

Slavery and Human Trafficking Statement

OKI Europe Limited (“OEL”) is committed to acting ethically and with integrity in all business dealings and relationships and improving its practices to combat slavery and human trafficking.

1. Overview of our business and supply chain

1.1 OKI Europe Limited, is a subsidiary of OKI Electric Industry, Co., Ltd. (“OKI”), a manufacturer and provider of technology products, solutions and services, headquartered in Tokyo, Japan. OKI operates in over 120 countries around the world and more detailed information of OKI and its subsidiaries (“OKI Group”) can be found on the following website: <http://www.oki.com/en/profile/>

1.2 OEL is engaged in the business of the supply of printing equipment. More information can be found on our website:

<http://www.oki.com/eu/>

1.3 OEL purchases finished products, parts, components and materials for its products from various suppliers in and outside Japan. OKI is OEL’s main supplier, who are based in Japan. OEL has other sources for products and parts including Toshiba. In addition, OEL has various suppliers for packaging and cable management including Polaris Plastics, Smurfit Kappa and Volex.

2. Policies to combat Modern Slavery and Human Trafficking

2.1 Committed to corporate social responsibility (“CSR”), OKI established the OKI Group Charter of Corporate Conduct (“Charter”) as a statement of values for the entire OKI Group to fulfil social responsibilities. This Charter clearly articulates “Respect for Human Rights” as one of its most important values.

<http://www.oki.com/en/profile/conduct/charter.html>

2.2 OKI Group also established the OKI Group Code of Conduct. This code emphasises respect for human rights in all aspects of OKI’s business activities and specifically prohibits child and forced labour. As a member of the OKI Group, OEL has adopted this Code of Conduct.

2.3 In May 2010, OKI signed and became a participant of the United Nations Global

Compact. The OKI Group has embraced the Global Compact's 10 principles, and will work to contribute to creating a sustainable society.

http://www.oki.com/en/ir/finance/library/ar2016pdf/16_31.pdf

As a member of the OKI Group, OEL embraces the Global Compact's 10 principles and in particular principles four and five aimed to prohibit all forms of forced and compulsory labour including the abolition of child labour.

2.4 Based on the Code of Conduct and the policies set out above, OEL has adopted an anti-bribery and corruption policy which takes a zero-tolerance approach to bribery and corruption. This incorporates compliance with the Foreign Corrupt Practices Act 1977 and the Bribery Act 2010.

2.5 For its global supply chain, OKI Group also established OKI Group Procurement Policies in which it requests all suppliers to comply with laws and regulations including the prohibition of child labour and forced labour.

<http://www.oki.com/en/procure/>

3. Due Diligence Processes

3.1 OEL carries out a risk based due diligence assessment on potential business partners before they are appointed to check that they conduct themselves in an ethical and responsible manner. This includes screening on a third party compliance data base where the business partners are assessed on a wide range of topics including child labour, human trafficking and modern slavery.

3.2 Upon identification of any alerts during the screening, OEL conducts an in-depth assessment to determine the nature and severity of the issues raised and depending on what is found OEL decides whether or not to appoint the business partner.

3.3 The evaluation of potential business partners is not a one-time check but a continuous process. OEL monitors its business partners regularly to ensure ongoing compliance with OEL's ethical standards and address any new issues that may arise during the business relationship.

4. Measures implemented by OKI Group Companies

- 4.1 All employees complete an annual declaration confirming compliance with OEL policies.
- 4.2 OEL Policies are reviewed annually, with any changes approved by the Board of Directors, and published centrally.
- 4.3 One of the measures OEL has implemented to ensure compliance is the adoption of the Right to Speak Policy which includes a non-retaliation statement.
- 4.4 The Right to Speak Policy is supported by a whistle blowing hotline which is operated by an independent third party. The hotline encourages employees to anonymously report violations of any OEL policies or the law including suspicion of slavery. Victimization of someone for raising a genuine concern is a disciplinary offence, which may be grounds for dismissal.
- 4.5 As to the OKI Code of Conduct including the respect for human rights, OKI Group has been working to implement the Code through various means including training programs.
- 4.6 OEL applies Corporate Social Responsibility, as directed by OKI Group who base their CSR philosophy on ISO26000, which is a guide to Corporate Social Responsibility launched by the International Organisation of Standardisation. The ISO26000 aims at harmonising corporate social responsibility across international organisations and companies to ensure better conditions for employees and customers.
- 4.7 OKI Group considers that potential risk of modern slavery and human trafficking occurring is higher in its supply chain than in its own group companies. OKI Group has therefore been promoting procurement activities in line with the concepts of CSR ("CSR Procurement") based on the "OKI Group Procurement Policies." This guide explains OKI Group's CSR initiatives and prohibits its suppliers from using child labour and forced labour.

<https://www.oki.com/en/sustainability/social/procure/>

5. Future Steps

OEL respects human rights and will continue to work towards eradicating slavery and human trafficking in its supply chain, and will continue to work diligently on the matter.

This statement was approved by the Board of Directors of OEL as of 25 April 2024.



Takaaki Hagiwara
Managing Director
OKI Europe Limited