



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 2018 pursuant to section 54 of the UK Modern Slavery Act 2015. This statement has been approved by the board of directors of Primetals and is given on behalf of Primetals and its subsidiary companies in the Primetals' Group ("Primetals").

Primetals' Business

Primetals is headquartered in London, United Kingdom and is a worldwide leading 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 (MHI) and Siemens. Mitsubishi-Hitachi Metals Machinery (MHMM) - an MHI consolidated group company with equity participation by Hitachi, Ltd. and IHI Corporation - holds a 51% stake and Siemens a 49% stake in the company. Primetals employs around 7,000 employees worldwide.

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

Primetals' Policy on Slavery and Human Trafficking

Primetals has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its 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 expects the highest standards from all of its contractors, suppliers and other business partners and, as part of its contracting processes, requires that suppliers comply with Primetals' Code of Conduct for Suppliers and Third Party Intermediaries.



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 which Primetals will not tolerate.

In respect of modern slavery and human trafficking, Primetals has updated the Code of Conduct so that this now specifically requires that suppliers and other business partners:

- ensure that there is no modern slavery or human trafficking in the supply chains or in any part of its supplier's business; 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 mitigate 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 employment practices which Primetals will not tolerate, including modern slavery and human trafficking; and
- ensure that when visits are made to suppliers, Primetals' personnel look for any signs that such employment practices may be taking place and ask questions of suppliers aimed at detecting any such practices.

Primetals' Ongoing Commitment to Eliminating Slavery and Human Trafficking

Guidance has been given to supply chain management teams by Legal and Compliance on the Modern Slavery Act and on how best to implement and develop the above processes and ensure compliance with the Code of Conduct. Further guidance will be given and discussions will take place as Primetals continues to review the processes which it has in place.

Primetals is committed to best practices and will develop its processes and implement new processes as needed so as to seek to prevent any modern slavery and human trafficking practices within Primetals' business and its supply chains.

During financial year 2018, we will continue to review our effectiveness of the measures we take in ensuring that there is no modern slavery or human trafficking in either our business or our supply chains, and we will use this to inform the development of our procedures and best practices.

A handwritten signature in black ink, appearing to read "Satoru Iijima".

Satoru Iijima

Chief Executive Officer

A handwritten signature in blue ink, appearing to read "Peter Schraut".

Peter Schraut

Chief Financial Officer