



TMT Metals Holdings Limited
1 Cornhill
London, England, EC3V 3ND
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MODERN SLAVERY STATEMENT FOR TMT METALS HOLDINGS LIMITED AND ALL ITS SUBSIDIARIES FOR THE FINANCIAL YEAR ENDED MARCH 31, 2019

Introduction from Dhaval Shah, President, TMT Metals Holdings Limited.

We are committed to improving our practices to combat slavery and human trafficking.

We do not operate in conflict zones. None of business lines nor areas of work entail sanctioned and non-transparent businesses. We only engage with counterparties that are transparent and which we have performed Due Diligence on. Our Due Diligence network and feedback ensure we are committed to no slavery or human trafficking. If such situations do arise, we will take immediate steps to notify authorities and cease all activities.

Organisation's structure

TMT Metals Holding Limited (TMT) is a UK based group engaged in trading of non-ferrous metals, minor metals and ferroalloys and trading of ferrous metals scrap. Founded in 2010, the group was initially focused on the trading of Tin, Aluminium and Minor Metals. We at present have operations in UK, Switzerland and soon to be started in Cyprus. TMT Metals Holdings Limited is the parent company of TMT Metals UK Ltd, TMT Metals AG and TMT Metals (Cyprus) Ltd. The Group has a global annual turnover of approximately USD 1.2 billion.

Our business

TMT Metals operates from two entities, **TMT Metals AG**, the flagship company focusing on the legacy business of tin, aluminium lead, zinc and minor metals and **TMT Metals (UK) Ltd**, the newer company focusing on developing new markets including Copper, Nickel and ferrous metals. Both entities are consolidated through **TMT Metals Holdings Limited, UK**. As of June 2019, TMT Metals has incorporated a new subsidiary in Cyprus in the form of **TMT Metals (Cyprus) Ltd**.

Our supply chains

Our supply chains are combination of Publically traded companies and privately held firms. We source base metals from smelters and traders and sell to end users and traders primarily in Asia, North America and EU region.

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 practices reflect 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.



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Our Due Diligence process is thorough and we only trade and source from companies that pass our process. We also partner with Global firms who provide additional KYC information. A member of our team visits each of trading partners to understand the approach and values and social standards of the counterpart.

We look into this holistically like having stringent policies also on Competition and Money Laundering. We believe that in today's corporate world, we can't be too cautious.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate any potential risks, we perform a full KYC and AML check as part of on boarding. We always try to visit our clients and their areas of operation to get first-hand knowledge. We use industry leaders on Compliance and Due Diligence documentation.

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 whistle blowers.

Supplier adherence to our values [and ethics]

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our ethics we have in place a supply chain compliance programme.

[We have a dedicated compliance team, which consists of representatives from the following departments:

- [Legal Raji Radhakrishnan]
- [Audit and compliance Pooja Nagalla]
- [Human resources Dhaval Shah]
- [Procurement Shivkumar Pasi/David Gaddes/Dhaval Shah]
- [Sales Sreyashi Kar/David Gaddes/Dhaval Shah]

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.



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Our effectiveness in combating slavery and human trafficking

[We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

We seek to prevent by raising awareness both internally and by due diligence means for external clients.

We would cooperate and with local and international law enforcement to persecute offenders.

[Further steps]

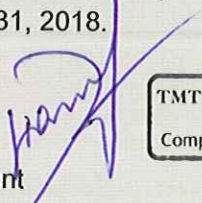
Following a review of the effectiveness of the steps we have taken in 2019 to ensure that here is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

Introduce Anti-Slavery and Anti Human Trafficking questionnaire into our KYC documentation list

Retraining employees at regular intervals on Anti-Slavery and Anti Human trafficking standards in the future.

This statement will be reviewed annually and a copy of the same would be shared to stakeholders.

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 March 31, 2018.


President

TMT METALS HOLDINGS
LIMITED
Company Number: 09566156

TMT Metals Holdings Limited.

Date: 22/08/2019