

Statement on behalf of Harsco Metals Group Limited:

This statement sets out our actions to ensure that slavery and human trafficking are not taking place in any of its businesses or supply chains in compliance with section 54(1) of the UK Modern Slavery Act of 2015. This statement covers the financial year ending 31 December 2018.

We are a subsidiary company of Harsco Corporation, a worldwide industrial and environmental services and products company. Harsco Corporation was incorporated in the state of Delaware, USA and is based in Camp Hill, Pennsylvania, USA. Our ultimate United Kingdom based parent is Harsco Investment Limited which acts as an intermediate holding and finance company to the business units operating within the United Kingdom.

Our core activity is the provision of mill services throughout the entire metals production process of the steel industry within the United Kingdom along with management services. Further activities are the processing of steel slag and the sale of resulting road surfacing aggregates.

We seek to uphold human rights in all our operations and facilities in the United Kingdom and globally. We do not condone or permit the use of modern slavery, human trafficking, or child, forced, indentured or involuntary labour in any of our operations. We promote the health and safety of all our workers in every location. In addition, we ensure compliance with fair wage and hour laws in all of our operations. We will not knowingly conduct business with – and will terminate business dealings with – any supplier or other business partner who violates these standards.

In furtherance thereof, there is:

1. An acknowledgement of Human Rights, including the prohibition of slavery and human trafficking, in both the Harsco Code of Conduct and Business Partner Code of Conduct.
2. A confidential, independently operated hotline for employees and business partners to voice concerns and potential violations of the Codes of Conduct. The hotline is accessible via email, web and telephone. Contact information is displayed at all sites around the world to ensure that all employees and temporary workers have access.
3. A robust Due Diligence policy and related procedures that screen third-parties prior to engagement.
4. A process for providing Harsco's Business Partner Code of Conduct to high-risk third parties and requiring a written acknowledgement, certifying understanding and compliance with same.
5. Ad-hoc training on slavery and human trafficking included in Conflict Minerals training for relevant Harsco employees.

This statement will be reviewed and updated as necessary (at least on an annual basis) to ensure that it reflects current Harsco policies, processes and controls.

The board of directors of Harsco Metals Group Limited has delegated approval of this statement on its behalf to the Vice President Finance at its board meeting on 28 May 2019.



Christopher C.L. Whistler
Vice President Finance
28/05/2019