



Toray Advanced Composites

Statement on the UK's Modern Slavery Act

Toray Advanced Composites UK, as one of the group companies of Toray Industries Inc., is issuing this statement, which describes our efforts in fiscal 2025 to prevent slave labor and human trafficking in its business and supply chain, pursuant to Article 54 of the UK Modern Slavery Act. In addition, the most significant of the recent August 2026 revisions to certain Toray policies are included in this statement.

1. Toray Group organization, business areas, and supply chain

Toray Advanced Composites UK (hereafter "TACUK")

TACUK is located in Nottingham, UK, and is a leading supplier to the aerospace industry, providing advanced thermoset composite materials for the production of lightweight structures.

Toray Group

Toray Industries, Inc. is the parent company for the Toray Group. TACUK is owned by Toray Advanced Composites Holding B.V. which is owned by Toray Industries, Inc. Toray Group's global operations include those relating to textiles, functional chemicals, carbon fiber composite materials, environment and engineering, and life sciences. As of March 31, 2026, the number of affiliated companies is 308 (113 in Japan and 195 overseas), and the number of employees is 46,294 (16,540 in Japan and 29,754 overseas).

For details on the organization and business areas of Toray Group, visit the Toray Industries website.

Website of Toray Industries, Inc.

<https://www.toray.com>

Our supply chain

The Toray Group supply chain extends to diverse countries and regions around the world. In fiscal 2025, the Group's purchasing breakdown by business location was 44% in Japan, 38% in the rest of Asia, 5% in Europe, and 13% in the Americas, while the purchasing breakdown by business segment was 31% Fibers & Textiles, 23% Plastics & Chemicals, 15% Films, 13% Carbon Fibers Composite Materials, and 18% others.

Toray Group suppliers engage in a wide range of industries, from general trading

companies and specialized traders to worldwide producers of petrochemicals, fuels, pharmaceuticals, molded products, packaging materials, machine tools, precision equipment, machine parts, materials processing and more. Depending on the purchasing environment, required specifications, and other factors, Toray Group engages in either regular or spot transactions and purchases from a wide range of more than 4,700 primary suppliers with offices around the world.

As part of the Toray Group, TACUK is following the “Sustainability Procurement Initiatives.” The initiatives are integrated into the management philosophy and long-term corporate vision and adhered to by all Toray Group companies.

Sustainability Procurement Initiatives

https://www.toray.com/sustainability/activity/supply_chain/procurement.html

2. Toray Group policy regarding prevention of slave labor and human trafficking

(1) Toray Philosophy

Toray Industries, Inc. was established in 1926, based on the principle of “realizing that corporations are public institutions of society and contributing to society through our business.” Ever since, Toray Group has sought to earn the respect of society. The Group has organized its principles including the corporate philosophy of “contributing to society through the creation of new value with innovative ideas, technologies and products” in the form of the Toray Philosophy.

Toray Philosophy

<https://www.toray.com/aboutus/philosophy.html>

In the Toray Philosophy, the Corporate Guiding Principles include: “Ethics and Fairness: Acting with fairness, high ethical standards and a strong sense of responsibility while complying with laws, regulations and social norms to earn trust and meet social expectations” and “Respect for Human Rights: Fulfilling our responsibility to respect human rights as a good corporate citizen.” The Group has also established the Ethics & Compliance Code of Conduct and the Toray Group Policy for Human Rights as guidelines for those issues.

A. Ethics & Compliance Code of Conduct

Toray Group believes that respect for human rights is an essential management pillar in order to conduct business activities while building good relationships with all stakeholders. Based on this recognition, the Ethics & Compliance Code of Conduct includes items related to human rights compliance: “respecting the character and individuality of employees,” “preventing harassment and discrimination,” and “respecting the human rights of all stakeholders.” This is an important compliance rule that all officers and employees of Toray Group must follow.

Ethics & Compliance Code of Conduct

<https://www.toray.com/sustainability/activity/compliance/culture.html>

B. Toray Group Policy for Human Rights

Toray Group has established the Toray Group Policy for Human Rights in order to clarify its stance on respect for human rights. As part of this policy, the Group declares that it respects international norms such as the UN Universal Declaration of Human Rights, the ILO Conventions and the UN Guiding Principles on Business and Human Rights, and it strives to fulfill its responsibility to respect human rights as a good corporate citizen. It declares that it will not engage in child labor, forced labor, or unfair low-wage labor, and that it will strive to promote respect for human rights throughout the business supply chain. The Group will not participate in human rights violations.

