Modern Slavery

Our Commitment

At Oxford Instruments, we are committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chain. We have a zero-tolerance approach to all forms of modern slavery, including servitude, forced, bonded and compulsory labour, and human trafficking, and we expect our suppliers to adopt the same approach.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our anti-slavery and human trafficking statement for the financial year commencing 01 April 2021 and ending 31 March 2022.

This statement has been approved by the Directors of Oxford Instruments plc, Oxford Instruments Nanotechnology Tools Limited and Andor Technology Limited (the "Companies"), respectively. It was approved by the Board of Oxford Instruments plc at its meeting on 20 September 2022. It is signed by Ian Barkshire, Chief Executive, in his capacity as a Director of each of the Companies.

Our Business

Oxford Instruments is a global provider of high technology products and services. It plays a critical role in the advancement of society by enabling leading industrial companies and scientific research institutes to tackle some of the world's most complex challenges and growth opportunities.

With offices around the world, we work closely with our customers to create the products they need to achieve meaningful change and growth. This is fuelled by our purpose to enable a greener, healthier, more connected, advanced society, putting us as the heart of creating a more sustainable future.

We have discrete business groups operating internationally and we recognise the importance of the protection of human rights across our Group.

Our Structure

The entities in our Group which fall within the criteria defined in the Act are Oxford Instruments plc, Oxford Instruments Nanotechnology Tools Limited and Andor Technology Limited.

The Group has circa 1,850 employees worldwide and operates in 16 countries.

The Group has a global annual turnover of circa £370M.

Our policies on slavery and human trafficking

As part of our commitment to combatting modern slavery and human trafficking, we have developed and maintain internal policies and procedures to reinforce our approach. These documents are designed to be easy to use and are intended to assist our employees in their due diligence of suppliers. In addition, we have a publicly available global Code of Business Conduct and Ethics, which sends a clear message to our employees, business partners, stakeholders, and investors of our business principles and ethics.

Due diligence processes for slavery and human trafficking

We are committed to acting ethically and with integrity in all our business dealings and to putting in place effective systems and controls which aim to ensure modern slavery is not taking place anywhere in our own business or in our supply chains. As part of this commitment, we focus on the welfare and safety of individuals at potential risk, undertake periodic due diligence reviews of our key suppliers and, where appropriate, provide support and guidance to help suppliers to address any concerns that they might have in their own business and supply chain.

We take a risk-based approach and have developed our processes to create profiles of key and high-risk suppliers. Both new and existing key and high-risk suppliers are expected to adopt the same or similar standards to those contained within our policies and they are expected to hold their own suppliers to the same or similar standards.

Supplier adherence to our values

We operate our business in compliance with applicable laws and regulations and we expect our suppliers to do the same, including the laws against modern slavery. Our expectations are set out in our Code of Conduct for Representatives and Suppliers which is available via this link:

https://www.oxinst.com/assets/uploads/documents/OI_COC_REPS_SUPPLIERS.pdf

In addition, we endeavour to include a provision within our purchase contracts with our suppliers, whereby suppliers are asked to warrant that in performing their contractual obligations they will ensure that they and their sub-contractors shall:

- comply with all applicable laws, statutes, regulations and codes relating to modern slavery, anti-bribery and anti-corruption, including but not limited to the Modern Slavery Act 2015, the Bribery Act 2010 and Oxford Instruments' Code of Conduct for Representatives and Suppliers;
- take reasonable steps to ensure that there is no slavery, human trafficking, bribery or corruption in their business or supply chains and that they have and maintain their own policies and procedures; and
- to promptly notify Oxford Instruments as soon as they become aware of any actual or suspected slavery, human trafficking, bribery or corruption in their business or supply chains.

Training

We believe in the importance of educating our employees on human rights issues and have launched bespoke training for relevant employees to help them to recognise the risks of modern slavery and human trafficking in our business and supply chains.

Through this training, our employees are guided to use our procedures for reporting a business malpractice to raise any concerns they might have, which includes access to an independent whistleblowing service.

Whistleblowing Hotline and Employee Forums

Our third-party whistleblowing hotline, Safecall, is a fully confidential and independent service which provides our employees with a process to raise concerns and disclose information related to suspected wrongdoing or dangers at work. This service is an added measure to ensure our compliance with all legal obligations and enhances our ability to address ethical concerns, including issues related to human rights.

During any visits with suppliers, employees are expected to escalate concerns of any type to management or via this whistleblowing hotline.

Employees at most of our businesses have access to an Employee Forum via their Employee Representatives, who have the opportunity to raise and discuss topics of concern with members of the Senior Management Team at regular Employee Forum meetings.

Our effectiveness in combating slavery and human trafficking

To date, we have not identified any current suspected incidences of modern slavery in our supply chains.

Further steps

We constantly strive to improve our systems and processes to root out modern slavery from our supply chain and within our business. To drive further progress in this, we have taken the following actions:

- our new Board Sustainability Committee, which is Chaired by Sir Nigel Sheinwald and supported by the Senior Management Team, provides a direct overview of our Environmental, Social, and Governance ("ESG") agenda. Modern Slavery prevention is one of the eight key areas under the Governance section of the ESG agenda and accordingly has the full focus of the Sustainability Committee;
- established a Corporate and Social Responsibility Forum that has developed a 'Supplier Portal' which provides an on-line tool to help us better undertake and audit supplier due diligence;
- undertaken a detailed review and update of our global human resource policies and procedures; and
- updated our modern slavery training to specifically reference the International Labour Organisation's eleven indicators of forced labour and explain how they can be used to help identify victims of modern slavery. The modern slavery training has been provided as a priority to the employees of our recently acquired company, WITec Wissenschaftliche Instrumente und Technologie GmbH.



Ian Barkshire

Chief Executive

Director of Oxford Instruments plc, Oxford Instruments Nanotechnology Tools Limited and Andor Technology Limited