



SEKISUI CHEMICAL Group UK Modern Slavery Statement for Financial Year (FY) 2025

The following statement is a report for FY2025 corresponding to the account closing date of March 31, 2026. It also includes plans for initiatives in FY2026 and beyond.

1. About this statement

SEKISUI CHEMICAL Co., Ltd. (hereafter referred to as the “Company”) makes this statement pursuant to section 54 (1) of the UK Modern Slavery Act 2015 (hereafter referred to as the “Slavery Act”). It sets out the actions taken by SEKISUI CHEMICAL Group, which is a corporate conglomerate managed by the Company as the parent company, to prevent any forms of modern slavery and human trafficking in any part of its business or its supply chains. The Company hereby declares that it remains fully committed to opposing slavery and human trafficking in any part of its business or its supply chains. The concepts of slavery and human trafficking used in this statement are as defined in the Slavery Act.

2. Outlines of our business and structure

Since its establishment in 1947, SEKISUI CHEMICAL Group has continued to open up new frontiers of “residential and social infrastructure creation” and “chemical solutions”, utilizing its prominent technology and quality, thereby contributing to enriching people’s lives and the social infrastructure. In 2001, we adopted the Divisional Company Organization System, which consists of three Divisional Companies and Headquarters. SEKISUI CHEMICAL Group’s products are sold around the world. The Group, which has its head office in Japan, has 155 Group companies (excluding equity-method affiliates and affiliates) in 20 countries and regions. It has 26,752 employees and consolidated sales of JPY 1.3093 trillion.

(1) Company and main businesses

1) Housing Company

Major lines of business: New construction, refurbishing, residential, housing life, overseas business

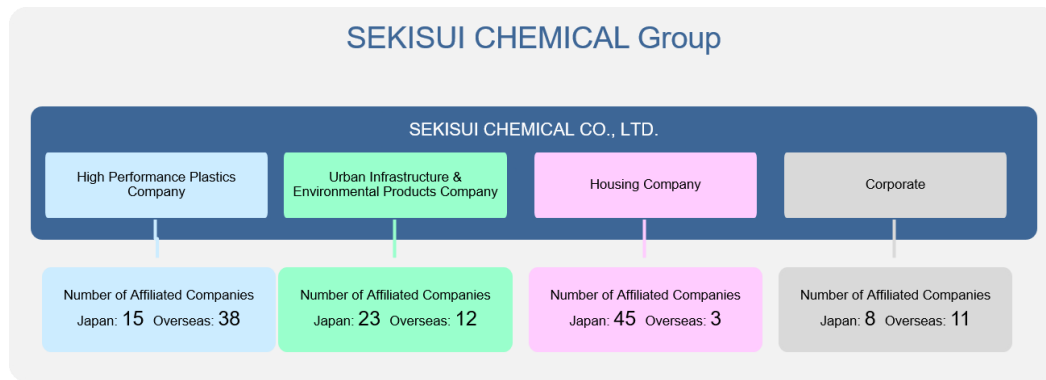
2) Urban Infrastructure & Environmental Products Company

Major lines of business: Pipe systems, Buildings and Infrastructure Composite Materials, Infrastructure Renovation

3) High Performance Plastics Company

Major lines of business: Electronics, Mobility, Industrial

4) Headquarters: Medical and other businesses



(2) Business in the UK

In the UK, SEKISUI DIAGNOSTICS (UK) LIMITED, a SEKISUI CHEMICAL Group, conducts business operations.

Major lines of business: Development, manufacture, and sales of test drugs and raw materials (enzymes) (delete the text about SA)

3. Outline of our supply chains

We source raw materials from suppliers across the world based on our Basic Procurement Policy. In FY2024, we revised our Basic Procurement Policy in order to respond to further escalation of social demands in recent years, including human rights, sustainability, and anti-corruption. Calling on our suppliers to fulfil their responsibilities to respect human rights, we have posted information on the Company's website to widely publicize details on revision.

