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AGC CHEMICALS EUROPE, LTD.

S54: Annual Statement on Slavery and Human Trafficking

AGC Chemicals Europe Ltd (AGCCE Ltd), based in Thornton Cleveleys in the United Kingdom, is part of the AGC Group of companies, specifically the AGC Chemicals division.

AGCCE Ltd manufacture and sell fluoropolymers to make highly durable plastics and coatings, resistant to corrosion and extremes of temperature.

The AGC Group is owned and run from locations in Japan, with manufacturing and sales locations within all 5 continents.

AGCCE Ltd is an independent operator responsible for its own supply chains and distribution networks. We have suppliers of Raw Materials, Packaging and Engineering spares as well as contracted service providers. The supply chain is primarily based in the United Kingdom and the rest of Europe. A number of key raw material products are provided by our parent in Japan.

The AGC Code of Conduct (“Code”) is the reflection of our Shared Value “INTEGRITY” in the AGC Group vision. It sets forth the requirements for all AGC Group companies and their employees to assure that their business conduct is consistent with laws, company policies/rules and business ethics. Our Code applies to all AGC Group businesses and their employees, directors and officers.

The AGC Chemicals approach to Corporate Social Responsibility (CSR) focusses on five areas which includes People and Community, including slavery and human trafficking. Article Five of the Code specifically states that: “We do not use Child Labour or forced labour in any of our global operations or facilities. We fully respect all applicable laws which are related to the rights of workers.”

AGC Chemicals Europe Ltd disseminates training on all CSR and Business Conduct issues to all employees upon their induction to AGCCE and provide annual refresher training, including slavery and human trafficking, to all employees. A European Regional Compliance Committee has been established under the Global Compliance Leader and confidential reporting routes are available and briefed to employees if they believe that these rules have been broken.

Article Five further states that: “We expect that all companies with which we do business will confirm to all applicable laws in these regards”. This means that all new suppliers and providers of contracted services to AGC Chemicals Europe Ltd are approved using pre-defined qualification documents. All existing suppliers are monitored and assessed regularly. Both processes use toolsets

that have a specific focus on CSR factors and have recently been adapted to include more specific details on modern slavery. A particular focus moving forward will be on companies that provide a service to AGC Chemicals Europe Ltd, where people are a key resource, for example transportation and logistics providers and maintenance contractors.

This statement has been approved by the AGCCE Ltd Board of Directors and will reviewed on an annual basis.



Kazunobu Kawahara

Managing Director

For and on behalf of AGC Chemicals Europe Ltd

26th January 2017