

Statement on behalf of Harsco Metals Group Limited:

Introduction

This statement sets out the actions that Harsco Metals Group Limited takes to ensure that slavery and human trafficking is 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 2020.

Organisation

Harsco Metals Group Limited is registered in the United Kingdom and a subsidiary company of Harsco Corporation. Harsco Corporation is a diversified global provider of industrial environmental services and engineered products and was incorporated in the state of Delaware, USA with the head office based in Camp Hill, Pennsylvania, USA. In May 2019 Harsco announced that it was rebranding its Metals and Minerals division as Harsco Environmental. In line with the rebranding, a new Harsco Environmental website (www.harsco-environmental.com) together with an updated Corporate website (www.harsco.com) were launched.

The ultimate United Kingdom registered parent company of Harsco Metals Group Limited is Harsco Investment Limited which acts as an intermediate holding and finance company to the business units operating within the United Kingdom.

The core activity of Harsco Metals Group Limited is the provision of specialised services and environmental solutions throughout the entire metals production process of the steel industry in the United Kingdom along with management services. Further activities include the processing of steel slag and the sale of resulting road surfacing aggregates.

Harsco Corporation is also the ultimate parent of two further divisions in the UK, Harsco Rail and Altek. Although Harsco Rail and Altek do not qualify for the submission of independent MSA Statements, the information regarding the measures Harsco take in combating modern slavery practices outlined in this Statement and all other Harsco Policies are equally applicable to their operations.

Codes of Conduct and Related Policies

Harsco is an equal opportunity employer who believes every human being has the right to be treated with dignity and respect. Harsco's Human Rights Policy - as guided by the U.N. Guiding Principles for Business and Human Rights - prohibits unlawful discrimination, including freedom from harassment, bullying and abusive conduct. Harsco is committed to upholding human rights in all of its operations and facilities both within the United Kingdom and worldwide. Harsco does not condone or permit the use of physical punishment, modern slavery, servitude, human trafficking, or child, forced or involuntary labour in any of its operations or supply chains. Harsco will not knowingly conduct business with, and will terminate business dealings with, any supplier, contractor or other business associate who violates these standards.

In furtherance thereof:

1. There is an acknowledgement of Harsco's Human Rights Policy, including the prohibition of slavery and human trafficking within the Harsco Code of Conduct and the Business Partner Code of Conduct. Available in multiple languages, these are published in hard-copy formats and made accessible internally on the Harsco intranet and externally on the Harsco public website.

It is the duty and responsibility of each employee and business partner to understand and comply with the Codes of Conduct.

2. Each new employee must review and sign a certification acknowledging receipt of and orientation to the Code of Conduct.
3. All employees are provided with reminders of Harsco's commitment to the standards in the Code of Conduct. This could include training, articles in Division newsletters, bulletin board announcements, portal posting (with site-level exposure for those without internet access) and other presentations.
4. Constant reviews of the status of Harsco's compliance with the Code of Conduct is administered.

Integrity Line - A confidential, independently operated hotline (the "Integrity Line") is available without retaliation for employees and business partners to voice concerns and potential violations of the Codes of Conduct. The Integrity Line is accessible via web and telephone in multiple languages. Contact information is displayed at all sites and offices throughout the world to ensure that every employee and temporary worker has access.

Conflict Minerals - Harsco is committed to the responsible sourcing of conflict minerals and comply with laws that require disclosure of their use. Harsco's Conflict Minerals Policy provides guidance and instruction on the identification and prevention of the risks associated with Conflict Minerals which include, along with slavery and human trafficking, military conflict, human and labour rights violations and damaging impacts on the environment. Where deemed necessary specific training is conducted for relevant Harsco employees to ensure global compliance with this Policy.

Health and Safety – Harsco actively promotes the health and safety of all its workers. A Corporate Health and Safety Policy defines Harsco’s commitment and application across all Harsco divisions, subsidiaries, third party businesses, contractors and visitors. Harsco ensures that in each of its locations there is access to clean drinking water, restrooms, adequate lighting and ventilation, emergency exits and first aid equipment. Harsco also complies with fair wage and hour laws.

COVID19 – throughout the duration of the Coronavirus pandemic, HarscoCares COVID-19 Global Principles have been implemented to allow employees to work in a safe environment. Adherence to these principles is required at all Harsco facilities, except to the extent applicable laws or agreements prohibit them or require higher or different standards.

Due Diligence of Supply Chains

A robust Due Diligence (and related procedures) policy has been implemented for Harsco’s procurement teams to review and assess individual or company suppliers, contractors and third parties (“Suppliers”) and business partners (“Partners”).

Harsco’s standard Terms of Purchase in the UK and in several other jurisdictions include a clause dedicated to Modern Slavery which clearly states that Harsco prohibits the other party from engaging in any Modern Slavery Practices within their businesses or their supply chains in connection with any trade or contract with Harsco.

To identify and screen potential at-risk Suppliers and Partners prior to engagement or contract, Global Compliance and Ethics Guidelines have been developed and as an initial step in the due diligence process; these guidelines include the completion of a Due Diligence Questionnaire. The Questionnaire specifically requests details of their compliance with laws, including the UK Modern Slavery Act and laws and regulations concerning money laundering, bribery, fraud and corruption and, if there has been non-compliance, it asks for an explanation and details of any investigation or legal action. Further, the questionnaire ask if the Suppliers and Partners are willing to certify that their operations are free of any instances of slavery or human trafficking and, if not, to explain such reasons.

Harsco’s relationship with its Partners and Suppliers are often long term. Harsco requires its Partners and Suppliers to comply with all legislation in the jurisdiction where they operate and encourages them to meet the equivalent standards to Harsco’s own ethical conduct, labour, welfare, health and safety, environment, civil liberties and human rights.

Harsco’s published [Business Partner Code of Conduct](#) describes the standards of behaviour required by law as well as professional conduct determined to best meet Harsco’s commitment to integrity and ethical business practices. A process is in place for providing Harsco’s [Business Partner Code of Conduct](#) to Partners and Suppliers with the requirement to return a written acknowledgement, certifying understanding and compliance.

Harsco has an expectation for Partners and Suppliers to implement their own codes of conduct and standards within their own supply chains.

Future Steps

Harsco recognises that the threat of modern slavery is not a static situation and intends to:

- Continue with awareness and training programmes for employees, Partners and Suppliers based within the UK and internationally;
- To further examine and understand potential future risks associated with modern slavery and conflict minerals, including how Harsco can ensure the prevention of these practices within its business and supply chain.
- Monitor and develop increased transparency within the supply chain process.

As Harsco's circumstances, business and locations change, and the nature of Modern Slavery evolves, this statement will be reviewed and updated at regular intervals or as necessary (at least on an annual basis) to ensure that it reflects current Harsco policies, processes and controls.

This statement has been reviewed by the board of directors of Harsco Metals Group Limited who authorise and delegate the approval and signature of this statement on its behalf to Harsco Environmental Vice President and Chief Operating Officer as agreed at the board meeting held on 7 June 2021.



A. Russell Mitchell
Harsco Environmental Vice President and Chief Operating Officer
8 June 2021