In addition, we summarize lists of items as standards which we request all suppliers involved with the Group and production of the Group's products to comply with, as the "SEKISUI CHEMICAL Group Sustainable Procurement Guidelines (Supplier Code of Conduct)". Sustainable Procurement Guidelines are in line with the UN Global Compact 10 Principles, UN Guiding Principles on Business and Human Rights, and SEKISUI CHEMICAL Human Rights Policy, and serve as the criteria that must be observed by all business partners involved with the Group and the production of its products. We ask our business partners to understand and comply with the purpose and content of these guidelines as well as cooperate with us in our efforts to realize a sustainable society.

* Sustainability Report 2026 (p.135):

• [Society > Responsible Procurement > Basic Procurement Policy](#)

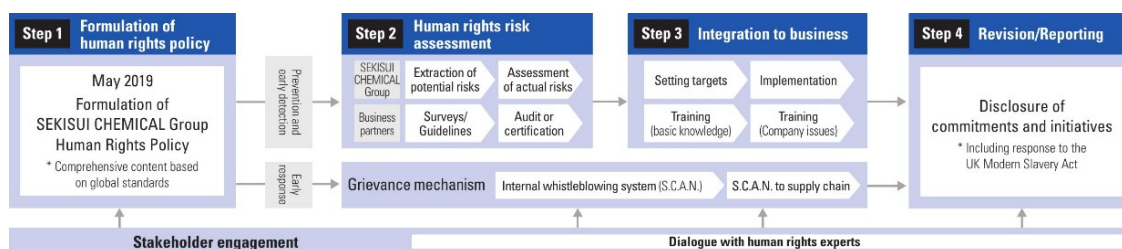
• [Society > Responsible Procurement > Sustainable Procurement Guidelines \(Supplier Code of Conduct\)](#)

4. Overview of SEKISUI CHEMICAL Group's Human Rights Initiatives

(1) Organizing our Human Rights Initiatives

SEKISUI CHEMICAL Group has organized human rights initiatives involving the Group based on the UN's Guiding Principles on Business and Human Rights in the following manner. Grounded in the SEKISUI CHEMICAL Group Human Rights Policy formulated in May 2019, we will work to build a cycle to evaluate human rights impacts, integrate human rights into business, make reports, and establish a grievance mechanism in an effort to identify, address, and remediate any human rights risks that may arise from the Group's business activities.

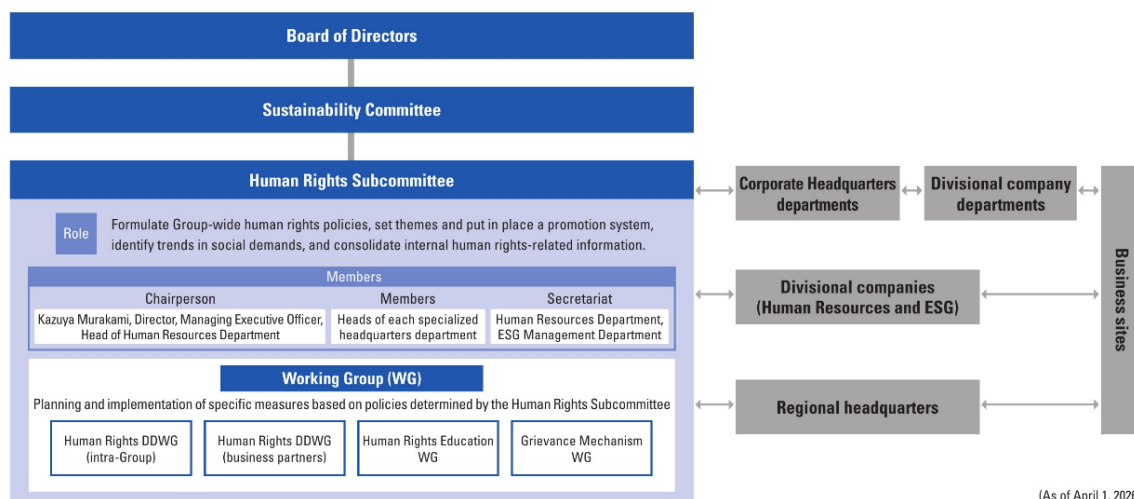
Overview of SEKISUI CHEMICAL Group Human Rights Initiatives



(2) System to Enhance Initiatives

To strengthen our response to a wide-ranging array of human rights issues, including identification, evaluation and remediation of human rights risks, education and training, and establishment of grievance mechanisms, in a cross-organizational manner, we established the Human Rights Subcommittee under the Sustainability Committee in FY2022.

