

Anti-Bribery & Corruption

In this statement, 'Victrex' refers to Victrex plc and its subsidiaries. At Victrex, we are committed to conducting business with integrity, transparency and accountability. We take a zero-tolerance approach to bribery and corruption in all forms. This commitment applies across our operations and to employees, as well as to third parties acting on our behalf.

Our Anti-Bribery and Corruption Approach

We prohibit the offering, giving, requesting or acceptance of any bribe or improper advantage, whether directly or through third parties.

This includes, for example: bribes, kickbacks and facilitation payments; improper gifts, hospitality or other benefits (which are subject to internal policies and controls); conduct intended to improperly influence business decisions or outcomes; and the use of third parties to engage in prohibited behaviour on our behalf.

We are committed to complying with applicable anti-corruption laws in the jurisdictions in which we operate and to applying consistent standards across our business.

Risk Management and Controls

Victrex operates risk-based policies, procedures and controls designed to prevent, detect and respond to corruption risks. These include risk-based due diligence on third parties acting on our behalf, ongoing monitoring of business relationships, processes to identify and appropriately escalate potential red flags or risk indicators, and requirements for accurate record-keeping and transparent financial reporting.

Employees are expected to be aware of potential risks and to raise concerns in accordance with our policies.

We expect third parties acting on our behalf to comply with equivalent anti-bribery and corruption standards.

Gifts and Hospitality

Victrex recognises that the exchange of reasonable and appropriate business gifts and hospitality can form part of legitimate business relationships. Such activities are subject to policies and controls designed to ensure they are lawful, proportionate and reasonable, transparent and not intended to improperly influence business decisions or outcomes. Cash or cash equivalents as part of gifts and entertainment are prohibited.

Charitable Donations and Sponsorship

Victrex only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices and which are in accordance with Victrex's internal policies and procedures.

Higher-Risk Interactions

Victrex recognises that certain interactions may present elevated corruption risk. Controls are in place to address these risks, including where we engage with public officials and politically exposed persons, healthcare professionals and related organisations together with third parties operating in higher-risk environments.



Speak Up and Accountability

We encourage employees and third parties to raise concerns or suspicions regarding potential misconduct through appropriate reporting channels. Victrex maintains procedures for reporting, assessing and, where appropriate, investigating suspected breaches of its policies. We are committed to supporting a culture in which concerns can be raised in good faith.

Breaches of our policies are taken seriously and may result in appropriate action, including investigation, remediation and, where necessary, disciplinary measures or termination of business relationships.

Governance and Oversight

Our anti-bribery and corruption approach is supported by governance processes designed to promote effective implementation and oversight, including:

- leadership accountability and oversight;
- policy communication and training; and
- monitoring and periodic review of controls.

Training and awareness activities are provided on a risk and role basis to support understanding of relevant anti-corruption risks, responsibilities and expected standards of conduct.

Important Note

This statement summarizes Victrex's Anti-Bribery and Corruption Policy and is provided for general information only.