

Accsys Technologies PLC
("Accsys" Or "The Company"¹)

Modern Slavery Act Statement

This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015 ("the Act"), demonstrates our commitment to tackle modern slavery and sets out the approach taken by Accsys to:

- understand whether slavery, servitude, forced labour and/or human trafficking (together "Modern Slavery") exist in our supply chain;
- mitigate the risk of Modern Slavery permeating our supply chain; and
- seek to eliminate Modern Slavery from our business and supply chain during the financial year ended 31 March 2025.

Introduction

Accsys is a growing business with a purpose: "changing wood to change the world". We hold a strong belief that we have a collective social responsibility to use and develop our technology to contribute to a better world, most directly in regard to climate change and pollution. Together with health and safety, and our growth strategy, these are fundamental priorities for our business. Our values derive from our purpose, and we believe that a focus on corporate governance and social responsibility is crucial to our organisation.

As part of our focus on social responsibility, we are committed to improving our practices to combat and prevent Modern Slavery in all areas of our business and supply chain.

Organisational structure and supply chains

Accsys is a fast-growing business with a purpose of changing wood to change the world. We make high performance wood products that are extremely durable and stable, opening new opportunities for the built environment. By doing so, we give the world a choice to build sustainably. We transform fast-growing, certified sustainable wood into a building material with characteristics that match or better those of man-made, intensely resource-depleting and heavily carbon-polluting alternatives. In FY 2025, Accsys produced and sold 63,864m³ of Accoya.

Accsys has over 200 employees and sells its products in every continent. Accsys' head office is in London, with manufacturing operations in Arnhem, the Netherlands, in Barry, Wales and in Kingsport, Tennessee, USA. The Kingsport site is an additional Accoya® production plant with joint venture partner, Eastman Chemical Company. Research and development is also

¹ References to Accsys or the Company shall include subsidiary companies of Accsys (including its joint venture company, Accoya USA, LLC) as the context may admit.

conducted at our sites in Arnhem and Barry.

Accsys' operations interact with many functions and industries - chemical technology, wood processing and production of modified wood, the construction and operation of acetylation plants, as well as sales, marketing, support and distribution.

Our supply chains include the following key elements:

- The purchase and sale of wood materials;
- The purchase of acetic anhydride and sale or recycling/upcycling of by-product acetic acid;
- The procurement of transport, logistics, and manufacturing support services;
- The procurement of utilities required to operate our acetylation plant process;
- The procurement of utilities, materials and/or services required to perform Research & Development and Quality Control; and
- The procurement of acetylation plant equipment, construction, engineering and maintenance services.

Accsys' key suppliers of raw wood operate in New Zealand, Spain and Chile with suppliers of chemicals operating in the US, UK, Saudi Arabia and Switzerland and equipment, advice and other services being provided by Netherlands, US and UK-based suppliers.

Where considered appropriate, due diligence is performed on key suppliers, covering amongst other things supplier ethics and conduct, in order to identify and mitigate areas of risk in the supply chain.

Our due diligence

As part of our initiatives to mitigate risk in our business and supply chain, we purchase goods and services from suppliers, and sell and license our Accoya® and Tricoya® products, from and to third parties that we believe take the same stance as us against slavery and human trafficking. We also conduct regular supply chain verification and auditing.

To produce Accoya®, only abundantly available wood species are used from sustainably managed forests and tree plantations. These are certified by the FSC® (www.fsc-uk.org/en-uk), which includes a key principle of protecting workers' rights, or occasionally by other reputable certification bodies (e.g. PEFC). Our procedures and practices are assessed annually by the independent certification body, Control Union (www.controlunion.com) to ensure that we meet FSC® and PEFC chain of custody guidelines and the mills that supply us also complete annual audits. All Accoya® and Tricoya® is also compliant with the Timber and Timber Products Placing on the Market Regulations (UKTR), European Union Timber Regulation (EUTR) as well as the USA's Lacey Act, which imposes obligations on us to carry out due diligence into the practices of our timber suppliers.

Besides the responsible sourcing of timber, Accsys has ensured that the main suppliers of acetic anhydride, our other key material in the production of Accoya® and Tricoya®, have made commitments to comply with the Act.

We are currently reviewing our supply chain due diligence processes to ensure that they are appropriate to mitigate the risk of Modern Slavery permeating our supply chain as we seek to eliminate Modern Slavery throughout our business and supply chain. This includes reviewing due diligence surrounding suppliers' commitment to principles on human rights and labour and establishing that they are not aware of any slavery or human trafficking within their business or supply chain, by adherence to the UN Global Compact or otherwise.

Our policies and commitments

The global issues caused by Modern Slavery exist across all sectors and industries. We acknowledge that it is our responsibility to mitigate every potential Modern Slavery risk. The business is committed to ensuring that we do all we can to prevent Modern Slavery in our supply chain and to demonstrate that we will not tolerate any Modern Slavery in our supply chain or any other part of the business.

