

## **Minmetals (U.K) Ltd**

### **Modern Slavery Act Statement**

#### **Introduction**

We are proud of the steps we have taken to combat slavery and human trafficking. We have implemented the Minmetals Anti-Slavery Policy (the “Policy”) which is designed to ensure that we strictly prohibit the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

It is a priority within the group to ensure that the people we deal with (in particular suppliers and our representatives) share this responsibility and reflect our values to prevent slavery, servitude and forced or compulsory labour.

#### **Organisation's structure**

Our immediate parent company is China Minmetals H.K. (Holdings) Ltd., which is located in the Hong Kong. Minmetals (U.K) Ltd is part of a group ultimately owned by the State-Owned Assets Supervision and Administration Commission of the State Council and the State-Owned Assets Supervision and Administration Commission of Hunan Provincial People's Government, both of which are located in China.

The other companies in the group are:

- Album Enterprises Ltd
- Top Create Resources Ltd
- China Minmetals Nonferrous Metals Co., Ltd
- China Minmetals Nonferrous Metals Holding Co., Ltd
- China Minmetals Corporation Ltd
- China National Metal Products Co. Ltd
- China Minmetals Corporation
- China Reform Holdings Corporation Ltd

The whole group has over 200,000 employees, and is involved in metal ore mining, trading in metal products, metallurgical engineering services, financial services and real estate.

## **Our supply chains**

Our main suppliers are KGHM Polska Miedz S.A. for copper cathodes, and MMG South America Co. Ltd for copper concentrate. Both organisations take their Corporate Social Responsibility and Compliance responsibilities seriously, as you can see here:

- <https://kghm.com/en/sustainable-development/trustworthy-investment/respect-index>
- <http://www.mmg.com/en/Sustainability-and-Community/ESG-Governance-and-Compliance.aspx>

## **Our policies on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

## **Supplier adherence to our values and ethics**

We have zero tolerance for slavery and human trafficking. Our suppliers are required to hold their own suppliers to the same high standards.

We consider the high-risk sectors of our business to be mining activities in jurisdictions without equivalent anti-slavery legislation.

As part of our ongoing risk assessment and due diligence processes, we consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Policy.

We also assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts

with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Policy, which sets out the minimum standards required to combat modern slavery and trafficking.

If we find that other individuals or organisations working on our behalf have breached our Policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remedied and whether that might represent the best outcome for those individuals impacted by the breach, to terminating such relationships.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2018. It was approved by the board of directors on 25 March 2019.

Jin Wang  
Managing Director  
Minmetals (U.K) Ltd  
25 March 2019