

## **Victrex plc Modern Slavery and Human Trafficking Statement for the Financial Year 2021**

As required by the Modern Slavery Act 2015 section 54(1) (the "Act"), this statement outlines the steps that Victrex has taken during the Financial Year ended 30 September 2021 ('FY21') to ensure slavery and human trafficking is not present within our supply chains or our own business. Victrex plc is making this statement on behalf of itself and its group companies which are required to make a statement under the Act, namely Victrex Manufacturing Limited and Invibio Limited. The actions detailed within the statement are being deployed to all Victrex group companies. It has been approved by the Board of Directors of Victrex plc and signed by Jakob Sigurdsson, our CEO.

### **Financial Year 2021**

In FY21, we have continued to strengthen our efforts to identify and mitigate the risk associated with Modern Slavery, primarily by further adapting our processes to support suppliers and supplier management during the COVID-19 pandemic, whilst developing ways to monitor risk while travel restrictions remain in place. This statement details our current policies and working practices, how we continue to assess our risk and sets commitments for the coming year.

### **Our Business and Structure**

Victrex is an innovative world leader in high performance materials, serving a diverse range of markets. Every day, millions of people rely on products or applications which contain our thermoplastic polymers (plastics), from smartphones, aeroplanes and cars to oil & gas platforms and medical devices.

Our headquarters and manufacturing facilities are primarily based in the UK (our parts manufacturing businesses are based in the US and we are also investing in a new facility in China to come online in late 2022). We are a major exporter (we export approximately 98% of our material from the UK), with technical and customer support facilities located across our major markets, serving more than 40 countries. As a global business, we have over 800 employees in 16 countries across the world. A detailed description of our business model and values can be found in our Annual Report on our website, [www.victrexplc.com](http://www.victrexplc.com).

### **Our Policies, Procedures and Values**

Our ethical principles are set in our Global Code of Conduct and underpin the way we do business and treat one another. This Code sets the foundations of how we act personally, with others and in our communities making clear that we do not tolerate modern slavery. As an organisation with an embedded Continuous Improvement philosophy, our approach to these matters is constantly evolving. We regularly review our policies to identify areas for update and improvement. We believe that our continued success as a business rests on maintaining these principles and ensuring we strive to always to "do the right thing".

We have in place a Modern Slavery & Anti-Human Trafficking Policy first adopted in 2016 and which has been reviewed and updated during FY21. Key changes within the latest iteration were linked to updates to Procurement processes, interactions with the supply chain and improvements to supplier performance management. The policy details our zero tolerance approach to slavery and human trafficking and emphasises that the prevention, detection and reporting of slavery and human trafficking that may be connected with any part of Victrex's

business or supply chains is the responsibility of all those working for Victrex, or under Victrex's control. Our Global Whistleblowing Policy is actively monitored and reviewed by the Audit Committee and employees are encouraged to raise any concerns through this process.

Deploying our high standards in relation to the matters above, within the Supply Chain remains of critical importance to Victrex. Procurement follow robust Supplier Approval and Supplier Management processes to ensure that no supplier is used before their own process and approach to Modern Slavery have been assessed and approved. Our Victrex Supplier Standards Handbook ('the Handbook') forms part of our Supplier Approval and Management processes with a copy being provided to all key raw material suppliers as part of our On-Boarding process. We continue to cascade this across our wider supply base. Refreshed and updated with pertinent points of legislation, the Handbook outlines and expands upon the values core to Victrex and clearly communicates our expectations. It includes specific prohibitions against the use of forced, bonded or involuntary labour, whether adults or children, and requires suppliers to adhere to slavery and human trafficking laws. In line with compliance to the most stringent standards of quality, we encourage our suppliers to cascade these values through their own supply chains. The principles contained in the Handbook have now been included in our standard terms and conditions as part of our contracts. We include slavery and human trafficking provisions in all new contracts with our raw material suppliers, as well as requiring adherence to the Handbook.

We understand the correlation between conflict minerals and modern slavery. In ensuring that the Victrex supply chain is free of 'Conflict Minerals', our suppliers are expected to supply materials which are 'DRC Conflict Free'. We also have a Conflict Minerals Policy as part of our Global Code of Conduct and our suppliers are expected to have policies, management systems and conduct due diligence to ensure compliance. A copy of our Conflict Minerals Statement is available on [www.victrexplc.com](http://www.victrexplc.com)

Within our multi-layered desktop assessments, specific attention is given to the supplier's policies relating to Corporate Social Responsibility as part of our Supplier Approval and On-Boarding activity.

### **Our People - Recruitment Processes**

We have clear procedures in place designed to ensure that we comply with legal requirements in relation to the recruitment of all employees, including national minimum wage, immigration requirements and other national legislative requirements. Whilst the vast majority of our people are employees within the Victrex group, from time to time we use specialist third party services to support our requirements across a number of our professional, strategic and operational areas, either through the engagement of consultants or agency personnel. The agencies we work with are required to demonstrate to us that they have conducted our required preemployment checks.

### **Supply Chain Overview**

Our supply chain is primarily focussed on the sourcing of goods, services and raw materials to support the manufacture of polyaryletherketone (PAEK) polymers, semi-finished and finished products, with over 1500 finished product SKU's (stock keeping units). We have over 100 strategic suppliers based across 14 countries and a Global Procurement Function, staffed by a professionally qualified procurement team, which is managed from our UK headquarters.

**Assessment of Risk**

We continue to assess specific geographical or industrial sector risk within our supply chain and factor this into our supplier risk management activities. Bi-monthly Supplier Management Forums monitor any perceived area of risk and concern - none became apparent during the last financial year. We continue to monitor closely any territory or industry which scored highest in our risk assessment. We also continue to evolve our partnerships with external intelligence providers to form a broad basis for detailed information gathering and analysis, helping us to focus on activity within the wider supply chain.

**Due Diligence & Strategic Supplier Management**

As part of our pre-qualification procedures, strategic suppliers are required to complete our in-depth Supplier On-Boarding process and subsequent site audit to confirm that they meet our standards. The on-boarding and assessment of critical suppliers underpins our supplier management process, allowing us to conduct the appropriate level of due diligence. Our Supplier Management Forum facilitates active and on-going supplier performance management. This cross functional forum focuses on suppliers of strategic materials and services, implementing a risk-based scorecard approach, regularly evaluated to assess performance based on key criteria, including CSR factors. This also provides the key areas of focus for supplier development activity, which we undertake on a targeted approach to risk for both new and existing suppliers.

**Training & Awareness**

Training is on-going across all supplier facing teams to ensure they receive up to date modern slavery and human trafficking awareness training. In addition, we have introduced mandatory annual awareness training on our Global Code of Conduct for all our employees, which includes modern slavery and conflict minerals.

**Measuring Effectiveness**

Through our Supplier Management Forum, which monitors the performance of our supply base, we have established KPIs to allow us to measure the effectiveness of our rolling supplier audit and compliance programme. During FY21, no flags on ethical matters (including slavery and human trafficking) have been identified.

**Our On-Going Commitment**

Victrex remains committed to giving matters relating to Modern Slavery and Human Trafficking the highest level of attention, maintaining standards both internally and with third parties. We will continue to develop, evolve and roll out our policies and procedures to our stakeholder network.

**Jakob Sigurdsson**  
**Chief Executive Officer**