Moreover, Toray Group positions respect for human rights as one of its key management priorities, revising the Toray Group Policy for Human Rights in August 2026 to further promote measures that address global human right issues. The revision helped clarify the Group’s perspective on and approach to internationally recognized human rights issues.

Toray Group Policy for Human Rights

<https://www.toray.com/sustainability/activity/personnel/>

(2) Promoting Toray Group Sustainability

Toray Group embodies its corporate philosophy by integrating its business strategy and CSR activities to help solve social issues through business activities. To promote CSR activities, the Group has established CSR Guidelines and Toray

Group CSR Procurement Policies.

A. Toray Sustainability Principles

In its long-term management policies, TORAY Challenges 2035, and medium-term management program, IGNITION 2028, Toray Group addresses requirements under a wide range of sustainability initiatives. To become a highly profitable company that contributes to society, the Group is committed to achieving improvement in both social value and economic value by shifting the focus of regulatory compliance efforts and value-creation activities to the “environment” and “people.” Based on this approach, Toray Group integrated previous CSR activities into its sustainability framework and, in March 2026, established the Toray Sustainability Principles as a new set of guiding principles that form the foundation of Toray Group sustainability initiatives.

Toray Sustainability Principles

https://www.toray.com/sustainability/sustainability_promotion/

B. Toray Group Sustainability Procurement Policies

Toray Group is promoting sustainability procurement by focusing on issues to be addressed together with its supply chain. While the Toray Group Sustainability Procurement Policies specify the Group’s commitment to building a supply chain that incorporates human rights considerations, the Toray Group Sustainability Procurement Guidelines provide specific and detailed guidelines for action requirements for suppliers. Accordingly, Toray Group suppliers are required to respect human rights, while preventing forced labor, slave labor, child labor, and unfair low-wage labor.

Further, Toray Group Sustainability Procurement Guidelines, which serves as a code of conduct for Group suppliers, were revised in August 2026 to align more closely with the Group’s various policies and to further promote initiatives related to respect for human rights and responsible sourcing within the supply chain.

Toray Group Sustainability Procurement Policies

Toray Group Sustainability Procurement Guidelines

https://www.toray.com/sustainability/activity/supply_chain/

Due diligence processes

TACUK's business partners are checked carefully before starting a new business. There is checking of company data, websites and certificates, conducting regular company visits or checking existing terror and sanctions lists.

3. Toray Group risk assessment, management and due diligence to prevent slave labor and human trafficking**(1) Identifying and minimizing human rights risks in Toray Group**

Toray Group has established the Human Rights Promotion Committee in Japan and the Global Human Rights Promotion Committee under the Ethics and Compliance Committee chaired by the president of Toray Industries. By expanding the human rights promotion activities of both committees to each Toray Industries business site and factory, as well as to affiliated companies in Japan and overseas, the Group is striving to create a positive and supportive environment in all its workplaces.

In addition, Toray Industries conducts annual surveys on human rights promotion activities, including awareness raising and education, at each business site, factory, and major affiliated company. The survey results are reported to the Human Rights Promotion Committee in Japan and the Global Human Rights Promotion Committee. After identifying any issues, problems, and concerns regarding human rights, including child labor, forced labor, and unfair low-wage labor, improvement measures are investigated and implemented.

(2) Sustainability procurement activities in Toray Group including respect for human rights

Toray Group is working to strengthen sustainability initiatives in its worldwide supply chain. Specifically, a Sustainability Procurement Working Group was established at Toray Industries to ascertain the status of sustainability initiatives at suppliers and to support the promotion of sustainability procurement at affiliated companies. Meanwhile, the Risk Management Committee oversees risk management for the entire Group. It regularly reports on the status of sustainability procurement and risk reduction activities group-wide, shares information, and deliberates on necessary response measures.

Toray Group has also taken a number of measures to identify human rights risks in the supply chain, including periodic implementation and evaluation of sustainability procurement questionnaires sent to major suppliers. When problems are identified, the Group requests suppliers to make improvements and follows up regularly on improvements made through visits and other means, disclosing the results of these procedures on its website. In this way, the Group is working with suppliers to advance initiatives promoting respect for human rights in accordance with the process set forth in the Due Diligence Guidance for Responsible Business Conduct issued by the Organisation for Economic Co-operation and Development (OECD).

