

ANTI-HUMAN TRAFFICKING POLICY

The purpose of this policy is to provide a clear and precise framework for combating human trafficking within Tosoh Europe.

Tosoh is committed to respecting and promoting fundamental human rights, and to eradicating all forms of human trafficking in its supply chain and operations.

Trafficking in human beings is defined as the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

This policy complies with the following legislation:

European Union: Directive 2011/36/EU on preventing and combating trafficking in human beings, and protecting its victims.

United Kingdom: Modern Slavery Act 2015.

OUR COMMITMENT

Tosoh Europe undertakes to :

- **Prohibit all forms of human trafficking and modern slavery** within its operations and supply chain.
- **Ensure freedom of workers to terminate employment** at their own will and with reasonable notice, without penalties or restrictions, in accordance with applicable labor laws.
- **Guarantee freedom of movement**, meaning that workers shall not be physically confined or restricted in their ability to leave the workplace or accommodation provided, and they shall retain full control of their personal identification and travel documents.
- **Respect freedom of association and collective bargaining**, ensuring that workers may join trade unions and engage in lawful collective negotiations without fear of retaliation.
- **Prohibit any threat of violence, harassment or intimidation** against workers, whether physical, psychological or verbal, fostering a safe and respectful working environment.
- **Prohibit the use of worker-paid recruitment fees**, directly or indirectly. All recruitment-related costs must be borne by the employer, including travel, documentation and agency fees.
- **Ban compulsory overtime**, ensuring that all overtime is voluntary, based on mutual agreement, and compensated in line with legal or collective standards.
- **Prohibit child labor**, ensuring that no person under the minimum legal working age or under 15 years (whichever is higher) is employed in any capacity, and that young workers are protected from hazardous or night work.

- **Prohibit discrimination** in hiring, remuneration, promotion, access to training, or termination, on the basis of race, color, gender, age, religion, political opinion, national origin, sexual orientation, disability, or any other status protected by law.
- **Prohibit the confiscation of original identification documents**, such as passports or work permits. These documents must remain in the possession of the workers at all times.
- **Provide access to remedy, compensation and justice** for any victims of trafficking or modern slavery, including referral to support services, legal assistance, and, where possible, financial or moral compensation.
- Implement verification and due diligence procedures to ensure that human trafficking does not exist within our supply chain.
- Train its employees on the risks of human trafficking and how to prevent and detect it.
- Provide confidential reporting mechanisms for employees and third parties to report suspected human trafficking.
- Cooperate fully with the competent authorities in the investigation and prosecution of human trafficking.

DUE DILIGENCE

Tosoh is committed to implementing and strengthening due diligence measures which include:

- Assessing the risks of human trafficking in our operations and supply chain.
- Regular audits of our suppliers and business partners to verify compliance with anti-human trafficking standards.
- Contractual clauses obliging our suppliers to comply with laws against human trafficking and to take measures to prevent it.

REPORTING AND WHISTLEBLOWER PROTECTION

Tosoh provides anonymous and secure reporting channels to

- enable our employees and other stakeholders to report any suspected human trafficking activity without fear of reprisal.
- guarantee a thorough and confidential investigation into all reports of human trafficking.

Access to the whistleblowing line :

