



AGC CHEMICALS EUROPE, LTD.

S54: Annual Statement on Slavery and Human Trafficking

This statement outlines the policies and procedures AGCCE have in place to meet the requirements of the Modern Slavery Act 2015. AGCCE has a zero-tolerance approach to modern slavery and we are fully committed to preventing slavery and human trafficking in our own business and throughout our supply chain.

Our Business

AGC Chemicals Europe Ltd (AGCCE Ltd), has its head office in Thornton Cleveleys in the United Kingdom, is part of the AGC Group of companies, specifically the AGC Chemicals division.

AGCCE Ltd manufacture and sell fluoropolymers to make highly durable plastics and coatings, resistant to corrosion and extremes of temperature.

The AGC Group is owned and run from locations in Japan, with manufacturing and sales locations within all 5 continents.

AGCCE Ltd is an independent operator responsible for its own supply chains and distribution networks. We have suppliers of Raw Materials, Packaging and Engineering spares as well as contracted service providers. The supply chain is primarily based in the United Kingdom and the rest of Europe. A number of key raw material products are provided by our parent Company in Japan.

Our Policies, Procedure and Values

The AGC Code of Conduct (“Code”) is the reflection of our Shared Value “INTEGRITY” in the AGC Group vision. It sets forth the requirements for all AGC Group companies and their employees to assure that their business conduct is consistent with laws, company policies/rules and business ethics. Our Code applies to all AGC Group businesses and their employees, directors and officers.

The AGC Chemicals approach to Corporate Social Responsibility (CSR) focusses on five areas, of which People and Community is one. This includes slavery and human trafficking. Principle Five of the Code specifically states that: “We do not use Child Labour or forced labour in any of our global operations or facilities. We fully respect all applicable laws which are related to the rights of workers.”



Training

AGCCE Ltd provides training on CSR and Business Conduct issues to all employees upon their induction to AGCCE. Refresher training is given to all customer and supplier facing staff, to ensure they receive up to date modern slavery and human trafficking awareness training.

AGCCE also deliver refresher training to all members of staff on the company's code of conduct. This training includes modern slavery and human trafficking.

Reporting

A European Regional Compliance Committee has been established under the Global Compliance Leader and confidential reporting routes are available and briefed to employees if they believe that these rules have been broken.

Within the AGC Code of Conduct the retaliation against any person for reporting a possible violation, or for participating in an investigation involving possible misconduct is prohibited and would be severely dealt with.

Monitoring

Principle Five further states: "We expect that all companies with which we do business will confirm to all applicable laws in these regards". AGCCE discharges its CSR requirements within the supply base by ensuring that becoming an approved supplier is dependant on them passing our vetting process. This is undertaken using pre-defined qualification documents.

As an ethically responsible business, AGCCE operates a supplier selection and management process through due diligence and ethical awareness of the goods and services it procures. Whilst we cannot fully understand the full detail of all activities downstream due to the volume of sub-tier suppliers involved, we do assess and monitor first-tier suppliers through our policies and procedures for compliance with S54.

Over the last 12 months, assessments of all raw materials and packaging suppliers have been undertaken with no requirements for further investigation.



There will be a continued focus on companies that provide a service to AGCCE Ltd, where people are a key resource. In addition, over the next 12 months AGCCE's main raw material suppliers will be a focus for assessing compliance with our principles and policies.

Effectiveness

Any occurrences which breach the group and local policies and procedures are required to be reported to the Regional Compliance Committee. During the last financial year there have been no breaches found or reported.

This statement has been approved by the AGCCE Ltd Board of Directors and will reviewed on an annual basis.

A handwritten signature in blue ink, appearing to read 'Hiroo Mori'.

Hiroo Mori
Chairman and CEO

For and on behalf of AGC Chemicals Europe Ltd

12th April 2019