

UK Modern Slavery Act Statement

(Fiscal Year ended March 31, 2025)

Proterial, Ltd. ("Company") is pleased to publish the following statement regarding its commitment to preventing slavery and human trafficking within the Proterial Group and its supply chain, in accordance with the UK Modern Slavery Act 2015.

1. Organization Structure and Supply Chains of Proterial Group

The Company is a materials manufacturer with core technologies in high-performance materials, developing a wide range of businesses in sectors related to industrial infrastructure, automobiles, and electronics. As of March 31, 2025, the Proterial Group consists of the Company and its 48 consolidated subsidiaries, with approximately 18,877 employees on a consolidated basis.

For more information on the Proterial Group companies and businesses, please refer to the ["Corporate Profile"](#) section of the Company's website.

The Proterial Group procures materials and services from various suppliers ("procurement partners") necessary to carry out its business.

2. Policies in Relation to Slavery and Human Trafficking

The Proterial Group emphasizes respect for human rights in the "Proterial Group Codes of Conduct" and the "Proterial Group Human Rights Policy," maintaining a basic stance of respecting the rights of all individuals involved in its business activities and striving not to infringe upon them. To procure materials in line with these guidelines, we have also established the "Proterial Group Sustainable Procurement Guidelines."

(a) Proterial Group Codes of Conduct

The Codes of Conduct define the bases for judgment and actions to be taken by all officers and employees of the Proterial Group to realize our corporate philosophy and fulfill our social responsibilities. We clearly state our respect for human rights and evaluate efforts to address human rights violations when selecting procurement partners.

(b) Proterial Group Human Rights Policy

This policy is based on our corporate philosophy, which stipulates respect for the human rights of every individual. We fulfill our responsibility to respect human rights through diversity, creativity, motivation, and multifaceted thinking. The Proterial Group does not discriminate based on family

origin, gender, age, nationality, race, ideology, creed, religion, disability, or illness, and is committed to ensuring that human rights are not infringed upon in business and transactions.

(c) Proterial Group Sustainable Procurement Guidelines

These guidelines summarize the Proterial Group's sustainability policies and initiatives, stipulating items to be observed by procurement partners as the "Procurement Partner Code of Conduct." The Proterial Group works with its procurement partners to promote business activities that emphasize sustainability, including the protection of human rights.

3. Human Rights Initiatives of Proterial Group

In accordance with the above codes, policies, and guidelines, the Proterial Group takes the following actions to address human rights risks:

(a) Human Rights Due Diligence Processes

The Proterial Group conducts human rights due diligence to identify the human rights impacts of its business activities and value chain, identify potential risks, and prioritize countermeasures. We consider priorities and measures, such as assessing the impact of our supply chain on human rights in our procurement department and assessing the impact on employees in our human resources department.

(b) Risk Assessment and Management

To strengthen global human rights risk management, we organized the Human Rights Risk Management Promotion Committee in April 2021. Through these activities, we promote appropriate management of human rights risks.

An assessment of human rights risks within the Proterial Group is conducted in terms of "severity" and "likelihood of occurrence" to identify major human rights risks. Key human rights risks include forced labor, child labor, working hours, discrimination, and living conditions.

To assess and manage human rights risks in the supply chain, we present the Proterial Group Sustainable Procurement Guidelines to our procurement partners and ask them to comply. We confirm our response to human rights risks by surveying our major procurement partners regarding their compliance with these guidelines.

Additionally, we have established a reporting system on our website that can be used by stakeholders, including procurement partners, in the event of human rights violations.

4. Training

The Proterial Group implements various measures to inform and train employees on human rights risks:

(a) All officers and employees of the Proterial Group are made thoroughly aware of the Proterial Group Codes of Conduct by distributing cards summarizing the Codes of Conduct to them. Additionally, we have prepared the Proterial Group CSR Guidebook, which defines our basic approach to compliance with laws, regulations, and ethical standards, and outlines how we should behave to correctly understand the various requirements set forth in the Proterial Group Codes of Conduct and to properly conduct our business activities. This guidebook is distributed and shared with officers and employees.

(b) Each year, the Proterial Group conducts training for all officers and employees, including distribution of messages from top management and e-learning, to raise awareness of compliance and integrity.

5. Looking Ahead

The Proterial Group will continue to promote respect for human rights, including the prevention of slave labor and human trafficking, within the Proterial Group and its entire supply chain in accordance with the “Proterial Group Codes of Conduct,” “Proterial Group Human Rights Policy,” and “Proterial Group Sustainable Procurement Guidelines.” We will work to promote respect for human rights throughout the Proterial Group and its supply chain.

In our efforts to respect human rights, we will regularly check our procurement guidelines compliance with our procurement partners. Additionally, we will continue to monitor the number and content of reports from stakeholders regarding slave labor and human trafficking. When reports are received, we will conduct a fair investigation and take necessary corrective measures when facts are recognized.

This statement was approved by the Board of Directors of the Company on October 15, 2025.

October 31, 2025

Proterial, Ltd.

Sean M Stack
Representative Director, Chairman, President and CEO