HR&GA Department

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Tokyo Chemical Industry

Modern slavery statement for financial year ending 31st December 2016

Background

This statement has been prepared for the purposes of UK Modern Slavery Act 2015 ("the Act").

References in the statement to "modern slavery" mean any conduct which is an offence under Part I of the Act including slavery, servitude, any type of forced or compulsory labour and human trafficking for the purposes of exploitation.

This is a statement published by Tokyo Chemical Industry Co. Ltd (Japan) ("TCI"), the parent company, in respect of itself and all of its subsidiaries (including, Tokyo Chemical UK Limited) within the TCI group ("the Group").

Even though TCI UK Limited is not required (based on its current turnover) to produce a modern slavery statement under the Act, TCI has chosen to produce a group statement, covering all Group subsidiaries, given its commitment to ensuring the protection of human rights in its business and operations.

The issue of modern slavery

According to the International Labour Organisation, there are some 21 million people worldwide subjected to modern slavery. We do not tolerate modern slavery either within our business itself or within our supply chain. We expect our supply chain (whether direct suppliers or those that directly or indirectly supply our direct suppliers) to share the same values.

TCI's structure, business and supply chains

TCI is a global leading manufacturer and supplier of organic laboratory chemicals for academic/industrial research and development activities in the chemical sector. TCI is the parent company of the Group. The Group has over 800 employees worldwide and operates in eight countries.

The Group consists of the following entities:

- Tokyo Chemical Industry,
- TCI America,
- TCI Europe N.V.,
- TCI Deutschland GmbH,
- Tokyo Chemical Industry UK Ltd.,
- TCI (Shanghai) Development Co., Ltd.,



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TCI Chemicals (India) Pvt. Ltd.

The Group currently operates in the following regions: Japan and Europe (including in the following areas Germany, the United Kingdom, Belgium and France).

Our supply chains are broad and geographically varied. We procure a range of goods and services from a variety of suppliers in connection with our business activities including chemical raw materials which are mainly located in Japan, China, India, Europe and the US.

Relevant policies

We are committed to ensuring ethical business practices across our business and to acting as a responsible member of society in all of our business endeavours.

TCI has a code of conduct ("the Code of Conduct") which sets out its core business values, including, sound business practices, global consciousness, respect for human rights and providing a safe and convenient workplace. The Code of Conduct applies to all TCI individuals and to business processes globally.

In addition, TCI has a Whistleblowing Policy and a global "helpline" which is in place for all employees and staff to raise concerns and report instances of potential non-compliance with our values and principles, in full confidence and without fear of retaliation.

Due diligence in respect of modern slavery and human trafficking

We have reviewed our business and our supply chain. Neither we nor, to the best of our knowledge, our supply chain make use of modern slavery.

We have taken the following steps to assess and manage any risk that our supply chain may use modern slavery:

- We expect our suppliers to take a zero tolerance approach to slavery and human trafficking and to place similar expectations on their respective suppliers.
- When entering into arrangements with suppliers, suppliers undergo a supplier approval process in
 which we assess them from a qualitative and economic perspective. As part of that assessment, we
 are alert for any indicators of modern slavery.
- We may impose contractual obligations on suppliers under which they:
 - o undertake to comply with the principles in the Code of Conduct;
 - warrant that their business and, to the best of their knowledge, their own supply chain do not use modern slavery;



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- agree to provide us on request with responses to a self-assessment questionnaire regarding use of modern slavery and steps they have taken to ensure it is not used by them or their supply chain.
- agree to permit us and third parties acting for us to inspect their facilities, records and practices, to have access to their personnel and to audit their business for the purposes of ensuring that they comply with these obligations and that there is no use of modern slavery.
- o impose equivalent obligations on their own suppliers.
- Where possible, we aim to review statements published by certain suppliers on use of modern slavery to ensure that they in turn are taking what appears to us to be appropriate steps.

Training

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, we provide training to relevant members of staff. This training is included in TCI Global Training program.

Effectiveness in combatting modern slavery

We will continue to review our policies, processes and training going forwards to make sure these support and further our commitment to combatting the risks of modern slavery in our business and our supply chains.

Date 19th August 2023

Naoyuki Asakawa

President & CEO,

Tokyo Chemical Industry Co., Ltd.