



## PRIMETALS TECHNOLOGIES LIMITED

### MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This modern slavery and human trafficking statement is given by Primetals Technologies Limited (PTL) for the financial year ending 31 March 2019 pursuant to section 54 of the Modern Slavery Act 2015. This statement has been approved by the board of directors of PTL and is given on behalf of PTL and its subsidiary companies in the Primetals Group (Primetals).

#### OUR BUSINESS, STRUCTURES AND SUPPLY CHAINS

Primetals is headquartered in London, United Kingdom and is a worldwide engineering, plant-building and lifecycle partner for the metals industry. Primetals 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 is a joint venture of Mitsubishi Heavy Industries, Ltd. (MHI) and Siemens AG. Mitsubishi-Hitachi Metals Machinery, Inc. - an MHI consolidated group company with equity participation by Hitachi, Ltd. and IHI Corporation - holds a 51% stake and Siemens AG holds a 49% stake in PTL. Primetals has around 7,000 employees worldwide.

Further details can be found on <http://www.primetals.com/en/Pages/Home.aspx>

Primetals purchases goods and services from suppliers located throughout the world in support of the group's commercial activities.

#### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

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

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

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of Primetals' business or supply chains at the earliest possible stage via their local manager, their local compliance manager or via Primetals' 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' business or in any of its supply chains.

#### PRIMETALS' SUPPLIER CODE OF CONDUCT

Primetals 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' Code of Conduct for Suppliers and Third Party Intermediaries (Code of Conduct).

The Code of Conduct can be found at <http://www.primetals.com/en/about-us/globalscm/Pages/globalscm.aspx>

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**

In order to seek to ensure compliance with the Code of Conduct and identify and respond to modern slavery and human trafficking risks, Primetals has in place processes to:

- identify and assess areas of particular risk in its supply chain;
- request information from existing and potential suppliers aimed at detecting the employment practices; and
- ensure that when visits are made to suppliers, Primetals' personnel look for any signs that suspect employment practices may be taking place and ask questions of suppliers aimed at detecting any such practices.

#### **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.

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

During financial year 2019, Primetals 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 to inform the development of our procedures and best practices.



Satoru Iijima

Chief Executive Officer  
Primetals Technologies Limited