THORLABS

Modern Slavery and Human Trafficking Statement 2025

Introduction

Thorlabs Inc. and its UK subsidiary, Thorlabs Ltd. ("Thorlabs" or "the Company") is committed to conducting business with the highest ethical standards and takes a zero-tolerance approach to modern slavery and human trafficking in all forms. This statement outlines the steps we have taken to ensure modern slavery and human trafficking are not present in our business operations or supply chains.

Our Business

Thorlabs is a global leader in the photonics industry, providing optical and optoelectronic equipment for research and industrial applications. Operating across **9 countries**, our business spans manufacturing, sales, and research and development, involving a diverse and complex supply chain.

Our Policies

Thorlabs is committed to maintaining a workplace and supply chain free from modern slavery. We enforce this commitment through the following policies:

1. **Code of Conduct**: Defines our expectations for ethical behaviour, including prohibitions against forced labour, child labour, and human trafficking.
2. **Supplier Code of Conduct**: Requires all suppliers to adhere to our ethical standards and provide safe, fair working conditions.
3. **Whistleblowing Policy**: Encourages employees, suppliers, and contractors to report any concerns regarding unethical practices, including suspected modern slavery.

Risk Assessment and Due Diligence

Thorlabs employs a robust risk management framework to identify and address potential risks related to modern slavery within our operations and supply chain:

- **Risk Mapping**: Analysing supply chain tiers to identify regions or industries with higher vulnerability to modern slavery.
- **Supplier Audits**: Conducting periodic assessments of high-risk suppliers, focusing on labour practices and working conditions.
- **Contracts**: Including modern slavery compliance clauses in supplier agreements to ensure adherence to legal and ethical standards.

Training and Awareness

We recognize that awareness is critical in combating modern slavery. Thorlabs provides regular training for employees, especially those in procurement and supply chain roles, to help identify signs of modern slavery and understand their role in preventing it.

Performance Monitoring

We continuously monitor the effectiveness of our policies and procedures by:

- Reviewing the outcomes of supplier audits and assessments.
- Investigating and responding to reports of potential ethical violations.
- Setting annual targets to improve supplier compliance and transparency.

Looking Ahead

Thorlabs is committed to continuously improving its practices to combat modern slavery. In the coming year, we aim to:

- Expand training programs to all employees and key stakeholders.
- Enhance our supplier audit process with deeper engagement and follow-up.

Approval

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Thorlabs Ltd's slavery and human trafficking statement for the financial year ending 31st December 2024. It has been approved by the board of directors and signed by:

Jennifer Cable
Director and President
Thorlabs Inc.