Toray Industries sends sustainability procurement questionnaires to major suppliers every two years in principle, and comprehensively checks the status of sustainability initiatives, including responses to human rights issues. In fiscal 2024, 451 companies responded to the questionnaires sent, and the results revealed that 99% of the companies had achieved the compliance level required by Toray Industries. With the six suppliers that had not met the required compliance level, the Company conducted visits and interviews in fiscal 2025 to verify conditions on the ground and discuss and provide support with corrective actions and improvement measures (excluding one company that had ceased operations). The Toray Sustainability Procurement Working Group plans and carries out a series of on-site audits of suppliers, even those that meet the required compliance level, in industries where the risk of negative impact is a concern. In fiscal 2025, the Company conducted audits of three suppliers. Following an audit, suppliers are presented with both an audit report and a follow-up sheet requesting that the supplier take measures for improvement. The Company then checks in intermittently to confirm progress on the improvements indicated on the follow-up sheet. In addition, over the four-year period from fiscal 2022 to fiscal 2025, Toray Industries presented a total of 714 major suppliers with the Toray Group Sustainability Procurement Guidelines, requesting their understanding of and compliance with these guidelines and submission of written confirmation of their consent. As a result, by the end of March 2026, 647 suppliers have signed letters of consent, further strengthening sustainability promotion throughout the supply chain.

Each affiliated company in Japan is continuously working to improve its internal systems and rules for sustainability procurement, and sends sustainability procurement questionnaires to suppliers. In fiscal 2025, these companies sent

sustainability procurement questionnaires to major suppliers, receiving responses from 992 suppliers. The questionnaires are used to confirm progress on sustainability at suppliers, as well as to provide feedback on ratings results to suppliers. Affiliated companies are proceeding with investigations and requests for improvement of suppliers identified as requiring further investigation. Affiliated companies also present major suppliers with the Toray Group Sustainability Procurement Guidelines, requesting their understanding of and compliance with these guidelines. Over the four-year period from fiscal 2022 to fiscal 2025, the guidelines were presented to a total of 1,565 suppliers. By the end of March 2026, a total of 1,483 suppliers confirmed their consent and signed letters of consent.

Affiliated companies outside Japan also present major suppliers with the Toray Group Sustainability Procurement Guidelines, requesting their understanding of and compliance with these guidelines. Over the four-year period from fiscal 2022 to fiscal 2025, the guidelines were presented to a total of 2,519 suppliers. By the end of March 2026, a total of 2,096 suppliers have confirmed their consent and signed letters of consent.

Furthermore, as part of an effort to minimize risks and detect problems early, a dedicated hotline system which includes the Corporate Ethics and Legal Compliance Helpline, has been established that allows employees to report and discuss any human rights issues within Toray Group. Once a human rights complaint has been made, the hotline and the department in charge of the investigation work together to address the complaint. The facts are investigated with complete discretion to protect against any risk of negative impact on the individual reporting to or consulting with the hotline. If a problem is found, corrective guidance is provided to the department concerned, and appropriate measures are promptly taken. Toray Group has set up a hotline that enables anyone concerned to report and consult on human rights issues in the Group's supply chain. The hotline takes action in response to information received.

Whistleblowing System

<https://www.toray.com/sustainability/activity/compliance/culture.html>

4. Training

In addition, Toray Group has organized information concerning the Ethics & Compliance Code of Conduct and the Corporate Ethics and Legal Compliance

Helpline to ensure a thorough understanding among all Toray Group officers and employees, including those at affiliated companies worldwide. Further, in fiscal 2025, human rights awareness brochures were distributed to all officers and employees at Toray Industries and its affiliated companies in Japan. Human rights workshops were also held at each company, and online training was carried out to further understanding of the Ethics & Compliance Code of Conduct and the Toray Group whistle-blowing system. In this way, the Group has worked to foster a workplace culture that respects the dignity of others. For affiliated companies outside Japan, the Group provided educational materials to facilitate compliance training tailored to the conditions of each country or region.

Based on education materials provided by Toray Industries, Inc., TACUK also follows the Ethics & Compliance Code of Conduct to support employees, managers, and business partners in recognizing, reporting and eliminating misconduct. Acts of misconduct are defined within Toray's internal policies and guidelines and are to be observed in addition to violation of any national or EU laws. Furthermore, it clearly defines the reporting procedures and channels, stipulating the right to report.

The Toray Group also implemented a new initiative in fiscal 2025, an e-learning program designed to promote understanding of DEI (diversity, equity, and inclusion) and unconscious bias.

