

Slavery and human trafficking policy

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibly to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

Organisational structure

We are a manufacturer and machinist of Titanium Products. VSMPO Tirus Ltd is a wholly owned subsidiary of VSMPO-AVISMA Corporation, our ultimate parent company. The group has its head office in Russia with offices in Switzerland, Germany and the USA.

The group has an annual turnover in excess of \$1.6bn.

Our supply chains - include the sourcing of raw materials principally related to the production of Titanium.

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. This statement reflects 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.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk -

- We run our UK distribution and machining centre to ensure optimum control of the work environment;
- Our supply chain is fully integrated within VSMPO-AVISMA Corporation, ensuring optimum control of the supply chain.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Supplier adherence to our values - We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

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 relevant members of staff. All Directors have been briefed on the subject.

Our effectiveness in combating slavery and human trafficking

We use the following 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:

- Use of labour monitoring and payroll systems.
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Colin Whitehouse, Managing Director VSMPO Tirus Limited.