

1 Purpose

Photronics Leadership Ltd (trading at Photronics Leadership Group, PLG) is committed to conducting business ethically and with integrity. This policy sets out the PLG's approach to preventing modern slavery, human trafficking, forced labour and exploitation in its operations and supply chains.

This policy is designed to support responsible business practices and reflect the principles of the Modern Slavery Act 2015. It is not contractual and may be amended from time to time.

2 Scope

This policy applies to all PLG employees, directors, workers, contractors, consultants, agency staff and anyone acting on behalf of the PLG.

It also applies to PLG's relationships with suppliers, subcontractors, service providers and other business partners. The PLG expects those it works with to share its commitment to preventing modern slavery and human trafficking.

3 Policy Statement

- The PLG has a zero-tolerance approach to modern slavery, human trafficking, forced labour and exploitation.
- The PLG will not knowingly work with any organisation or individual involved in modern slavery or human trafficking.
- The PLG will take reasonable steps to identify and reduce modern slavery risks in its business and supply chains.
- The PLG expects suppliers and business partners to comply with all applicable employment, labour, human rights and anti-slavery laws.
- The PLG will encourage staff to report concerns and will handle reports seriously, confidentially and without victimisation.

4 What Modern Slavery Means

Modern slavery is an umbrella term covering serious forms of exploitation. It can include slavery, servitude, forced or compulsory labour, human trafficking, debt bondage, child labour and situations where people are controlled, threatened, coerced or deceived for the purpose of exploitation.

Modern slavery can occur in any country or sector. Risks may be higher where labour is low-paid, temporary, outsourced, migrant, seasonal, informal or supplied through multiple layers of subcontracting.

5 Risk Areas

The PLG will consider modern slavery risks as part of its day-to-day business activities. Potential risk areas may include:

- Use of labour providers, contractors, consultants or agency workers.
- Suppliers that rely on low-paid, temporary, migrant or outsourced labour.
- Cleaning, facilities, logistics, warehousing, construction, hospitality, manufacturing or similar services.
- Suppliers based in countries or sectors known to have higher labour exploitation risks.

- Unusually low pricing, cash-based arrangements, limited transparency or reluctance to provide information.

6 Supplier and Business Partner Standards

The PLG expects suppliers and business partners to operate ethically and to take reasonable steps to prevent modern slavery in their own operations and supply chains.

- Comply with all applicable laws relating to employment, labour standards, immigration, health and safety, human rights and anti-slavery.
- Ensure workers are free to choose employment and leave work in accordance with legal and contractual rights.
- Pay workers lawfully and provide clear terms of engagement.
- Not use forced, compulsory, bonded, trafficked or child labour.
- Maintain appropriate records and provide reasonable information where requested by the PLG.
- Notify the PLG promptly of any actual or suspected modern slavery issue connected to goods or services supplied to the PLG.

7 Due Diligence

The PLG will take proportionate steps to assess and manage modern slavery risks when engaging suppliers and business partners. The level of due diligence will depend on the nature of the goods or services, the location of the supplier, the value of the contract and the potential risk level.

Due diligence may include supplier questionnaires, checks on policies and procedures, contractual commitments, review of recruitment practices, requests for information, site visits where appropriate, or additional checks for higher-risk suppliers.

8 Recruitment and Employment Practices

The PLG will recruit and engage people lawfully, fairly and transparently. Workers should receive clear information about their role, pay, working hours and terms before starting work.

The PLG will not charge workers recruitment fees, withhold identity documents, require workers to lodge deposits, or knowingly allow practices that restrict a person's freedom to leave work or end their engagement lawfully.

9 Reporting Concerns

Anyone who has concerns about actual or suspected modern slavery connected to the PLG, its suppliers or business partners should report them promptly to [insert contact name/role/email].

Concerns may also be raised through the PLG's whistleblowing procedure, where one exists, to the PLG board or to the elected PLG Chair or Vice-Chair. If there is an immediate risk of harm or danger, the matter should be reported to the emergency services or an appropriate authority.

10 Response to Concerns

The PLG will take reports of modern slavery seriously and will consider appropriate steps to investigate and respond. This may include gathering information, speaking to relevant people, contacting a supplier, pausing work, seeking advice or reporting the matter to an appropriate authority.

The PLG will aim to act in a way that protects potential victims and avoids causing further harm. Decisions about terminating a supplier relationship will be considered carefully, particularly where immediate termination could increase risk to affected workers.

11 Protection for Those Raising Concerns

The PLG encourages openness and will support anyone who raises a genuine concern under this policy, even if the concern later turns out to be mistaken.

The PLG will not tolerate victimisation, retaliation or detrimental treatment of anyone who raises a concern in good faith or assists with an investigation.

- Employees should report concerns promptly and cooperate with any reasonable investigation.
- Managers should take concerns seriously, keep an open mind and escalate issues appropriately.
- The PLG will consider what action is needed to protect individuals, address risks and prevent recurrence.

12 Training and Awareness

The PLG will provide appropriate information or training to relevant employees so they understand modern slavery risks, warning signs, reporting routes and their responsibilities under this policy.

Training and awareness may be proportionate to the role. Employees involved in procurement, recruitment, supplier management or site operations may need more detailed guidance.

13 Records and Monitoring

The PLG will keep appropriate records of supplier checks, concerns raised, investigations, decisions and actions taken under this policy.

The PLG may review supplier relationships, contract terms, procurement processes and internal controls to monitor the effectiveness of this policy and identify improvements.

Where The PLG identifies higher-risk suppliers or activities, it may introduce additional checks, monitoring or contractual requirements.

14 Modern Slavery Statement

Under section 54 of the Modern Slavery Act 2015, certain UK commercial organisations must publish an annual modern slavery statement if they meet the legal criteria, including the turnover threshold. The PLG will assess whether this requirement applies to it and will publish a statement if required by law.

Even where The PLG is not legally required to publish a statement, it may choose to provide information to customers, suppliers, tendering organisations or other stakeholders about the steps it takes to prevent modern slavery.

15 Breaches of This Policy

Any employee who breaches this policy may be subject to disciplinary action, which could include dismissal in serious cases. The PLG may also terminate relationships with suppliers or business partners who fail to meet expected standards or address modern slavery risks appropriately.

16 Responsibilities

- **Employees** are responsible for acting ethically, following this policy and reporting concerns promptly.
- **Managers** are responsible for promoting awareness, responding to concerns and escalating risks appropriately.
- **The PLG** is responsible for maintaining appropriate controls, reviewing supplier risks and taking reasonable steps to prevent modern slavery in its operations and supply chains.

17 Policy Review

This policy will be reviewed periodically and updated where necessary to reflect changes in law, guidance, supplier risk or The PLG's business needs.

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