



TW Metals Modern Slavery Policy

Introduction

The aim of the policy 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 UK, to familiarise themselves with our anti-slavery value and to act at all times in a way which is consistent with our anti-slavery value.

Purpose of the Policy

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 (also refer to Code of Conduct Policy) 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.

Suppliers/Contractors

We undertake due diligence when considering taking on new suppliers/contractors.

We expect our new suppliers and contractors to confirm that they also operate a zero tolerance approach to exploitation and ask that all our new suppliers/contractors abide by 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.

Conflict Materials

TW Metals Conflict Minerals Statement addresses our aspiration to ensure a conflict free supply chain.

Whistleblowing

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

Policy Statement

TW Metals UK 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 UK 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 UK will not support or deal with a business knowingly involved in slavery or human trafficking.

The Directors of the Business will take responsibility 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 has been approved by the organisation's VP & MD Europe, who will review and update it annually.

VP & MD Europe signature:

VP & MD Europe name:

A handwritten signature in blue ink, appearing to be 'Gail Thomas', written over a horizontal line.

GAIL THOMAS

Date: 2. Jan. 2018