

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

1. Policy statement

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Futamura has a zero-tolerance approach to modern slavery and the Company is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the business or in any of the supply chains.
- 1.2 Futamura is also committed to ensuring there is transparency in the business and in the approach to tackling modern slavery throughout the supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all contractors, suppliers and other business partners, and as part of the contracting processes, the Company includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and it is expected that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for Futamura Chemical UK Ltd or on behalf of the Company in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4 This policy does not form part of any employee's contract of employment and it may be amended at any time.

2. Responsibility for the policy

- 2.1 The Senior Management team has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under their control comply with it.

- 2.2 The Human Resources Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.
- 2.4 Feedback on this policy is invited to suggest ways in which it can be improved. Comments, suggestions and queries are encouraged and if internal should be addressed to the HR Manager and all external queries should be addressed by the Procurement Manager.

3. Compliance with the policy

- 3.1 All persons working for Futamura Chemical UK Ltd must ensure that they read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for Futamura or under the Company's control. All persons are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 If it is believed or suspect that a conflict with this policy has occurred or may occur in the future, this should be notified to the HR Manager / Procurement Manager as soon as possible.
- 3.4 It is encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If it is believed or suspect a breach of this policy has occurred or that it may occur all persons must notify their manager or the HR Manager / Procurement Manager and report it in accordance with the Company's Whistleblowing Policy, as soon as possible.
- 3.6 If it is unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the supply chains constitutes any of the various forms of modern slavery, raise it with a line manager or the HR Manager / Procurement Manager.

3.7 The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Futamura is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the business or in any of the supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any persons believe that they have suffered any such treatment, they should inform the HR Manager / Procurement Manager immediately. If the matter is not remedied, and the person is an employee, this should be raised formally using the Grievance Procedure, which can be provided by the Human Resources Department.

4. Communication and awareness of this policy

4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for Futamura, and training will be provided as necessary.

4.2 Our commitment to addressing the issue of modern slavery in the business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate thereafter.

5. Breaches of this policy

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 The Company may terminate relationships with other individuals and organisations working on behalf of the Company if they breach this policy.