



**Toray International Europe Group**  
Neu-Isenburg, September 2024

## **Slavery and Human Trafficking Statement** **for the Fiscal Year ending 31 March 2024**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Toray International Europe GmbH, including its subsidiaries, has taken, and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

### **Our business**

#### **Toray International Europe Group (hereafter "TIEU Group")**

Toray International Europe GmbH is located in Neu-Isenburg, Germany and is the parent company of Toray International UK Ltd in London and Toray International Italy srl in Milan. Our main business is related to the purchase and sales of various plastics and chemicals, as well as fibres and textiles.

#### **TORAY Group**

Toray Industries, Inc. is the parent company for the TORAY Group. Toray International Europe GmbH is owned by two Japanese companies - Toray International, Inc. (with 70%), and Toray Industries, Inc. (with 30%). The TORAY Group is currently (as at 31 March 2024) operating in approximately 30 countries worldwide; there are 306 subsidiaries/affiliates; with 48,140 employees belonging to the TORAY Group.

### **Our supply chain**

As a group of trading companies, TIEU Group operates at the end of the supply chain within the buy and sell process.

The research/planning and production process is the responsibility of Toray Industries, Inc. and other TORAY manufacturing companies. On the supply side, TIEU Group buys most of its products from Toray companies (over 90%). The customers are mainly located in Europe.

### **Our policies in relation to slavery and human trafficking**

#### **A. TORAY Philosophy**

The TORAY Group's corporate philosophy aims to "contribute to society through the creation of new value with innovative ideas, technologies and products". Under this philosophy TORAY places emphasis on its social responsibility to act fairly while maintaining high ethical standards.

#### **B. TORAY Group CSR Policy**

As part of the TORAY Group, we are following the "TORAY Group's Corporate Social Responsibility (CSR)" Guidelines. The CSR guidelines are integrated into the management philosophy and long-term corporate vision and are adhered to by All TORAY Group companies. Further details on the CSR guidelines and the annual CSR Activity Report are available here:

<https://www.toray.com/global/sustainability/stance/>

CSR initiatives are increasingly important in addressing a diverse range of challenges facing society in the modern day, including climate change, environmental protection, respect for human rights and improvements in the workplace. These initiatives can no longer focus solely on a single company and are being extended to encompass its entire supply chain. To address this issue, TORAY Group has established the TORAY Group CSR Procurement Policies. The policies were revised in March 2022 and at the same time TORAY Group established the new CSR Procurement guidelines as well as Purchase and Distribution Policies:

[https://www.toray.com/global/sustainability/activity/supply\\_chain/](https://www.toray.com/global/sustainability/activity/supply_chain/)

### **C. TORAY Group Ethics & Compliance Code of Conduct**

Further efforts on the establishment of a corporate culture of respect for corporate ethics are stated in the TORAY Group “Corporate Ethics and Legal Compliance Code of Conduct”. The code of conduct is available on the TORAY website at:

<https://www.toray.com/sustainability/activity/compliance/culture.html> The Code of Conduct was reviewed and revised in June 2023, re-emphasizing the importance of fairness and equality in the workplace.

Furthermore, the policy and framework related to human rights is available here:

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

In response to the growing importance of social responsibility and awareness, the TIEU Group established its own guidelines: “Corporate Ethics and Legal Compliance Handbook”. It contains the TIEU Group principles on CSR, the code of conduct, and guidelines covering areas such as relationships with business partners, human rights and employment regulations.

#### **Due diligence processes**

Our business partners are checked carefully before starting a new business. On the supply side, the TIEU Group can minimise the risk of any involvement of modern slavery since we are buying from a global network of TORAY Group companies.

For external business partners, there is checking of company data, websites and certificates, conducting regular company visits, or checking existing terror and sanctions lists.

