



TMT Metals (UK) Ltd  
1 Cornhill, London,  
United Kingdom, EC3V 3ND  
Tel: +44 203 709 7777

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TMT METALS (UK) LIMITED – MODERN SLAVERY STATEMENT FOR THE FINANCIAL  
YEAR 2017-2018

## **INTRODUCTION**

This statement is made on behalf of TMT METALS (UK) LIMITED located at 1 Cornhill, London EC3V 3ND, pursuant to the section 54(1) of the Modern Slavery Act 2015 and comprises TMT METALS (UK) LIMITED's Modern Slavery Statement.

## **OUR BUSINESS**

Our Company is engaged in trading of nonferrous metals, ferroalloys, nickel and copper. We source from producers and supply nonferrous metals to customers in Europe primarily. We also operate from our office situated in Switzerland. We are a member of the International Tin Supply Chain Initiative and adhere to the principles of conflict free trading as set forth by the OECD and United Nations.

## **OUR SUPPLY CHAINS**

Our supply chains include: sourcing nonferrous metals from trading companies and marketing to customers. Our counterparts are primarily located in EU and ASEAN region primarily.

## **OUR EMPLOYEES**

All our employees are required by Management to read and understand our Code of Conduct along with the internal policies. All employees sign off on the Code of Conduct which outlines and directs employees to be in compliance with local laws at all times. Our internal policies include human rights code, which does not tolerate abuse of human rights within any part of our business or supply chains and will take appropriate steps against any complaints received in this regard. These instructions apply to all employees across all jurisdictions. In addition, in our Whistleblowing Policy we also guide employees how to raise potential issues to our Compliance and Risk department.

## **OUR POLICIES ON SLAVERY**

TMT Metals (UK) Ltd is fully committed to ensuring that there is no modern slavery or its equivalent or in any part of our business. Our commitment to behaving ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls tries to mitigate any form of unethical or illegal behaviour including modern slavery.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner, which include:

**Equal Opportunities:** We are fully committed to ensuring that equal opportunities policies are implemented and maintained. All terms and conditions of service apply on a fair and consistent basis to every member of staff.

**Recruitment Policy.** We operate a robust recruitment policy, including conducting checks on work eligibility for all employees to safeguard against human trafficking or individuals being forced to work against their will.

**Code of Conduct.** This code explains the manner in which we behave as an organisation and how we expect our employees to act.



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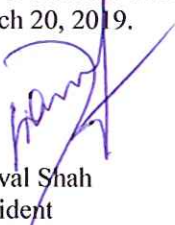
## **DUE DILIGENCE PROCESSES FOR MODERN SLAVERY**

Each employee is encouraged to raise illegal or inappropriate employment practice. The segregation of responsibilities and available back up resources provide additional resources internally to all employees. We closely monitor potential risk areas as we have a flat reporting structure. We protect Whistle-blowers who can report to those outside their own reporting lines to our internal and independent Risk Department.

## **FOLLOW UP**

All our staff is required to read and sign off on each policy. Each employee is encouraged to contact their line managers, and if they feel they cannot, the internal independent Risk department to raise potential unethical behaviours which includes Modern Slavery Act 2015.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes TMT Metals (UK) Limited's slavery and human trafficking statement for the financial year ending 31st December 2018 and was approved by the Board of Directors of TMT Metals (UK) Limited on March 20, 2019.



Dhaval Shah  
President

For and on behalf of TMT Metals (UK) Limited

Date: 25/03/2019