



Victrex is committed to conducting business ethically and responsibly. We have a zero-tolerance approach to modern slavery and human trafficking and are committed to maintaining appropriate systems and controls designed to help prevent these practices in our own operations and across our supply chain and distribution networks.

This commitment applies across Victrex plc and its subsidiaries, and to employees and others acting on our behalf, including contractors, agents, consultants and business partners.

Our approach

We recognise that modern slavery can take a number of forms, including slavery, servitude, forced and compulsory labour and human trafficking.

We take a risk-based approach to identifying, assessing and addressing modern slavery and human rights risks within our own operations, workforce, supply chain and wider business relationships. Our assessments consider groups that may be more vulnerable to exploitation or adverse human rights impacts, including our own employees, contractor and agency workers, third-party employees within our supply chain, women, children and local communities that may be affected by our business activities.

We expect our suppliers, distributors and other business partners to meet equivalent standards and to promote responsible practices within their own supply chains.

Our approach includes:

- communicating clear expectations through our Code of Conduct and supplier standards;
- conducting appropriate due diligence and risk assessments for new business relationships, including mergers, acquisitions, joint ventures and other strategic partnerships;
- embedding relevant obligations into our contractual arrangements;
- applying a risk-based approach to assessing and periodically reviewing suppliers and relevant third-party relationships, including consideration of their approach to modern slavery and human rights; and
- we seek to monitor the effectiveness of our approach through ongoing review, oversight of supply chain controls and continuous improvement activities.

Governance and oversight

Oversight of this area is supported at management level, with defined responsibilities for implementation, monitoring and continuous improvement. Day-to-day responsibility for implementation sits within the Supply Chain function, supported by management teams across the organisation.

Training and awareness

We provide training and guidance to relevant employees, particularly those involved in supplier (or distributor) facing activities, to support understanding of modern slavery risks and responsibilities.

Speak-up and reporting

We encourage the prompt reporting of concerns or suspicions relating to modern slavery or human rights issues in any part of our business or supply chains. Concerns may be raised through management channels or under our whistleblowing arrangements.

Where concerns are identified, we are committed to taking appropriate action, which may include further investigation, remediation and, where necessary, termination of business relationships.



Modern Slavery, Human Trafficking and Human Rights

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Human rights principles

Our approach is underpinned by a broader commitment to human rights and responsible labour practices. This includes fair pay and benefits in accordance with applicable legal requirements, compliance with applicable working time, overtime and rest period laws, respect for freedom of association and collective bargaining, ethical recruitment, dignity at work, equality of opportunity and a workplace free from discrimination, harassment and child labour. We seek to engage constructively with employee representatives where applicable and to manage working arrangements in a way that supports legal compliance, wellbeing and business needs.

Important Note

This statement summarizes Victrex's Modern Slavery, Human Trafficking and Human Rights Policy and is provided for general information only.