Toray Industries, Inc. sends CSR procurement questionnaires to major suppliers every two years. In fiscal year 2022 448 companies responded to this request, with 99% of the companies confirming they had achieved the required CSR compliance level. In fiscal year 2023, six responders that failed to meet Toray’s required CSR compliance level in the 2022 survey were further investigated. Conditions on the ground were verified and improvement measures discussed. As a result a variety of improvements were implemented, including “formulation of internal rules on ethics and compliance and incorporation of these rules in employment regulations” and “implementation of in-house training on human rights and labour issues”. Over the course of fiscal years 2022 and 2023, major suppliers (502 in total) have been presented with the Toray Group CSR Procurement Guidelines, requesting their understanding of and compliance with these guidelines. By the end of March 2023 379 suppliers had signed letters of consent with regards to these guidelines, further strengthening CSR promotion throughout the supply chain. Toray’s affiliated companies

outside Japan also ask their major suppliers to promote CSR initiatives. Toray Industries, Inc. supported these requests by sending out CSR procurement questionnaires to its affiliates' suppliers. In fiscal year 2022, 80 affiliated overseas companies (including TIEU Group) presented 2,212 major suppliers with the Toray Group CSR Procurement Guidelines, followed by a further 129 suppliers in fiscal year 2023. Suppliers were requested to confirm their understanding of and compliance with these guidelines by signing letters of consent.

To ensure socially responsible procurement across the TORAY Group and address today's increasingly globalised procurement risks, Toray Industries, Inc. established a working group to lead a group-wide risk management initiative. The working group strives to ascertain the status of CSR practices at suppliers, responds to customer inquiries about Toray Industries, Inc.'s CSR practices, and supports group companies in this area.

### **Risk assessment and management**

The TORAY Group believes risk management is a fundamental element of corporate management and periodically identifies potential management risks to mitigate and prevent risks from materialising.

The Toray Group Risk Management Committee is tasked with discussing and promoting shared awareness of risk management across the entire TORAY Group. The Overseas Crisis Management Committee and local crisis management committees have also been made subordinate to the Risk Management Committee.

Furthermore, the TORAY Group Whistle-blowing System serves to detect any serious misconduct. Helpline contact points are in place at each company to report to Headquarters and support possible investigation requests.

Based on education materials provided by Toray Industries, Inc., TIEU Group implemented a new whistleblowing policy in March 2023. This policy is intended to support employees, managers and business partners in recognising, reporting and eliminating misconduct. Acts of misconduct are defined within TORAY's internal policies and guidelines, and are to be observed in addition to violations of any national or EU laws. Furthermore, it clearly defines the reporting procedures and channels, stipulating the right to report.

### **Key performance indicators to measure effectiveness of steps being taken**

The number of messages, news or reports is a measure of the effectiveness of our efforts to ensure that modern slavery and human trafficking is not taking place.

No messages or reports of such problems were received within the TIEU Group in fiscal year 2023.

### **Training on modern slavery and trafficking**

The TORAY Group has established online training courses covering corporate ethics for all employees as well as annual surveys on activities promoting human rights.

In addition to the evaluation of such annual surveys, employees were trained on the new initiative "Mission B.E.A.R." to identify compliance risks. The principles related to the new initiative are available here:

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

In TIEU Group the Mission BEAR initiatives and actions plans are actively promoted in the yearly Compliance Month.

## **Future Perspective**

### CSR Road Map

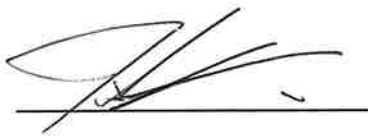
Corporate Social Responsibility has been integrated into TORAY Group management strategies, making it a top priority. TORAY Group's eighth medium term CSR Road Map 2025 (FY2023 ~ FY2025) was published in June 2023, outlining future initiatives in areas such as corporate ethics and legal compliance, human rights and human resources development. Further details are available here:

<https://www.toray.com/global/sustainability/stance/roadmap.html>

A new CSR roadmap will be published in fiscal 2023.

This statement was approved by the Board of Directors on 27 September 2024 and signed by an authorised representative as indicated below.

For and on behalf of the Toray International Europe Group



30 September 2024

Tatsu Matsushita  
Managing Director

Toray International Europe GmbH  
Toray International UK Ltd  
Toray International Italy srl