



Toray International Europe Group
Neu-Isenburg, September 2021

Slavery and Human Trafficking Statement **for the Fiscal Year ending 31 March 2021**

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 2021) operating in 29 countries worldwide; there are 283 subsidiaries/affiliates; with 46,267 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 supplier 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

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

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. All TORAY Group companies are obliged to follow the guidelines. Further details on the CSR guidelines and the annual CSR Activity Report are available here:

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

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>

Further to this, 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 supplier 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.

In the fiscal year ending 31 March 2021, the TORAY Group analysed the responses of suppliers to its CSR survey, requesting improvements as necessary. TORAY Group also followed up on the progress made on socially responsible procurement by TORAY Group companies outside Japan. 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.

The impact of the COVID-19 pandemic has spread worldwide, and Toray Group is working to prevent its employees from becoming infected. At the same time, it is striving to ascertain and prevent employment problems that may occur due to demand fluctuations, including in the supply chain.

Toray Group established a group-wide pandemic task force in February 2020. The task force takes measures to prevent the spread of infection by monitoring the health status of employees worldwide. It also collected pandemic-related information concerning the countries and regions where group sites are located and implemented proactive measures to prevent infection. Toray Group also worked to ascertain and prevent any potential human rights issues within the supply chain. The CSR procurement survey conducted in fiscal 2020 included questions such as employment and labour issues that could have arisen due to the pandemic's impact on suppliers, and whether appropriate measures had been taken in response.

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 the fiscal year.

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 human rights promotion activities.

In addition to the evaluation of such annual surveys, the 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/>

Future Perspective

CSR Road Map

At the TORAY Group CSR has been integrated into management strategies. Social responsibility is therefore a top priority for TORAY Group management. TORAY Group's Sixth CSR Road Map 2022 (FY2020 ~ FY2022) carries out 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/pdf/csrroadmap_2022.pdf

This statement was approved by the Board of Directors on 30 September 2021 and signed by an authorised representative as indicated below.

For and on behalf of the Toray International Europe Group



Kazumine Torigoe
Managing Director

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

30 September 2021