

Victrex plc Modern Slavery and Human Trafficking Statement for the Financial Year 2024

As required by the Modern Slavery Act 2015 section 54(1) (the "Act"), this statement outlines the steps that Victrex has taken during the Financial Year ended 30 September 2024 ("FY24") to ensure slavery and human trafficking is not present within our supply chains or our own business. Victrex plc is making this statement on behalf of itself and its group companies which are required to make a statement under the Act, namely Victrex Manufacturing Limited and Invibio Limited. The actions detailed within the statement are being deployed to all Victrex group companies. This statement has been approved by the Board of Directors of Victrex plc and signed by Jakob Sigurdsson, our CEO.

Financial Year 2024

In FY24, we have maintained our efforts to identify and mitigate the risk associated with Modern Slavery. Using a risk-based approach Procurement team have carried out on-site audits with several key strategic suppliers during the year. This statement details our current policies and working practices, how we continue to assess our risk and sets commitments for the coming year.

Our Business and Structure

Victrex is an innovative world leader in high performance materials, serving a diverse range of markets. Every day, millions of people rely on products or applications which contain our thermoplastic polymers, from smartphones, aeroplanes and cars to energy applications and medical devices.

Our headquarters and manufacturing facilities are primarily based in the UK. Our parts manufacturing businesses are based in the US and we have also invested in a new facility in China which came online in 2023, producing first commercial product in 2024. We are a major exporter (we export approximately 98 of our material from the UK), with technical and customer support facilities located across our major markets, serving more than 54 countries. As a global business, we have over 1100 employees in 12 countries across the world. A detailed description of our business model and values can be found in our Annual Report on our website, www.victrexplc.com.

Our Policies, Procedures and Values

Our ethical principles are set in our Global Code of Conduct and underpin the way we do business and treat one another. This Code sets the foundations of how we act personally, with others and in our communities making clear that we do not tolerate modern slavery. As an organisation with an embedded Continuous Improvement philosophy, our approach to these matters is constantly evolving. We regularly review our policies to identify areas for update and improvement. We believe that our continued success as a business rests on maintaining these principles and ensuring we strive to always to "do the right thing".

We have in place a Modern Slavery & Anti-Human Trafficking Policy first adopted in 2016 and which is reviewed annually. The policy details our zero tolerance approach to slavery and human trafficking and emphasises that the prevention, detection and reporting of slavery and human trafficking that may be connected with any part of Victrex's business or supply chains is the responsibility of all those working for Victrex, or under Victrex's control. We monitor legislative

developments in this area. Our Global Whistleblowing Policy is actively monitored and reviewed by the Audit Committee and employees are encouraged to raise any concerns through this process.

Deploying our high standards within the Supply Chain remains of critical importance to Victrex. Our Procurement team follow robust Supplier Approval and Supplier Management processes to ensure that no supplier is used before their own process and approach to Modern Slavery have been assessed and approved. Our Victrex Supplier Standards Handbook (the "Handbook") forms part of our Supplier Approval and Supplier Management processes with a copy being provided to all key raw material suppliers as part of our On-Boarding process. We will continue to cascade this across our wider supply base. The Handbook outlines and expands upon the values core to Victrex and clearly communicates our expectations and it is refreshed periodically. It includes specific prohibitions against the use of forced, bonded or involuntary labour, whether adults or children, and requires suppliers to adhere to slavery and human trafficking laws. We encourage our suppliers to cascade these values through their own supply chains. The principles contained in the Handbook are included in our standard purchasing terms and conditions. We include slavery and human trafficking provisions in all new contracts with our raw material suppliers, as well as requiring adherence to the Handbook.

We understand the correlation between 'conflict minerals' and modern slavery. In ensuring that the Victrex supply chain is free of conflict minerals, our suppliers are expected to supply materials which are 'DRC Conflict Free'. We also have a Conflict Minerals Statement as part of our Global Code of Conduct and our suppliers are expected to have policies, management systems and conduct due diligence to ensure compliance. A copy of our Conflict Minerals Statement is available on www.victrexplc.com

Our People - Recruitment Processes

We have clear procedures in place designed to ensure that we comply with legal requirements in relation to the recruitment of all employees, including national minimum wage, immigration requirements and other national legislative requirements. Whilst the vast majority of our people are employees within the Victrex group, from time to time we use specialist third party services to support our requirements across a number of our professional, strategic and operational areas, either through the engagement of consultants or agency personnel. The agencies we work with are required to demonstrate to us that they have conducted our required preemployment checks.

Supply Chain Overview

Our supply chain is primarily focussed on the sourcing of goods, services and raw materials to support the manufacture of polyaryletherketone (PAEK) polymers, semi-finished and finished products, with 642 finished product SKU's (stock keeping units). We have over 56 strategic suppliers based across 14 countries and a Global Procurement Function, staffed by a professionally qualified procurement team, which is managed from our UK headquarters.

Assessment of Risk

We continue to assess specific geographical or industrial sector risk within our supply chain and factor this into our supplier risk management activities. Supplier performance and risk is monitored and reported through the Integrated Supply Chain monthly review structure and Management Forums. There have been no perceived areas of risk and concern - flagged during the last financial year. We continue to monitor closely any territory or industry which scored highest in our risk

assessment. We also continue to evolve our partnerships with external intelligence providers to form a broad basis for detailed information gathering and analysis, helping us to focus on activity within the wider supply chain.

Due Diligence & Strategic Supplier Management

As part of our pre-qualification procedures, strategic suppliers are required to complete our in-depth Supplier On-Boarding process and, where appropriate, have a subsequent site audit to confirm that they meet our standards. The on-boarding and assessment of critical suppliers underpins our Supplier Management process, allowing us to conduct the appropriate level of due diligence. Specific attention is given to the supplier's policies relating to Corporate Social Responsibility as part of this activity.

Our Supplier Management review process facilitates active and on-going supplier performance management. This cross functional engagement focuses on suppliers of strategic materials and services, implementing a risk-based scorecard approach, regularly evaluated to assess performance based on key criteria, including CSR factors. This also provides the key areas of focus for supplier development activity, which we undertake on a targeted approach to risk for both new and existing suppliers.

Training & Awareness

Training on modern slavery and human trafficking is undertaken by supplier facing personnel. Our Global Code of Conduct training, which is mandatory for all our employees, includes modern slavery and conflict minerals. Additionally training on Modern Slavery is a core part of the professional qualification programme via CIPS (The Chartered Institute of Procurement & Supply) and we continue to invest in the training and education of our Procurement Team as part of professional development.

Measuring Effectiveness

Through our Performance Management review processes, we monitor the performance of our supply base, we have established KPIs to allow us to measure the effectiveness of our rolling risk-based supplier audit and compliance programme. During FY24, no flags on ethical matters (including slavery and human trafficking) have been identified.

Our On-Going Commitment

Victrex remains committed to giving matters relating to Modern Slavery and Human Trafficking the highest level of attention, maintaining standards both internally and with third parties. With our continuous improvement philosophy we will continue to develop, evolve and roll out our policies and procedures to our stakeholder network.

This statement was approved by the Board of Directors on 2 December 2024.

Jakob Sigurdsson

CEO, Victrex plc

This Statement has been approved by the boards of directors for the following companies. They all delegated authority to Jakob Sigurdsson to sign this statement on their behalf.

- Victrex Manufacturing Limited
- Invibio Limited