

TW Metals Limited and Locate Supplies Limited Modern Slavery Policy Group Statement 2019

TW Metals Limited stands for integrity, respect for the individual, commitment, customer satisfaction and continuous improvement.

The scope of the business includes procurement, inventory and service provision management for in-house cutting, finishing and distribution of metallic and non-metallic raw materials including ferrous and non-ferrous alloy tubes, pipes, flanges & fittings, bar, sheet, plate, extrusions, forgings, shims, castings, wire, strip and coil. Management of subcontracted cutting, heat treatment, finishing and test inspection activities and ancillary and associated activities as appropriate.

TW Metals Limited recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The statement also covers Locate Supplies Limited. TW Metals Limited purchase Locate Supplies in June 2018.

1) Structure and Supply Chains

TW Metals Limited operates throughout Europe.

Our supply chains include providers of products and services to TW Metals Limited and Locate Supplies. We believe that suppliers and other business partners share in the benefits of a collaborative relationship. We work together to minimise and manage business risk using shared metrics and industry best practice.

2) Policies

The aim of the policy and statement is the prevention of opportunities for modern slavery to occur within our business or supply chain.

This policy's use of the term "modern slavery" has the meaning given in the Modern Slavery Act 2015

The policy governs our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf. We expect all who have, or seek to have, a business relationship with TW Metals Limited and Locate Supplies Ltd, to familiarise themselves with our anti-slavery policy and to act at all times in a responsible way.

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

As a business, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

As part of our commitment to combating modern slavery, we have the following policies within our organisation/group:

Code of Conduct - Our Code of Conduct sets out what we expect from every single person working for and with TW Metals Limited and Locate Supplies Ltd. It also underlines our responsibilities to our people, partners and shareholders.

Anti-Bribery - sets out the responsibilities of TW Metals Limited and Locate Supplies Ltd and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption

Conflict materials - TW Metals' Conflict Minerals statement addresses our aspiration to ensure that in line with the Dodd Frank Act Section 1502, the products we procure and sell either:

- Do not contain Conflict Minerals (defined as Tin, Tantalum, Tungsten or Gold)
- If Conflict Minerals are utilised, they did not originate in the DRC or adjoining Countries, or
- The Conflict Minerals were the result of a recycled or scrap source

Whistleblowing - details are available to all employees via noticeboards and through the Intranet. This holds details of an independent hotline where employees can raise any concerns.

3) Due Diligence

We undertake due diligence when considering taking on new suppliers/contractors through the use of the Dow Jones Risk Centre.

We expect our new suppliers and contractors to confirm that they also operate a zero-tolerance approach to exploitation and actively request that all our new suppliers/contractors comply to the requirements of the Modern Slavery Act 2015. If we become aware of any breaches, then we will make it clear to our suppliers and contractors that we will terminate contractual terms as a result of the breach.

4) Risk Assessment

TW Metals Limited and locate Supplies Ltd assesses its supply chain (new and existing) by checking its suppliers online via its subscription to the Dow Jones Risk Centre.

5) Measuring effectiveness

All suppliers and contractors are evaluated and are required to complete a questionnaire, this information is assessed and all approved suppliers and contractors are added to a bespoke Vendor Watch system. We can only do business with suppliers and contractors on this list.

6) Training

In order to ensure our staff have an awareness of modern slavery issues we ensure that the Policy Statement is available to all employees and suppliers via the internet and intranet. We also ensure that government material in the form of posters are visible throughout our sites. All new employees (through the induction process) are made aware of the policies and procedures and the importance of adhering to them.

Policy Statement

TW Metals Limited and Locate Supplies Limited understands the potential modern slavery risks related to its business and puts in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

TW Metals Limited and Locate Supplies recognises that it has a responsibility to the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

TW Metals Limited and Locate Supplies Ltd will not support or deal with a business knowingly involved in slavery or human trafficking.

The Directors of the Business will take responsibility for the Modern Slavery policy and ensure that employees are aware of the importance of ensuring that slavery and human trafficking is not taking place within its supply chains or customer base.

This statement relates to actions and activities during the financial year ending 31st December 2018 for both TW Metals Ltd and Locate Supplies Ltd. (1st January 2018 – 31st December 2018)

This statement and policy has been approved by the organisation's VP & MD Europe, who will review and update it annually.

VP & MD Europe signature:

A handwritten signature in black ink, appearing to be 'Gail Thomas'.

VP & MD Europe name:

GAIL THOMAS

Date: 5/4/19