

SUMCO EUROPE SALES PLC

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Modern slavery and human trafficking policy

The Company is committed to driving out acts of modern-day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and partners.

The Company acknowledges a responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. These, as well as the suppliers of services, make up the supply chain within the organisation.

As part of the Company's due diligence processes into slavery and human trafficking, the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues.

The level of management control required for these sources will be continually monitored.

The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

The Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request.

DocuSigned by:

Jim Swantko

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Jim Swantko

President

Sumco Europe Sales Plc