We are committed to supporting and upholding the following measures to safeguard against Modern Slavery:

- Zero tolerance to slavery in any form within our organisation, joint venture partners, and our supply chains.
- Prevention, detection and reporting of slavery in any form in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf.
- We are committed to engaging with our stakeholders and suppliers to monitor, mitigate and minimise the risk of slavery in any form in our operations and supply chain.
- Our Supplier Code of Conduct clearly sets expectations and requirements for current and potential suppliers, and their employees, as well as their parent, subsidiary or affiliate entities, and sub-contractors. This includes specific topics such as forced labour, child labour, conditions of work, health and safety, human rights and standards for continuous improvement.
- In the event of any breach of our zero tolerance approach to slavery in any form, we will ensure that we take appropriate action.
- We will periodically review our policies, suppliers and our Supplier Code of Conduct to keep them up to date, appropriate and effective.

We are not aware of any Modern Slavery in our supply chain or any part of our business and are committed to ensuring the same on an ongoing basis.

Accsys is also aware of the impact that its business and operations have on the wider community and places great importance on community and social responsibility, as demonstrated by our charitable product donations to several charities.

In addition, our internal policies, which include those within our employment contracts and employee handbooks, also reflect our commitment to acting ethically and with integrity in all of our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place in relation to our business activities.

Our internal policies apply to all Company employees. Any non-compliance with such policies may result in disciplinary action. The Company encourages employees to report any concerns, wrongdoing, or danger in the workplace without fear of reprisal. Accsys' Whistleblowing Policy also provides an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace.

Supplier and customer adherence to our values

Our Senior Leadership Team is asked to confirm on an annual basis that it is not aware of any instances of slavery or human trafficking within any part of our business or supply chain. This team is responsible for all areas of our business including:

- Legal and Compliance
- Health, Safety and Environment
- Human Resources
- Procurement
- Production and Engineering
- Sales
- Marketing and Communications
- Sustainability and ESG
- Business Development and Licensing
- Finance, Auditing and Risk
- Research and Development

Our standard form contracts, including with our key business partners, provide for their compliance with law and regulation relating to the sale and purchase of goods. As a company operating within the UK, the Netherlands, the US and globally, the Company has sought to update its standard form distribution agreements to expressly provide for anti-slavery and human trafficking and the Company has effected such change where reasonably possible. These changes apply across Accsys operations, not only within the UK.

Our Supplier Code of Conduct sets out Accsys' expectations for all suppliers in relation to labour, human rights, environmental and ethical conduct can be accessed via our website ([2025-01-08-Supplier-Code-of-Conduct.pdf](#))

Non-adherence to the principles stated within the Code of Conduct is a key determinant as to whether a supplier is deemed eligible to do business with us.

Our Timber Procurement team conduct quarterly due diligence reviews of all known shippers used by our global suppliers of wood to monitor for risks and seek assurance that they do not engage in slavery and human trafficking practices. In the last financial year, quarterly reviews of the shippers known to be used by our suppliers have not revealed any concerns.

Training

We have a Group-wide compliance training programme, which includes content on slavery and human trafficking which must be completed annually. In so doing, awareness and understanding of slavery and human trafficking has been elevated and our ability to detect and prevent these practices has been increased throughout the organisation. 100% of relevant employees completed training on Modern Slavery in FY25.

Risk assessment and management

The Executive Committee is responsible for identifying, assessing, responding, managing and providing oversight on Modern Slavery. In turn, the Executive Committee review Modern Slavery risks with relevant members of their Senior Leadership Team. Any issues or concerns related to Modern Slavery are reported on by the Executive to the Board, with ultimate responsibility resting with the Board.

The Company considers risks of Modern Slavery in all its activities, which includes chemicals and forestry product procurement, and has a notable focus on international transportation service providers. The Company assesses this risk by reference to various data points, including the Global Slavery Index score of the jurisdiction of operation of relevant suppliers. The Company mitigates risk in this way through a combination of factors, including focussing on suppliers based in jurisdictions perceived to present a higher risk of slavery and human trafficking, using certified and independently audited suppliers where possible and using suitable systems, such as Control Union's WoodTrack due diligence system which provides full traceability from forests through each step of the supply chain.

Monitoring and evaluation

We do not have a corporate key performance indicator in relation to combatting Modern Slavery specifically, as any instance would be a breach of law, our supplier standards and/or our company policies.

The year ahead

We are committed to continuing to ensure our business remains free from slavery and human trafficking. In the 2026 financial year, we will continue to implement our anti-slavery and human trafficking policies, procedures and practices, monitor our supply chain and businesses, and liaise with business counterparts to further promote our expectations and efforts against slavery and human trafficking.

To ensure a high level of understanding of the risks of slavery and human trafficking in our supply chains and our business, we will continue to discuss and monitor these important issues internally and ensure our procedures remain effective.

Accsys' Board of Directors has adopted this statement on behalf of Accsys Technologies PLC on 24 September 2025.

Signed for and on behalf of Accsys Technologies PLC by:



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Jelena Arsic van Os

Chief Executive Officer

30 September 2025