

VICTREX SUPPLIER

CODE OF CONDUCT

June 2025



The Principles of Conduct

Victrex prides itself on bringing transformational solutions that address world material challenges. Our commitment to innovation and improvement to create value for all, is at the core of our business and demonstrates our commitment to our stakeholders, suppliers, customers, employees and investors.

It is the aim of Victrex to create mutual success with all our stakeholders, built on trust, sustainability and a shared commitment to our codes of conduct.

Whilst the supplier standards of conduct only apply directly to Victrex suppliers, we encourage our suppliers to advise Victrex of any gaps in their own supply chains.

Suppliers to Victrex shall strive to conduct business based on the principles below.

- › Integrity and Ethics
- › Respect of Human Rights
- › Environment Sustainability
- › Health and Safety
- › Management Processes
- › Governance

Integrity & Ethics

Legal Compliance & GDPR

Victrex suppliers will:

- › Act with integrity and honesty across all elements of their business practice.
- › Behave ethically in every aspect of business including, but not limited to, relationships with customers, suppliers and employees.
- › Always act in a manner that does not misrepresent Victrex or the Victrex brand and never make false representations such as untrue or misleading statements in relation to Victrex's products.
- › Operate alongside Victrex in a relationship which promotes transparency, collaboration, respect and trust.
- › Adhere to Victrex core values, and have core values that include a zero tolerance approach to fraud, bribery and corruption, and full respect for competition laws.
- › Victrex suppliers shall operate within all laws and regulations applicable to the country within which they operate. They shall also comply with all international laws applicable to the countries within which they conduct business.
- › Suppliers must comply with all mandatory legal requirements relating to conduct, quality of products, standards of employment, health and safety and environmental sustainability.
- › Suppliers shall take all necessary steps to protect personal data of Victrex, its employees and customers and to prevent improper disclosure, use or processing of such personal data and shall comply at all times with relevant data protection legislation.
- › Victrex prohibits the use of its name, logo, relationships and all other non public information without prior written consent.

Respect of Human Rights

Suppliers must protect their employees from any hostile environment where violation of their human rights may take place, and promote an open communication policy to report any such breach.

Every supplier shall provide fair wages and benefits to its employees that meet or exceed the legal minimum standards in all the countries where Victrex or the supplier operates and ensure terms of contract and payment are made available to them in a language that is understood.

Supplier shall adhere to all applicable laws and regulations regarding employee working hours, including overtime and rest periods and create a work environment free from discrimination and harassment and which does not tolerate any form of discrimination based on race, ethnicity, religion, gender, sexual orientation, age, disability, or any other characteristic protected by law.

Suppliers shall respect the lawful rights of employees to freely associate, join unions, and engage in collective bargaining, and not coerce any individual into forced, bonded or involuntary labour and comply with all international laws and regulations with regard to Modern Slavery and Human Trafficking.

Suppliers shall not employ children (this means any person under the age of 16 or the minimum age as stipulated by local law, whichever is the higher age), and recognise the rights of rights of minorities and Indigenous peoples and respect the land, forest, and water rights of local communities, not support or engage in forced evictions, and only use public or private security services where lawful and reasonable to do so.

Environmental Sustainability

It is the responsibility of all Victrex suppliers to operate with due diligence with regard to environmental impact and sustainability.

Suppliers must be able to provide evidence of a programme of continuous improvement of the impact of their operation on the environment.

Suppliers are encouraged to communicate to all employees and contractors their commitment to improving their environmental impact, emphasising the impact that all employees can make in achieving the improvement targets identified.

Victrex has clear Scope 3 emissions targets aligned to the Science Based Targets Initiatives, which many of our suppliers are also aligned to. Consequently, we are taking steps to integrate sustainability considerations into our procurement processes. We are educating our internal buyers to further increase awareness of environmental impacts and are working to better understand the sustainability practices of our suppliers. This supports our ambition to partner with suppliers who share our commitment to reducing environmental impact across the value chain, where possible.

No conflict minerals, as defined in the Victrex Conflict Minerals Policy Statement, are to be used in the production of any Victrex products.

Suppliers are required to comply with all local and international environmental legislation and permits, and comply with all reporting requirements.

Health & Safety

A Victrex supplier will be committed to the health and safety of all employees, providing a safe working environment with the well being of all employees at the centre of their operation.

Suppliers shall drive a programme of continuous improvement with their health and safety policies.

Employees shall not be forced into conducting unsafe tasks and shall have the right to refuse unsafe working practices and should have a forum at which to raise such concerns.

Suppliers should be able to show that potential emergency or catastrophic situations that would impact either life, environment or operating plants have been identified and that emergency responses have been documented and reviewed on a regular basis.

Suppliers shall provide training regarding the identification of workplace hazards, including hazardous materials. Training shall be provided in a language understood by the employee.

Management Process

Supply Chain

Supplier's management teams will demonstrate a commitment to Victrex core values through policies, procedures and process which ensure continuity of operational compliance and continuous improvement.

Management systems should include:

- › Process control documents and records.
- › The control of production of materials/goods and/or services to Victrex.
- › The effective communication and management of change.
- › A platform to promote effective supplier complaint investigation, internal audit and corrective action resolution.
- › Risk identification, mitigation and control.
- › The resources and infrastructure to ensure compliance to their own internal standards and processes.

Victrex supply chain are responsible for supporting the growth of our customer's businesses. Priority is given to ensuring that our Supply chains are robust and capable of reliably delivering high quality products at a cost which aligns with the value those products bring to our customers. The expectation is that our supply base participate fully with the requirements of our Supplier Management Framework to achieve and maintain their "Approved Supplier Status".

Victrex knows that it is only ever as strong as its supplier base and therefore commits to working together with its suppliers to deliver continuous improvement in their operations.

Victrex expects its suppliers to require the same standards of their suppliers and to make it known to Victrex where there are any gaps in their supply chain with regards to the requirements of this Supplier Code of Conduct.

Governance

Supplier Confidence

Victrex welcomes suppliers who strive to identify areas of non conformance and improvement, and who develop proactive plans for gap closure.

The performance of suppliers against the principles outlined in this Supplier Code of Conduct will form a key part of the Victrex selection processes.

Therefore Victrex will monitor its suppliers for conformance with this policy and expects full transparency and cooperation in allowing this to happen.

Verification of compliance may be conducted in a manner of differing approaches, including but not limited to supplier self evaluation, supplier audits, scorecard rating and target key performance indicators.

Victrex may work together with a supplier with a supplier development approach in order to improve performance. An unwillingness of a supplier to engage in improvement may lead to Victrex making an assessment on whether or not to continue doing business with that supplier.

This Supplier Code of Conduct is sponsored and supported by the Victrex Management team.

Signed
Name... Jakob Sigurdsson
Position.. Victrex CEO

June 2025

