

MODERN SLAVERY ACT TRANSPARENCY STATEMENT FOR 2018

Introduction

The CNIM Group has set in place a voluntary CSR (Corporate Social Responsibility) policy.

Respect for fundamental rights at work is at the heart of the CNIM Group's corporate responsibility and ethics policy, integrating unreservedly in its governance the principles and rights of the International Labor Organization (ILO) Declaration of 1998, as well as the Modern Slavery Act of 26 March 2015.

The present statement is made pursuant to Section 54 of the Modern Slavery Act 2015, and sets out the steps CNIM SA has implemented to ensure that slavery and human trafficking are not taking place in its business or in its supply chains.

I. CNIM organization and businesses

For more information regarding the Company organization and its businesses, please refer to our website:

- [Integrated Report](#)
- [Registration Document](#)

II. Policies and practices

For more information on our policies regarding slavery and human trafficking, please refer to our website:

- [Declaration of the Management Board](#)
- [Group Purchasing Policy](#)
- [Group Whistle Blowing Procedure and Contact](#)

III. Supply chain and due diligence process

Our supply chain mainly consists in:

- Goods,
- Services at construction sites,
- Services at our production and operation sites.

Since 2017, in order to take better account of slavery and human trafficking, and the human rights at work, we have improved:

- the CNIM pre-qualification Supplier Questionnaire, that all new suppliers have to complete and sign before any contract,
- the CNIM General Conditions of Purchase, attached to all our purchase orders.

By signing those documents, our suppliers commit together and in cooperation with CNIM to comply with those principles, and to ensure that their own subcontractors shall so comply.

In addition to this process, in 2018, CNIM decided to experience on-site suppliers' audits regarding social, environmental and ethical aspects. These audits are conducted by a specialized auditing company, based on the SMETA 6.0 requirements, adapted to the Group specific needs.

For 2019, the objective is to carry out 15 audits for strategic suppliers located in a country considered "at risks". In case improvement opportunities are identified, the relevant Purchasing Departments run the corrective action plans in cooperation with the suppliers.

IV. Training and awareness

CNIM Group will conduct awareness trainings for its employees to ensure compliance with legal requirements and regarding Modern Slavery, in the countries or situations at risk.

This statement, covering financial year ending 31 December 2018, has been approved by the Management Board of CNIM SA, and duly signed by the Chairman of the Board.