

Anti-slavery and Human Trafficking Statement 2021

January 2021

Newport Wafer Fab Limited is committed to acting ethically and with integrity in all of its business dealings. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain. This statement is provided in compliance with the Modern Slavery Act 2015 ("the 2015 Act") and sets out our approach to ensuring that Modern Slavery does not take place anywhere within our own business or in any of our supply chains.

Due Diligence in our business operations

Our internal policies and practices help us to ensure that all our employees conduct themselves and their business activities in an ethical manner. We have a well-established Code of Business Ethics, which is made available to all employees and refresher training on the standard is conducted on an annual basis for all personnel who operate within key roles such as Sales, Marketing and Finance. The Code makes specific reference to our obligations under the 2015 Act and the standards of behaviour outlined in the Policy.

We encourage our employees to raise any questions and concerns relating to ethical business practices either directly through their manager or via the established Staff Association body who meet on a monthly basis. The NWF Whistle Blowing Policy is prominently displayed and communicated to all personnel providing a route for employees to report alleged breaches of the Policy on an anonymous basis.

Due Diligence in our Supply Chain

Newport Wafer Fab employs a Risk Analysis approach to manage its supplier base. Compliance to our key requirements and core values are determined via activities such as remote audits, onsite audits and extensive supplier questionnaires. On an annual basis all our key suppliers are required to complete and return a supplier questionnaire which includes a whole section on CSR related issues such as Modern Slavery, Anti Bribery and Employee Code of Conduct and Ethics.

NWF has published a Supplier Manual which is posted on the company website which also sets out our expectations of the standards that we require from our supplier base concerning Sustainability, Modern Slavery, Conflict Minerals and Corporate Social Responsibility (CSR)

Breaches in compliance can result in supplier status being withdrawn.

Moving Forward

We will continue to review and develop our current policies and practices over the next year and diligently monitor compliance and implement modifications to our activities as required.

This statement has been made in accordance with the reporting requirements clause 54, part 6 of the UK Modern Slavery Act and applies to all parts of Newport Wafer Fab Limited.

Dr Paul James
Managing Director