI Code it is clearly stated under chapter "Occupational environment and human rights" that MHI will ensure that it:

- does not use compulsory or forced labor in any of its operations; and
- does not use child labor in any of its operations.

Furthermore, it is mentioned that MHI will not tolerate:

- sexual harassment;
- any other kind of harassment, whether direct or indirect, physical, or psychological, verbal, or non-verbal; and
- any other action or activity that creates a hostile working environment for its employees.

## **PRIMETALS TECHNOLOGIES' SUPPLIER CODE OF CONDUCT**

Primetals Technologies aims to be transparent about the steps it takes to assess, prevent, and mitigate the risk of Modern Slavery in our operations and supply chains, and we expect the same of our contractors, suppliers, and other business partners. Our contracting processes, therefore, require that suppliers and other business partners comply with Primetals Technologies' Code of Conduct for Suppliers and Third-Party Intermediaries (Code of Conduct).

The Code of Conduct can be found at

[https://www.primetals.com/fileadmin/user\\_upload/content/03\\_about-us/SCM/HQ-002-11.pdf](https://www.primetals.com/fileadmin/user_upload/content/03_about-us/SCM/HQ-002-11.pdf).

The Code of Conduct defines the basic requirements placed on suppliers of goods and services concerning their responsibilities towards their stakeholders and the environment (corporate social responsibility) and includes prohibitions on various behaviours and employment practices.

In respect of Modern Slavery and Human Trafficking, the Code of Conduct specifically requires that suppliers and other business partners:

- ensure that there is no Modern Slavery or Human Trafficking in their businesses and supply chains; and

- have in place an appropriate anti-slavery policy which similarly reflects the commitment to acting ethically and with integrity in all business relationships.

The Code of Conduct also specifically requires that suppliers and other business partners must use reasonable efforts to promote compliance with the Code of Conduct amongst their suppliers.

## **DUE DILIGENCE PROCESSES**

Given the fact that the highest Modern Slavery risk for Primetals Technologies exists in the supply chains, Primetals Technologies sets out several Due Diligence steps which SCM should follow to seek to mitigate this risk.

The following Due Diligence processes are in place:

- Risk assessment of suppliers:  
Primetals Technologies distinguishes between normal and high-risk suppliers which are located in a country which has an estimated proportion of the population in Modern Slavery of 0.5% or more in accordance with the Global Slavery Index. <https://www.globalslaveryindex.org/>
- Compulsory actions for New Supplier Registration:  
There is for instance a requirement for the potential supplier to fill out an Assessment Template including questions regarding Modern Slavery.
- Identification of High-Risk Suppliers and sharing the results with all local SCM employees.
- Monitoring for Existing Suppliers:  
Regardless whether the supplier is considered a High-Risk Supplier or not, all SCM members keep watch for any suspicions of Modern Slavery through their daily activity e.g. discussion or document survey.
- Supplier site visit:  
During all visits to supplier's premises - independently whether that supplier is considered a High-Risk Supplier or not - all Primetals Technologies' representatives are aware of and are on the lookout for signs that workers may be victims of slavery, servitude, or exploitation. In case there is evidence of Modern Slavery indicators Primetals Technologies employees ask the suppliers special (predetermined) questions to better assess the situation.

In any case of suspicion:

- additional clarification, meeting or supplier site visit must be done;
- where SCM is unsure as to whether a supplier should be engaged or not, further guidance is sought from Compliance colleagues; and
- all clarifications and decisions must be recorded and stored.

As part of an internal questionnaire, all Primetals Technologies entities and Primetals Technologies controlled affiliates confirmed that up to 31 March 2023, there was no warning sign of Modern Slavery in any parts of Primetals Technologies' business and supply chain.

## **TRAINING**

To ensure that our staff understand and can identify Modern Slavery and Human Trafficking risks in our supply chains and business, we continue to develop and provide appropriate training.

In the financial year 2022

- all the employees who are directly dealing with suppliers in their daily business were trained in a Primetals Technologies internal training;
- a risk based selected group of employees completed – in addition to the Primetals Technologies internal training - a Modern Slavery web-based training; and

- an SCM training course for project managers (which includes the topic of Modern Slavery and Human Trafficking) is given on a regular basis, and attending this course is one of the essential requirements before being certified as a Senior project manager within Primetals Technologies.

#### **OUR EFFECTIVENESS IN ELIMINATING SLAVERY AND HUMAN TRAFFICKING**

During financial year 2023, Primetals Technologies will continue to review the effectiveness of the measures it takes to assess, prevent, and mitigate Modern Slavery or Human Trafficking in our business and supply chains, and we will use this for a better development of our procedures and best practices.



Satoru Iijima

Chief Executive Officer  
Primetals Technologies Limited