Modern Slavery Act Transparency Statement

Our Organization:
NSG Group acknowledges internationally proclaimed human rights and is fully committed to combat slavery and human trafficking. We are a manufacturer of high performance glass and glazing solutions and operate in 28 countries including having a major presence in the United Kingdom in addition to Japan where our ultimate parent company is incorporated. We operate in three main sectors. Architectural supplies glass for architectural and Solar Energy applications, while Automotive serves the original equipment, aftermarket replacement and specialized transport glazing markets. Technical Glass products include very thin glass for displays, lenses and light guides for printers, and glass fiber, used in battery separators and engine timing belts. The NSG Group has around 27,000 permanent employees worldwide.

Our policies on slavery and human trafficking:
We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This commitment is reflected in the following Group Policies and Codes:

- NSG Group Code of Ethics
- NSG Group HR Policy
- NSG Group Employment Policy
- NSG Group Procurement Policy
- NSG Group Supplier Code of Conduct

A. Employees
As part of the sustainability processes already in place, Regional Human Resource Directors are asked to confirm on an annual basis that

- Recruitment systems are in place to prevent forced labour
- No NSG Companies have been convicted for the use of forced or bonded labour
- Processes are in place for employees to report any concerns on human rights

In this connection, “forced labour” is defined as all work and service which is extracted from any person under the menace of any penalty and for which the said person has not offered her/himself voluntarily.

B. Suppliers:
Our supply chain consists of more than 30,000 active suppliers around the world. This supply chain is managed by our Group Procurement which operates as a single global function, structured across all Business Lines. We develop and implement best-fit strategies for each category to deliver maximum value from the supply base in the areas of cost and risk management, sustainability, innovation, and growth.
● Our Supplier Code of Conduct specifically covers this area. It is communicated to all current and new suppliers and we have already obtained agreement to its provisions from the majority of our key contracted suppliers.
● We operate a supplier sustainability programme, which has detailed questions on compliance with labour laws.
● We audit suppliers under PPD 017 which also covers this area.
● All outsourced manufacturing is required to undergo due diligence which includes screening, reputation monitoring and due diligence questionnaires.

C. Other Business Partners
Business partners that provide services to NSG Group are assessed to determine if they are an anti-bribery/anti-corruption (ABAC) risk. As with our suppliers, those meeting ABAC criteria undergo due diligence, assessment and reputational monitoring. This includes agents, consultants and joint venture partners.

Effectiveness of our Efforts
We use various methods to determine the effectiveness of our efforts to ensure slavery and human trafficking is not taking place in any part of our business or supply chains:

● Completion of internal audits by Group Internal Audit on minimum controls and compliance program requirements.
● Ethics & Compliance Hotline which is available to all NSG Group employees and third parties to report suspected violations of human rights. Reporters may be anonymous in most countries and all reporters are protected from retaliation in any form.
● Training of managers and staff on our Code of Ethics.
● Periodic review our policies and procedures to help maintain compliance with internal policy and external laws.

There have been no audit findings, due diligence findings or reported incidents of slavery and human trafficking within NSG Group or its supply chain to date.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group’s slavery and human trafficking statement for the financial year ending 31 March, 2018.

Shigeki Mori
President and CEO, NSG group
31 March 2018