

NKT Photonics Modern Slavery Act Transparency Statement

NKT Photonics' ('NKTP') core values of honesty, reliability, responsible, and ethical behavior along with our other trading policies reflect our commitment to act ethically and responsibly in all our business relationships. NKTP requires all employees and business partners to demonstrate ethical behavior in all of our interactions with customers, suppliers, and colleagues in accordance with the NKTP Code of Conduct.

On March 26, 2015, the Modern Slavery Act 2015 was passed into law in the United Kingdom. This act requires NKTP to prepare and publish a slavery and human trafficking statement for each financial year of the organization. NKTP fully supports the aims of the legislation and is determined to comply with applicable anti-slavery and human trafficking laws.

Organization structure and Supply Chains

The Purchasing department along with other departments is responsible for the spending decisions in regard to the steps that the departments have taken to prevent modern slavery in NKTP's supply chains.

NKTP's General Purchasing Terms and Conditions contain compliance provisions requiring our suppliers in all tiers to comply with all applicable legislation, including anti-slavery and human trafficking. In addition, it communicates NKTP expectations regarding our suppliers' compliance with international ethical standards, including regulations on anti-slavery and human trafficking.

Policies in relation to Slavery and Human Trafficking

NKTP has made efforts to address the risks of slavery and human trafficking violations in our own business. During pre-employment screening of potential employees, NKTP verifies that individuals are eligible to work in the Company and meet all applicable age requirements.

NKTP General Purchasing Terms and Conditions states that the supplier must comply with and have in place adequate procedures designed to ensure that an employee or an associated person in any way connected to this agreement complies with anti-slavery provisions, including the UK Modern Slavery Act.

We have developed a number of compliance policies designed to combat any unethical business conduct and expect our suppliers to comply with our Business Code of Conduct.

Due diligence processes and Risk assessment

NKTP is continuing to review its processes and supplier relationships to comply with the UK Modern Slavery Act.

Key performance indicators to measure effectiveness of steps being taken

We operate a Whistleblowing Hotline accessible from our homepage to provide adequate protection for employees, or third parties, who raise any such concerns.

Employees are expected to report any violations of the NKTP Business Code of Conduct via the Hotline. Suppliers, customers, partners, shareholders, and any stakeholders are encouraged to report concerns anonymously via the Hotline.

Reports are reviewed and appropriate action including investigations and corrective actions are taken within a reasonable period. Employees and suppliers are protected from retaliation for making a report in good faith, and anyone found to have acted against this protection is subject to disciplinary action.

We expect our suppliers to share our commitment on human rights and zero tolerance approach to modern slavery. The use of forced or slave labour, whether in the form of indentured, bonded or prison labour by any entity within the supply chain is prohibited. Additionally, support of human trafficking of involuntary labour through threat, force, fraudulent claims, or any other form of coercion is also prohibited. Where it is found that a supplier has breached this policy, we shall immediately terminate our relationship with that supplier. We will continue to monitor and review our processes to prevent any form of modern-day slavery and/or human trafficking in our business or supply chain.

Training on modern slavery and trafficking

NKTP provides Ethics and Compliance awareness training to its employees, and in competition law and anti-bribery for those employees exposed above average level.

This UK Modern Slavery Act Transparency Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes our company (Group) slavery and human trafficking statement for the financial year ending 31 December 2021.

This statement has been duly approved and adopted by the Board of Directors of NKT Photonics A/S (and Group) who have delegated authority to the President & Chief Executive Officer of the NKTP Group to sign this statement on their behalf.



Basil Garabet

President & Chief Executive Officer: NKT Photonics A/S
28 February 2022