From FY2024, the new Human Rights Section Meeting was launched as the seventh subcommittee under the umbrella of the Sustainability Committee, and the Human Rights Subcommittee was reorganized as the Human Rights Promotion Subcommittee, a wing of the Human Rights Section Meeting. Chaired by the Executive Officer and Head of Human Resources Department, the Human Rights Section Meeting is comprised of the heads of each specialized Headquarters department, and assumes the role of formulating Group-wide policies regarding human rights. At the same time, four working groups linked to the Human Rights Promotion Subcommittee plan and execute concrete measures. Likewise, we promote our human rights initiatives throughout the Group by sharing the policies and measures established by the Human Rights Section Meeting and each working group among each of the relevant departments of the Company's headquarters and divisional companies, and by applying these down to the business site level. In FY2025, the Human Rights Section Meeting was held once and the Human Rights Promotion Subcommittee meeting was held six times.



5. Policies related to prevention of slavery and human trafficking

In May 2019, SEKISUI CHEMICAL Group drew up the SEKISUI CHEMICAL Group “Human Rights Policy”, based on the United Nations Guiding Principles on Business and Human Rights, to prevent all forms of slavery and human trafficking in our business and supply chains. The “Human Rights Policy” was adopted by the Board of Directors of the Company and signed by the President and Representative Director of the Company. The next steps will include thoroughly informing all employees and business partners of SEKISUI CHEMICAL Group about the “Human Rights Policy” and fully implementing the Policy.

SEKISUI CHEMICAL Group Human Rights Policy

In March 2009, SEKISUI CHEMICAL Group signed the United Nations Global Compact and, together with all of our Group companies, is supporting the Ten Principles of the UN Global Compact.

6. Human rights risks and due diligence process

(1) SEKISUI CHEMICAL Group

1) Outline of Initiatives

SEKISUI CHEMICAL Group launched initiatives aimed at building a human rights due diligence framework in November 2018. Initiatives implemented up to FY2023 are as follows.

- ① **From FY2018 to FY2019:** Employed a specialized agency (Verisk Maplecroft) to analyse potential human rights risks in major businesses and conducted internal hearings based on the results of analysis.
- ② **FY2020:** Implemented human rights interviews at domestic production sites.
- ③ **FY2021:** Conducted a survey-format human rights risk assessment on a global basis for management in all areas where the Group is located and for general as well as indirect employees at selected business locations.

- ④ **FY2022:** Remediated issues identified through the above risk assessments, and implemented human rights interviews at two locations in Japan and overseas.
 - UIEP Company: SEKISUI INDUSTRIAL PIPING CO., LTD. (Taiwan)
 - Housing Company: SEKISUI HEIM KINKI CO., LTD.
- ⑤ **FY2023:** Human rights interviews were conducted at three locations: overseas production site, domestic nursing care site, and domestic construction site.
 - High Performance Plastics Company PT. SEKISUI POLYMATECH INDONESIA
 - Housing Company: Healthy Service Corporation
 - Construction company (a business partner of the Housing Company)
- ⑥ **FY2024:** Human rights interviews were conducted at four locations: overseas production sites and domestic construction sites.
 - High Performance Plastics Company: THAI SEKISUI FOAM CO., LTD.
 - Three construction companies (business partners of the Housing Company)
- ⑦ **FY2025:** Human rights interviews were conducted at seven locations including an overseas production site, domestic construction site, and domestic production site.
 - High Performance Plastics Company SEKISUI DLJM MOLDING PRIVATE LTD.
 - Four construction companies that are business partners of housing companies and one domestic production site
 - One Urban Infrastructure & Environmental Products Company production site

