

MINECO GROUP
Annual Modern Slavery Statement

18th March 2019



MODERN SLAVERY STATEMENT

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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.

Policies and Supplier Adherence

The Mineco Group, its UK companies Mineco Limited and Mineco International Limited, and the individual Europe-based group companies (collectively "Mineco") have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in our business dealings and relationships throughout the world and to implementing controls to safeguard against modern slavery taking place anywhere within our own business or our supply chains.

Our Business and Supply Chains

At its core, Mineco is an international trader of base metals and their ore concentrates, primarily dealing directly with miners, smelters and refiners to whom it also offers and provides technical, commercial and financial advice. Mineco primarily trades within the Lead, Zinc and Copper markets, whilst also operating its own base metals mines and a lead recycling smelter and refinery. Other activities include mineral explorations, power generation from renewable energy and property development.

The group has a global reach and contracts with companies situated in many countries to buy and sell materials, equipment and services. Whilst a key office is in the United Kingdom, it also retains a presence in the Netherlands, Cyprus, Russia, Switzerland, Serbia, Bosnia-Herzegovina and Northern Macedonia. The group employs internationally in the region of 2000 people of which a small number are based in the UK.

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 also require our business partners to confirm their own commitment to policies and practices aimed at identifying modern slavery risks and prevention thereof.



Commitment to our People

Mineco is committed to providing its staff with a salary which for employees in the UK at least meets the National Living Wage and offers the required statutory leave entitlement and this is consistent in the other jurisdictions we operate within whereby we offer local living wages and comply or exceed local statutory employment benefits. In the UK, we are able to utilise the skills of employees from across the world, and we ensure all our staff have provided their National Insurance Number, and Working Visa if applicable, prior to their employment. Necessary checks are performed to determine their eligibility to work in the UK and we ensure their salary will be monitored by HMRC, with payments of net salaries being made only to the employee's own bank account.

Due Diligence

Mineco understands that the inherent nature of international trade makes it difficult for absolute confidence in the measure of the Modern Slavery Act 2015 being adhered to throughout the chain but is confident that the following measures minimise the risk:

1. All staff have been made aware of the Modern Slavery Act 2015 and its provisions.
2. Strong personal relationships with customers and suppliers through various levels of a company are key to Mineco's business and staff regularly travel worldwide to visit mines, smelters, refineries, factories and warehouses and attend numerous industry conferences. The nature of those regular visits and close relationships taken together with the competitive nature of the industry means it would be highly likely for news of improper practices to become open knowledge.
3. All new customers and suppliers go through compliance checks including criminal background checks for directors and officers.
4. Mineco's standard Sale and Purchase contracts have clauses whereby customers and suppliers confirm initial compliance with the Modern Slavery Act 2015 and commit to ongoing compliance. A breach of this clause in our contracts permits Mineco to immediately terminate the contract.
5. Mineco will not transact with any suppliers or customers who have committed an offence under the Modern Slavery Act 2015 or known to be under investigation for an offence under the Modern Slavery Act 2015.



Assessment of Effectiveness in Combating Modern Slavery

We use the following key performance indicators to measure how effective the steps we have taken have been:

1. Staff training levels.
2. Actions taken to strengthen supply chain auditing.
3. Steps taken to upskill high-risk suppliers and assessing their ability to detect and mitigate modern slavery in their supply chains.
4. Investigations into any reports of Modern Slavery and how they were resolved.

Conclusion

At the time of this Statement being written, no instances or indicators of modern slavery have been found within the Mineco group of companies and our supply chain.

Approved and signed by the Director

Bojan Popović

Mineco Limited

Mineco International Limited

Issued on 18th March 2019

Previous financial year end

31st December 2018