



Thorlabs Modern Slavery Statement – 2026

Thorlabs Inc. and subsidiaries (“Thorlabs”)

Financial Year Ending 2026

This Modern Slavery Statement is made pursuant to:

- Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act
- Australian Modern Slavery Act 2018 (Cth)
- UK Modern Slavery Act 2015 (Section 54)

It outlines the steps taken by Thorlabs Inc. and its subsidiaries to prevent and reduce the risk of modern slavery, forced labour, and child labour in our operations and global supply chains.

1. Introduction

Thorlabs is committed to conducting business with the highest ethical standards. We maintain a zero-tolerance approach to all forms of modern slavery, forced labour, child labour and human trafficking in our operations and global supply chain.

This statement sets out the actions taken by Thorlabs during the 2025–2026 financial year to identify, prevent, and address modern-slavery-related risks across our operations and supply chain.

2. Structure, Activities, and Global Supply Chain

Thorlabs is a global photonics technology company providing optical and optoelectronic products for research, industrial, engineering, and medical sectors. Our operations span nine countries, including manufacturing, R&D, distribution, and sales sites.

Our supply chain is multi-tiered and includes suppliers of advanced materials, electronics, fibre-optic components, machined parts, precision assemblies, and specialised technologies. Thorlabs has a mix of local and global suppliers, from small businesses to multinational companies. We are not yet able to map our supply chain beyond our direct suppliers, but plan to improve this visibility in the coming year.

Additional information on our global locations is available at:

www.thorlabs.com/locations

This report was compiled by Thorlabs’ global compliance team. The global compliance team is responsible for assessing and responding to any risk identified within the supply chain which is not remediated by a corrective action plan.

3. Policies and Governance Framework

Thorlabs maintains a policy framework that reinforces our commitment to responsible business conduct.

3.1 [Thorlabs Code of Conduct](#)

Sets ethical expectations for all employees and contractors including explicit prohibitions on forced labour, child labour, and human trafficking. This code is aligned with laws and regulations including, among others, the Nations Universal Declaration of Human Rights, the Minimum Age Convention 138 and Worst Forms of Child Labour Convention of 182 of the International Labour Organization (“ILO”), the ILO Declaration of Fundamental Principles and Rights at Work adopted by the



International Labour Conference on June 18, 1998, the U.K. Modern Slavery Act, the U.S. Foreign Corrupt Practices Act, the U.K Bribery Act and the German Anti-Bribery laws.

3.2 [THORLABS GENERAL TERMS OF PURCHASE](#)

Requires suppliers to meet international labour standards and ensure safe, fair, and lawful working conditions.

3.3 [Whistleblowing Policy](#)

Provides a confidential mechanism for employees, suppliers, and third parties to report concerns about unethical behaviour, including suspected modern slavery.

These policies are communicated to all staff on recruitment, and to all suppliers are first engagement. Breaches of the policies are dealt with through disciplinary procedures in house and through corrective actions with suppliers.

These policies are periodically reviewed to reflect global regulatory expectations.

4. Risk Assessment and Due Diligence

Modern-slavery-related risks vary across geographies, sectors, and tiers within our supply chain. Thorlabs uses a risk-based approach incorporating the following elements:

4.1 Risk Mapping

Thorlabs Procurement and Compliance teams assess suppliers annually based on jurisdictional risk and industry exposure, using desk-based research and key sources such as US State Department Annual Trafficking in Persons (TIP) Report and Global Slavery Index.

Several upstream sectors integral to Thorlabs' products—electronics, mining, and metals processing—are globally recognised as carrying heightened forced-labour exposure, including risks linked to complex subcontracting and opaque deeper tiers of supply chains. Our analysis identifies Asia-Pacific, Africa, and the Middle East as high-risk regions due to factors such as weak governance, conflict, poverty, and dependence on migrant labour.

The highest-risk stage of the supply chain is raw-material extraction, where visibility is most limited and where conditions such as debt bondage, forced overtime, document retention, and reliance on unregulated labour brokers are most likely to occur.

These risks are particularly pronounced where recruitment is conducted through labour intermediaries, where supply chains involve informal or subcontracted labour relationships, or where workers originate from vulnerable populations such as migrants, minorities, or refugee groups. Factors such as poverty, limited worker protections, and restricted freedom of movement in certain regions intensify these vulnerabilities.

4.2 Supplier Audits

We conduct targeted audits focusing on labour practices, recruitment fees, document retention, working conditions, subcontracting, and grievance access. Corrective action plans are required where risks are identified.

5. Actions Taken and Remediation Approach

5.1 Preventive Actions

During the reporting year, we:

- Delivered targeted training to procurement, supply chain, human resource, and operational teams.
- Updated internal guidance to reflect evolving enforcement expectations.
- Undertook enhanced audits in selected high-risk regions.

No incidents of modern slavery have been identified in the supply chain.

5.2 Remediation of Identified Risks

Where concerns are identified through audits, grievances, or screening:

- Thorlabs collaborates with suppliers to implement corrective actions
- May suspend or terminate supplier relationships where non-compliance persists
- Ensures no retaliation against affected workers

5.3 Loss-of-Income Remediation

Thorlabs' approach to address loss of income to vulnerable families where child labour is identified includes:

- Working with local organisations to support access to schooling
- Providing transitional income restoration measures where appropriate
- Ensuring no punitive or harmful impact on affected families

6. Training and Awareness

Thorlabs provides ongoing modern-slavery training for teams in procurement, supplier management, human resources, operations, and logistics. Training includes:

- Recognising indicators of modern slavery
- Understanding recruitment-related risks
- Escalation channels and whistleblowing resources

Our training includes a mix of internally developed and external training resources.

7. Assessing Effectiveness

We evaluate the effectiveness of our approach through:

- Audit findings and closure rates
- Supplier-risk score improvements
- Tracking training completion
- Reviewing whistleblowing data
- Annual policy effectiveness reviews

8. Consultation with Subsidiaries

During the preparation of this statement, Thorlabs:

- Engaged regional leadership teams across all subsidiaries
- Reviewed subsidiary-specific risk profiles
- Sought input on supply-chain insights, local risk factors, and audit outcomes
- Ensure alignments of group-led policies with subsidiary operations.

9. Mandatory Publication and Submission Requirements

To comply with jurisdiction-specific obligations:

This statement will be:

- Submitted to the Minister of Public Safety through the Government of Canada reporting portal
- Submitted to the Australian Modern Slavery Statements Register
- Published on Thorlabs' website

9. Looking Ahead

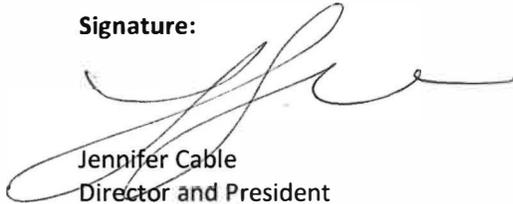
Over the 2026–2027 reporting period, Thorlabs will:

- Expand training programmes to reach key suppliers.
- Deepen supplier audits in high-risk regions
- Improve supply-chain traceability tools
- Strengthen remediation frameworks
- Continue aligning with global due-diligence developments.

10. Approval

This statement has been approved by the Board of Directors of Thorlabs Inc. on March 17, 2026.

Signature:



Jennifer Cable
Director and President
Thorlabs Inc.