2) Detailed initiatives of FY2025

① Human Rights Interview at an Overseas Production Site

In FY2025, we conducted human rights interviews at an overseas business site (India). Based on the results of a potential human rights risks analysis in FY2018 by outside experts (verisk Maplecroft) and a human rights survey conducted across all Group companies, the employees at SEKISUI DLJM MOLDING PRIVATE LTD. were confirmed as being at comparatively high human rights risk, so improvements were made with various measures. We conducted interviews to assess the status of improvements. We interviewed local employees to gain a better understanding of their actual working conditions (discrimination, harassment, appropriate wages, appropriate working hours, forced labour, occupational safety and health in the workplace, etc.).

[Targets]

15 (4 of which are women) of the 397 people (259 of which are contract employees) who work at the High Performance Plastics Company SEKISUI DLJM MOLDING PRIVATE LTD.

[Implementation method]

- As a preliminary survey, we conducted a survey of employees based on the Dhaka Principles, an international norm on responsible migrant worker employment.

- Caux Round Table Japan※1 conducted interviews with employees divided into groups by role, each lasting about an hour based on a preliminary survey.

[Survey content]

Discrimination, harassment, appropriate wages, leave, shutdown, freedom of association and collective bargaining rights, respect for women's rights, etc.

[Results]

Although no significant negative impact on the human rights of employees was found in this survey, it helped identify areas of improvement for building a better working environment, such as transparency in appropriate working hours, conditions, and wage information, respect for the rights of women, occupational safety and health, and access to help. To address these issues, SEKISUI DLJM MOLDING PRIVATE LTD. formulated a remedial action plan.

※1 Caux Round Table Japan: A specified non-profit organization with a wealth of experience in initiatives to reduce human rights risks in corporate supply chains and a network of various CSR initiative groups both domestically and abroad.

② Human Rights Interviews at Domestic Production Site and Construction Site

Since FY2020, SEKISUI CHEMICAL Group has conducted human rights assessments, including interviews with employees, at domestic production sites and construction companies of the Housing Company that employ foreign workers. This is in response to the high level of human rights risks related to the working environment of foreign workers in Japan identified through dialogue with overseas experts, etc.

In FY2025, foreign national employment management assessments, including employee interviews, were conducted at the following four construction companies, which are business partners of the Housing Company, and at one on-site partner for each of the domestic production sites of the Urban Infrastructure & Environmental Products Company.

[Targets]

- Construction Company A (business partner of the Housing Company): Two foreign nationality employees (none of whom were women) + one manager
- Construction Company B (business partner of the Housing Company): Two foreign nationality employees (none of whom were women) + one manager
- Construction Company C (business partner of the Housing Company): Five foreign nationality employees (none of whom were women) + one manager
- Construction Company D (business partner of the Housing Company): Two foreign nationality employees (none of whom were women) + one manager
- Domestic Production Site E (business partner of the Housing Company): Fourteen foreign nationality employees (none of whom were women) + one manager
- Domestic Production Site F (business partner of the Urban Infrastructure & Environmental Products Company): One-hundred foreign nationality employees (35 of whom were women) + one manager

[Implementation method]

- Conducted a preliminary survey consisting of 342 questions in 40 categories regarding human rights, and held interviews with the president, executives, foreign national employment management, or personnel and labour management supervisors based on the survey results.
- Interviews were conducted with foreign nationality employees and managers for human resources and labour management.
- Based on the results of the assessment and areas for correction pointed out by a third party organization, we will take corrective action (corrective action examples: Use of safety shoes provided by the company, etc.).

[Results]

The six companies where the interviews were conducted received high marks that exceeded the appropriate judgement criteria on items such as "employment", "labour", "in-house consensus", "human rights", and "job satisfaction", confirming that they are acting appropriately in employing foreign nationals. On the other hand, many of the items pointed out as future issues at each company were assessment systems, Japanese language education, and career planning education, which were provided as feedback to business partners.