The Toray Industries Purchasing and Logistics Division regularly holds sustainability procurement training sessions and seminars for employees in charge of purchasing and logistics operations. In order to raise the awareness and skill level of employees in charge of these operations, the sessions cover the laws, regulations, and taxation systems with which companies must comply in their purchasing and logistics operations. The Company continuously promotes awareness of sustainability procurement among affiliated companies in and outside of Japan by distributing in-house educational materials that summarize the need for sustainability procurement, the activities required, and examples of the risks involved. In fiscal 2025, Toray Group held compliance-related briefings for suppliers and briefings on basic logistics policy for logistics subcontractors to explain and educate on the Toray Group Sustainability Procurement Guidelines. Affiliated companies outside of Japan also provide human rights-related education to their textile processing subcontractors in Asia.

5. Monitoring and Assessment

With its sustainability procurement questionnaires, Toray Group has established a due diligence process based on its own unique questionnaire survey system to regularly monitor sustainability initiatives at suppliers, assess conditions based on uniform standards that apply across the entire Group, provide assessment feedback to suppliers, and follow up with companies receiving poor assessments. This system raises supplier awareness, as well as efficiently and effectively identifies, prevents and reduces sustainability-related risks in the supply chain. Through this process, Toray Group recognizes suppliers meeting the required compliance level as sustainability procurement partners. In fiscal 2025, Toray Industries conducted individual site visits and interviews with six companies (excluding one company that had ceased operations) that had failed to meet the required level of CSR compliance as confirmed in the fiscal 2024 CSR procurement survey. During these visits, the Company verified conditions on the ground and held discussions to provide support with corrective actions and improvement measures.

When poorly assessed companies demonstrate during follow-up a lack of commitment to making improvements, continue to be poorly assessed in sustainability procurement questionnaires, take no corrective action for serious violations, or otherwise fail to meet the compliance levels that Toray requires, Toray Group may reevaluate further transactions with the supplier. Further, the Group has established the Toray Group Supply Chain Sustainability Promotion Guidebook, which is regularly distributed to suppliers as educational material during sustainability procurement survey feedback sessions, as well as at other opportunities. The guidebook is used as part of the Toray supplier education and support program to promote and strengthen sustainability along the supply chain.

The former CSR Roadmap 2025 set the rate of due diligence implementation along the supply chain as a KPI and promoted initiatives in this area. Toray Group established a process for identifying major sustainability procurement risks and suppliers requiring investigation as relates to country, region, and/or industry, as well as for conducting investigations and audits regarding the presence of risk and the implementation of improvement measures. In fiscal 2025, out of 2,519 major suppliers of 81 overseas affiliated companies, Toray Group identified three suppliers for priority review based on country/region, industry or other criteria suggesting a high risk related to human rights and labor issues, safety and health, or environmental conservation and implemented assessment. These assessments found that, at the present time, the three suppliers pose no significant risk related

to forced labor or human trafficking, nor any apparent risks requiring immediate corrective action. Toray will continue to focus on identifying and mitigating potential risk by expanding the scope of its assessments and refining assessment methods. (The Group goal for fiscal 2025 was a due diligence implementation rate of 90% or higher; actual implementation was 100%.)

Toray Group strives to identify human rights-related risks in its supply chain through such means as sustainability procurement surveys, risk assessments and audits, and a hotline for reporting and consulting on human rights issues. When an issue is identified, the Group requests that the supplier make improvements and follows up on improvements made. Furthermore, in the event that a supplier commits serious violations or fails to take corrective measures, Toray Group takes appropriate action, including reevaluating further transactions with the supplier. If Toray Group is found to have caused or contribute to any negative impact, the Group consults with the relevant parties and strives to implement appropriate corrective and remedial measures.

6. Going forward

Toray Group will continue to promote human rights, including the prevention of slave labor and human trafficking throughout the Group and its supply chain, in accordance with the Ethics & Compliance Code of Conduct, the Toray Group Policy for Human Rights, the Toray Sustainability Principles, the Toray Group Sustainability Procurement Policies, and the Toray Group Sustainability Procurement Guidelines. The Group will continue striving to improve awareness of human rights issues by providing human rights training for officers and employees, as well as via questionnaires and requests for sustainability measures given to suppliers.

For and on behalf of the Toray Advanced Composites, UK.



Jan Nowacki
Managing Director

Toray Advanced Composites, UK
30th September 2026