

Victrex plc Modern Slavery and Human Trafficking Statement for the Financial Year 2020

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 2020 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 its group companies which are required to make a statement under the Act, namely Victrex Manufacturing Limited and Invibio Limited. It has been approved by the Board of Directors of Victrex plc and signed by Jakob Sigurdsson, our CEO.

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 (plastics), from smartphones, aeroplanes and cars to oil & gas platforms and medical devices.

Our headquarters and manufacturing facilities are based in the UK and 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 40 countries. As a global business, we have over 800 employees in 16 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.

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 over 2,000 finished product SKU's (stock keeping units). We have over 100 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.

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. We believe that our continued success as a business rests on maintaining these principles and ensuring we strive to always "do the right thing".

We have in place a Modern Slavery & Anti-Human Trafficking Policy first adopted in 2016, which was rolled out globally to all employees. The policy underpins 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. 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 in relation to the matters above, within the Supply Chain remains of critical importance to Victrex. Procurement 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. Throughout the financial year, Procurement have further utilised multi-layered desktop assessments to ensure the appropriate due diligence continues to be undertaken during the global pandemic. Our Victrex Supplier Standards Handbook ('the Handbook') now forms part of our Supplier Approval and Management processes with a copy being provided to all key raw material suppliers as part of our On-Boarding process. We continue to cascade this across our wider supply base. Refreshed and updated with pertinent points of legislation, the Handbook outlines and expands upon the values

core to Victrex and clearly communicates our expectations. 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. In line with compliance to the most stringent standards of quality, we encourage our suppliers to cascade these values through their own supply chains. The principles contained in the Handbook have now been included in our standard terms and conditions as part of our contracts. We include slavery and human trafficking provisions in all new contracts with our raw material suppliers, as well as requiring adherence to the Handbook.

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 Policy as part of our Code of Conduct and our suppliers are expected to have policies, management systems and conduct due diligence to ensure compliance.

Specific attention is given to the assessment of a supplier's policies on conflict minerals and other factors relating to Corporate Social Responsibility as part of our Supplier Approval and On-Boarding activity.

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.

Assessment of Risk

We continue to assess specific geographical or industrial sector risk within our supply chain and factor this into our supplier management activities through both our Business Continuity Risk tracker and our supplier scorecard analysis. Monthly Supplier Management Forums monitor any perceived area of risk and concern - none became apparent 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.

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 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 during the COVID-19 Pandemic. Our Supplier Management Forum facilitates active and on-going supplier management. This cross functional forum focuses on suppliers of strategic materials and services, implementing a risk-based scorecard approach, evaluated monthly to assess performance based on key criteria, including human rights. 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 is on-going across all supplier facing teams to ensure they receive up to date modern slavery and human trafficking awareness training. In addition, we have introduced mandatory

annual awareness training on our Global Code of Conduct for all our employees, which includes modern slavery and conflict minerals.

Measuring Effectiveness

Through our Supplier Management Forum, which monitors our supply base performance, we have established KPIs to allow us to measure the effectiveness of our rolling supplier audit and compliance programme. During the last Financial Year, no flags on ethical matters (including slavery and human trafficking) have been identified.