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 take 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 1 April 2023 and ending 31 March 2024.

This statement has been approved by the Directors of Oxford Instruments plc, Oxford Instruments Nanotechnology Tools Limited, and Andor Technology Limited (the "Companies") respectively, as set out below.

Our business

Oxford Instruments provides academic and commercial organisations worldwide with market-leading scientific technology and expertise across our key market segments: Materials Analysis, Semiconductors and Healthcare & Life Science.

Innovation is the driving force behind our growth and success, supporting our core purpose to accelerate the breakthroughs that create a brighter future for our world. We hold a unique position to anticipate global drivers and connect academic researchers with commercial applications engineers, acting as a catalyst that powers real world progress.

We are wholly committed to conducting our business responsibly and holding ourselves to high ethical standards as we strive to operate with the highest standards and integrity. Our strong values underpin everything we do; from how we work with each other and our customers to how we trade with suppliers. Every representative of Oxford Instruments is expected to behave in a way which is consistent with these values.

With more than 2,200 colleagues operating throughout our global businesses and an extensive network of partners and suppliers, we recognise the importance of protecting human rights across our Group and our supply chain.

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 2,270 employees worldwide and operates in 23 countries.

The Group had a global annual turnover of circa £470.4 million in the latest financial year.

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 Conduct, which sends a clear message to our employees, business partners, stakeholders, and investors about 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 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 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 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, including laws against modern slavery, and we expect our suppliers to do the same. Our expectations are set out in our recently updated Code of Conduct for Representatives and Suppliers and in our newly launched Supplier Quality Manual.

In addition, we endeavour to include provisions within our purchase contracts that require suppliers 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
- 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 chain.

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 chain.

Through this training, our employees are guided to use our procedures 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, representatives, and suppliers with a process to promptly raise concerns, including any concerns pertaining to violations of human rights. The service is available from anywhere in the world, 24 hours a day, every day of the year, in more than 175 languages and dialects.

This service is an added measure to ensure our compliance with all legal obligations and enhances our ability to promptly address ethical concerns, including those related to human rights.

During or following any visits with suppliers, our employees are expected to escalate conduct and/or ethical concerns of any type to their management team or via the Safecall whistleblowing hotline.

Employees at most of our businesses also have access to an Employee Forum via their Employee Representatives. Employee Representatives

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 business or supply chain.

Further steps

We constantly strive to improve our systems and processes to ensure that modern slavery is not present in our supply chain or within our business. Our Board-level Sustainability Committee, chaired by Sir Nigel Sheinwald, provides oversight of our wider Environmental, Social, and Governance ("ESG") agenda. Modern slavery prevention is one of the key areas under the Governance section of the ESG agenda. To drive further progress in this area, we have taken the following actions:

- We have commenced the revision of our global Code of Conduct and plan to reissue it digitally to all colleagues during 2024.
- Access to our third-party whistleblowing hotline, Safecall, has been extended to our representatives and suppliers to enable them to confidentially raise any concerns they may have about behaviours which are inconsistent with our ethical standards.
- We have developed and launched a new Whistleblowing Policy and issued bespoke whistleblowing training to our employees.
- We have updated our Code of Conduct for Representatives and Suppliers to summarise the standards we expect our representatives and suppliers to adhere to.
- We have developed a new Supplier Quality Manual which builds on our overarching Code of Conduct for Representatives and Suppliers by focusing on detailed, supplier specific standards and requirements.

- We have revised and updated our key supplier due diligence process to ensure that it remains robust and fit for purpose.
- We have launched a suite of compliance training courses for our employees globally, including specific training on modern slavery, which will be launched in 2024 and delivered annually thereafter.
- We have updated our standard terms and conditions of purchase to include express contractual requirements requiring our suppliers to adhere to the requirements set out in our Code of Conduct for Representatives and Suppliers and in our Supplier Quality Manual.
- We have updated our standard sales paperwork to expressly reference the availability of our whistleblowing hotline.
- We have reviewed and updated our Global Human Rights Policy, which emphasises our zero-tolerance commitment to all forms of modern slavery.

Richard Tyson
Chief Executive Officer
Oxford Instruments plc

Approved by the Board of Directors of:

- Oxford Instruments plc on 17 September 2024;
- Oxford Instruments Nanotechnology Tools Limited on 23 July 2024; and
- Andor Technology Limited on 13 August 2024