Sustainability Report 2026 (p.129-134):

Society > Respect for Human Rights > Human Rights Due Diligence (SEKISUI CHEMICAL Group)

(2) Supply Chain

1) Sustainable Procurement Due Diligence (for business partners)

SEKISUI CHEMICAL Group conducts sustainable procurement due diligence to assess whether our business partners are operating in a socially responsible manner. Based on the results, we work with our business partners to resolve any outstanding issues.

Due diligence is conducted every three years for 1,085 business partner companies. Of this number, we directly visited 28 in FY2025 that were determined to be important according to our standards. During the visits, we identified risks through on-site observations, interviews with the management, and interviews with employees. No business partners were determined to be high risk. Also, at the seven global sites of China, Taiwan, South Korea, Southeast Asia (Thailand), Europe (Netherlands), North America (US), and Japan, programs were prepared and lectures on sustainable procurement were conducted by outside instructors.

Sustainability Report 2026 (p.133):

Society > Respect for Human Rights > Human Rights Due Diligence (Business Partners)

2) Surveys on Raw Materials (Timber and Minerals)

① Surveys on Timber Procurement

The Group is formulating Sustainable Timber Procurement Guidelines to ensure compliance with our timber procurement policy. It not only aims for legal procurement of timber, but also to lessen the negative impact on the human rights of indigenous people due to forest destruction and on the environment.

Surveys on tree species and logging areas are being conducted at 73 suppliers. We conducted interviews and clarified traceability at suppliers where raw materials come from endangered species and in countries with high-risk logging areas. We are requesting that timber from Sarawak, Malaysia, an area of particular concern for risk, be removed from procurement. FY2025 survey results directly confirmed with business partners that the applicable timber is not being procured.

Sustainability Report 2026 (p.139):

Society > Responsible Procurement > Sustainable Timber Procurement

② Surveys on Responsible Mineral Procurement

SEKISUI CHEMICAL Group holds in-house training sessions to deepen understanding of surveys on the background behind conflict minerals (minerals that fund armed insurgents) and social changes (human rights violations such as child labour). This training was conducted in advance of implementing the survey based on the Responsible Mineral Procurement survey manual.

The FY2025 survey was conducted at 55 locations that handle target minerals, including domestic and overseas branches. The results identified 85% of smelters with 15% being undisclosed or unknown among raw materials domestically, including target minerals. Overseas, 100% of smelters were identified. Going forward, if smelters are undisclosed or unknown, we will talk with business partners and consider appropriate individual responses.

Sustainability Report 2026 (p.139):

Society > Responsible Procurement > FY2025 Responsible Mineral Procurement Survey

7. Establishment of a Hotline

The SEKISUI CHEMICAL Group has established an in-house whistle-blowing system, a hotline so business partners can make reports, a customer consultation desk, and an office for sustainability inquiries so that we can listen to stakeholders and take appropriate, corrective actions when our own business activities have a negative impact on human rights.

In 2002, SEKISUI CHEMICAL Group established the in-house whistleblower system called Sekisui Compliance Assist Network (S.C.A.N.), which can be used by any employee of the Group. Also, in FY2024, the overseas multilingual whistleblower system known as the "SEKISUI

Chemical Group Global Hotline" was fully introduced globally and is up and running. Additionally, the "SEKISUI Chemical Group Global Hotline", which was being rolled out to business partners globally, has been introduced to all areas except for the Americas as of FY2025.

* Sustainability Report 2026 (p.166):

Governance > Legal and Ethical Issues > Promoting and Operating the Internal Whistle-blowing System

8. Education about slavery and human trafficking

(1) Human rights training programmes for Group employees

SEKISUI CHEMICAL Group conducts training and educational programmes focusing on the theme of human rights for its employees. In this manner, the Group is endeavouring to engage in management that takes into consideration concerns regarding human rights. Training, especially at such milestones as when an employee enters the Company or is promoted, is designed to raise awareness of human rights issues including forced labour, child labour, and harassment, thereby promoting the importance of respecting human rights and our human rights policy.

In FY2020, as part of human rights education for domestic and overseas employees, "Business and Human Rights e-Learning" was introduced to employees in all areas operated by the Group (North America, Europe, Asia) via the intranet, helping promote the importance of respecting human rights and spreading the word about human rights policies.

