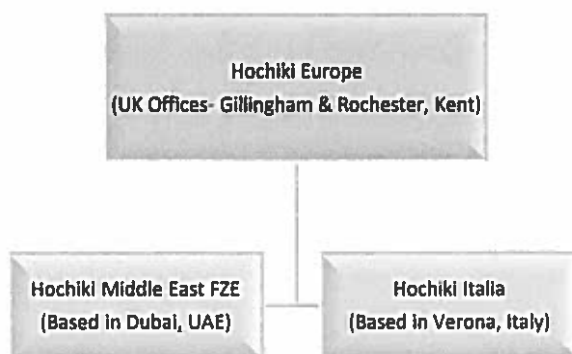


MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

A) ORGANISATION

This statement applies to all companies within and associated to Hochiki Europe UK Ltd (referred to in this statement as 'The Group'). The information included in the statement refers to the financial year April 2019- March 2020

B) ORGANISATIONAL STRUCTURE



Hochiki Europe is part of the Hochiki Europe group of businesses. The organisation is controlled by a Board of Directors.

The Head office for Hochiki Europe is in Gillingham, Kent, United Kingdom.

The organisation performs the sale of the aforementioned goods within the UK, Europe, The Middle East, Africa and India. Demand for our product is consistently high throughout the year and is therefore not seasonal.

The labour supplied to Hochiki Europe in pursuance of its operation is carried out in the United Kingdom, Europe, The Middle East, Africa and India. The sales office, supply chain and distribution are all carried out from the United Kingdom.

C) DEFINITIONS

The Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

Hochiki Europe acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Hochiki Europe does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Hochiki Europe in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, Europe, The Middle East, Africa and India and in many cases exceeds those minimums in relation to its employees.

E) SUPPLY CHAINS

In order to fulfil its activities, Hochiki Europe's main supply chains include those related to the supply of finished goods and components from various suppliers in the United Kingdom, Japan, America, China and mainland Europe. These supply chains are multi-tiered, with first-tier suppliers managing contractual relationships with lower-tier suppliers.

F) POTENTIAL EXPOSURE

Hochiki Europe considers its main exposure to the risk of slavery and human trafficking to exist within its sub-tier supply chains, where there is the potential to involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, Hochiki Europe considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, Hochiki Europe has taken steps to ensure that such practices do not take place in its business, nor the business of any organisation that supplies goods and/or services to the Company.

G) STEPS

Hochiki Europe carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a regular review of the controls of its suppliers.

Hochiki Europe has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Company has taken the following steps to ensure that modern slavery is not taking place:


- Vendor Assessments and Re-Assessments - the Company performs thorough checks on potential and existing suppliers, to determine due diligence in relation to slavery and human trafficking in its business and supply chains
 - Policy - Employees have an obligation to familiarise themselves with our procedures, to support the prevention of modern slavery and conduct business in a manner which ensures modern slavery is prevented
 - Whistleblowing - Hochiki Europe is committed to conducting its business with honesty and integrity, encouraging employees to report any issues in confidence, with the assurance that they will be investigated, with appropriate action taken
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H) KEY PERFORMANCE INDICATORS

Hochiki Europe has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Hochiki Europe or its supply chains.

- Vendor performance –Hochiki Europe undertakes supplier audits to assess performance and compliance. Audit findings are recorded and tracked through to completion

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Signed.....

[Director]