



Toray International Europe Group
Neu-Isenburg, September 2019

Slavery and Human Trafficking Statement **for the Fiscal Year ending 31 March 2019**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Toray International Europe GmbH, including its subsidiaries, has taken, and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Our business

Toray International Europe Group (hereafter "TIEU Group")

Toray International Europe GmbH is located in Neu-Isenburg (Germany) and is the parent company of Toray International UK Ltd in London and Toray International Italy srl in Milan. Our main business is related to the purchase and sales of various plastics and chemicals, as well as fibres and textiles.

TORAY Group

Toray Industries, Inc. is the parent company for the TORAY Group. Toray International Europe GmbH is owned by two Japanese companies - Toray International, Inc. (with 70%), and Toray Industries, Inc. (with 30%). The TORAY Group is currently (as at 31 March 2019) operating in 26 countries worldwide; there are 275 subsidiaries/affiliates; with about 48,000 employees belonging to the TORAY Group.

Our supply chain

As a group of trading companies, TIEU Group operates at the end of the supply chain within the buy and sell process.

The research/planning and production process is the responsibility of Toray Industries, Inc. and other TORAY manufacturing companies. On the supplier side, Toray International Europe GmbH buys most of its products from Toray companies (over 90%). The customers are mainly located in Europe.

Our policies in relation to slavery and human trafficking

The TORAY Group philosophy aims at "the contribution to society through the creation of new value with innovative ideas, technologies and products". Under this philosophy TORAY places emphasis on its social responsibility and acting fairly while maintaining high ethical standards.

As part of the TORAY Group, we are following the "TORAY Group's Corporate Social Responsibility (CSR)" Guidelines. The CSR guidelines are integrated into the management philosophy and long-term corporate vision. All TORAY Group companies are obliged to follow the guidelines. More details on CSR can be found on the TORAY website at:

<http://www.toray.com/csr/index.html>

An annual CSR report is published which sets out CSR activities, social issues, CSR targets and performance results in the fiscal year. It is available on the TORAY website at:
<http://www.toray.com/csr/download/index.html>

Further efforts on the establishment of a corporate culture of respect for corporate ethics are stated in the TORAY Group “Corporate Ethics and Legal Compliance Code of Conduct”. The code of conduct is available on the TORAY website at:
<http://www.toray.com/csr/activity/compliance/culture.html>

Further to this, Policy and Framework related to Human rights is available here:
<https://www.toray.com/csr/activity/personnel/>

Since social responsibility and awareness is becoming increasingly important, the TIEU Group established its own guidelines: “Corporate Ethics and Legal Compliance Handbook”, in October 2016. It contains the TIEU Group principles on CSR and the code of conduct, and guidelines e.g. on relationships with business partners, on human rights and employment regulations.

Due diligence processes

Our business partners are checked carefully before starting a new business. On the supplier side, the TIEU Group can minimise the risk of any involvement of modern slavery since we are buying from a global network of TORAY Group companies.

For external business partners, there is checking of company data, websites and certificates, conducting regular company visits, or checking existing terror and sanctions lists.

In the fiscal year ending 31 March 2018, the TORAY Group analysed the responses of suppliers to its CSR survey and created an evaluation sheet for each supplier. TORAY Group also followed up on the progress made on socially responsible procurement by TORAY Group companies outside Japan.

Risk assessment and management

The TORAY Group believes risk management is a fundamental element of corporate management and periodically identifies potential management risks to mitigate and prevent risks from materialising.

In May 2018, TORAY Group established the group-wide Risk Management Committee tasking it with discussing and promoting shared awareness of risk management across the entire TORAY Group. The Overseas Crisis Management Committee and local crisis management committees have also been made subordinate to the Risk Management Committee. Furthermore, the TORAY Group employs Crisis Management Regulations that set procedures for establishing a Company-Wide Emergency Quick Response System in the event of a major emergency to mitigate damage and rapidly secure business continuity.

Key performance indicators to measure effectiveness of steps being taken

The number of messages, news or reports is a measure of the effectiveness of our efforts to ensure that modern slavery and human trafficking is not taking place.

No messages or reports of such problems were received within the TIEU Group in the fiscal year.

Training on modern slavery and trafficking

The TORAY Group has established online training courses covering corporate ethics for all employees. In May 2019, a seminar on compliance was offered to all employees of TIEU Group.

Such training should improve the awareness of modern slavery and human trafficking.

CSR Road Map

At the TORAY Group CSR has been integrated into management strategies. Social responsibility is therefore a top priority for TORAY Group management. TORAY Group's Sixth CSR Road Map (2017-2019) carries out future initiatives in areas such as corporate ethics and legal compliance, human rights and human resources development.

For and on behalf of the Toray International Europe Group



Koji Sasaki
Managing Director

27 September 2019

Toray International Europe GmbH
Toray International UK Ltd
Toray International Italy srl