In FY2025, "Compliance e-Learning" (joint project between the October compliance month and December human rights month), which was introduced in FY2024 for all global Group employees to promote understanding of a wide range of information on human rights and compliance, was implemented in close collaboration with managers and persons in charge of personnel and legal affairs in each area to improve attendance.

(2) Implemented SEKISUI CHEMICAL Group Human Rights Month

As part of efforts to provide educational opportunities so that employees can act with respect for human rights, the SEKISUI CHEMICAL Group implemented the Human Rights Month in December 2025. In addition to delivering the president's message translated into 11 languages to all Group companies and creating human rights posters (Japanese and English), we conducted an online Business and Human Rights Seminar domestically on 5th December. A video on the issue of foreign labourers in Japan, a familiar theme, was shown during Human Rights Month.

* Sustainability Report 2026 (p.134):

Society > Respect for Human Rights > Human Rights Education

9. Engagement with external stakeholders

From June to December 2024, the SEKISUI CHEMICAL Group participated in the

Stakeholder Engagement Programme^{※2} where companies in various industries, NPOs, NGOs, and other prominent figures exchanged opinions on promoting human rights due diligence initiatives. After participating companies listened to presentations by NPOs, NGOs, and other prominent figures on a wide range of social issues with a focus on human rights and environmental subjects garnering attention around the world, various stakeholders engaged in a discussion to identify key human rights issues in each industry. We are currently sharing the new information and knowledge gained at the event to further promote activities by strengthening the foundation for human rights initiatives at the Company. We will continue to use the opinions of these stakeholders to promote systematic human rights initiatives in accordance with the Guiding Principles on Business and Human Rights.

※2 Stakeholder Engagement Program: Hosted by the Caux Round Table Japan

* Sustainability Report 2026 (p.134):

Society > Respect for Human Rights > Stakeholder Engagement

1 0. Plans for the future

Based on the perspective of the Guiding Principles on Business and Human Rights, we will strive to ensure that our business and supply chains do not cause or contribute to human rights abuses. In FY2026, company management joined Human Rights Promotion Subcommittee meetings to enhance coordination with business activities, identifying the following three points as important measures concerning "Business and Human Rights".

(1) Fostering and spreading a culture of respect for human rights

To ensure that all employees are aware of the human rights policy and that a climate of respect for human rights is fostered throughout the Group, we will develop and implement measures to disseminate the policy to employees through the following initiatives.

1) Working with Key Personnel

To ensure that human rights initiatives are implemented throughout the Group, key persons at each business unit and group company are identified to work together and deepen their understanding of the activities.

2) Raise level of understanding by management and executives

Conduct trainings and lectures for executive officers and Group executives to increase understanding among senior management.

3) Raise awareness on "Business and Human Rights" throughout the Group

Hold Human Rights Month in all areas where the Group operates in order to raise the level of understanding of human rights throughout the Group.

(2) Implementing human rights due diligence and reducing risks

1) SEKISUI CHEMICAL Group

Human rights risk assessments will continue to be conducted at domestic production sites that have been indicated as having potentially high human rights risks and for foreign workers at construction sites in Japan and production sites in Asia. In addition, in

order to raise Group-wide awareness of human rights issues and achieve more effective prevention and mitigation of human rights risks, we will promote the transition of operating entity for human rights due diligence from Corporate Headquarters to Regional Headquarters and Divisional Companies.

2) Business partners

Due diligence on sustainable procurement is conducted every three years. In FY2026, the due diligence method for the initial year of the cycle will be reworked to conduct our own unique risk classification process.

(3) Implementation of Grievance Mechanism

Use the multilingual global hotline and promote establishment of the hotline among non-Japanese employees and business partners.

This statement was adopted by the Board of Directors of the Company and signed by Ikusuke Shimizu, President and Representative Director of the Company.

September 30, 2026

President and Representative Director SEKISUI CHEMICAL Co., Ltd.

Ikusuke Shimizu