

## Slavery and Human Trafficking Statement

### 1. About our Statement

Under the Modern Slavery Act 2015 of the United Kingdom (the “Slavery Act”), this statement sets out the steps that Yazaki Corporation (“Yazaki”) and its group companies (collectively, “Yazaki Group”) have taken to ensure that modern slavery and human trafficking is not taking place in any of its own business and supply chain. The period covered by this Statement shall be Fiscal Year 2023 (Yazaki: 21<sup>st</sup> June 2023 – 20<sup>th</sup> June 2024; Yazaki Europe Middle East Africa N.V. and its subsidiary undertakings, Yazaki Europe Limited (“YEL”) inclusive, (“Yazaki EMEA”): 1<sup>st</sup> April 2023 - 31<sup>st</sup> March 2024).

Yazaki Group is totally opposed to modern slavery and human trafficking in its own business and its supply chains as a whole.

Yazaki’s understanding of modern slavery and human trafficking is based on the definitions set out in the Slavery Act.

Yazaki, Yazaki EMEA and YEL will jointly prepare and publish this statement for Yazaki Group, including its European companies. In disclosing the statement, the Boards of Directors of Yazaki and Yazaki EMEA, and Directors of YEL have recognized the content of this statement as efforts to respect human rights in the supply chain of their products and confirmed the human rights issues identified by each company. Since Yazaki EMEA is the direct parent company of YEL, YEL’s actions are included under Yazaki EMEA’s actions.

### 2. Our Organizations’ Structure and Business (the data as of June 20th, 2024)

Yazaki Group’s core business is built around the manufacturing and sale of automobile parts. In addition, Yazaki Group manufactures and sells power cables, air conditioning equipment, gas equipment, etc.

Yazaki, with its registered head office in Tokyo, has operational world headquarters facilities in Susono City, Shizuoka prefecture, Japan. Yazaki Group has 140 companies, operating in 46 countries and regions. Yazaki Group’s total global employment amounts to approximately two hundred thirty thousand people. Yazaki Group develops its market on large regions of Europe, Asia, North, Central and South America and Africa. Yazaki Group’s business in the UK is operated by Yazaki EMEA, having its head office in Oudsbergen, Belgium, and YEL, having its office in Basildon, the United Kingdom.

### 3. Our Supply Chain

Yazaki Group purchases parts/materials for its products from various suppliers in and outside of Japan.

Yazaki Group requests all first-tier suppliers in its supply chain to take appropriate steps based on the relevant policies stated below. Additionally, to influence further throughout the wider supply chain, Yazaki Group encourages not only our first-tier suppliers, but also second-tier

suppliers and onward related to the transactions between Yazaki Group and first-tier suppliers, to apply such policies through the first-tier suppliers. Yazaki Group considers that it mitigates modern slavery or human trafficking risk in our whole supply chain.

#### **4. Yazaki's Relevant Corporate Policies**

##### Overall View

Yazaki prepares and distributes relevant policies for Yazaki Group to its executives, employees and suppliers to ensure that modern slavery and human trafficking is not taking place in any part of its business or supply chain. These policies are drafted by the appropriate divisions in charge and presented to the Boards of Directors and other executive meetings. Once adopted, they are delivered to relevant divisions and employees in Yazaki Group.

For instance, Yazaki Group's relevant global policies include:

- Yazaki Group Human Rights Policy (English Edition and Japanese Edition)
- CSR Policy (English Edition and Japanese Edition)
- YAZAKI Global Responsible Mineral Policy (English Edition and Japanese Edition)
- Code of Conduct (English Edition and Japanese Edition)
- Supplier CSR Guidelines (English Edition and Japanese Edition)

##### Yazaki Group Human Rights Policy

The policy sets out Yazaki Group's fundamental policy on respect for human rights and declares to fulfill its responsibility to respect human rights through support and respect for international human rights norms, such as the International Bill of Human Rights (the Universal Declaration of Human Rights and the International Covenants on Human Rights with the First and the Second Optional Protocols to the International Covenant on Civil and Political Rights) and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as implementation of the UN Guiding Principles on Business and Human Rights ("UN Guiding Principles").

Yazaki Group Human Rights Policy is placed above its all other relevant policies and documents which refer to respect for human rights, such as the CSR Policy, YAZAKI Global Responsible Mineral Policy and the Code of Conduct.

Yazaki Group Human Rights Policy applies to Yazaki Group's all companies and their executives and employees to conduct necessary actions to prevent human rights infringement, and it requests Yazaki Group's suppliers and other stakeholders to endorse it and endeavor to respect human rights.

##### CSR Policy

Yazaki Group conducts its business activities along with Fundamental Management Policy in order to realize the Yazaki Group Corporate Policy "A Corporation in Step with the World" "A Corporation Needed by Society". Based on the Fundamental Management Policy, Yazaki Group established the CSR Policy which explains Yazaki Group's roles and responsibilities to meet the

expectations of the various stakeholders. The CSR Policy also comprises human rights related matters such as "Compliance with Laws and Regulations", "Responsible sourcing", "Respect for Human Rights", "Safe and Healthy Work Environment" and "Talent Development". Our goal is to contribute to the sustainable development in the society by listening to the voices of our stakeholders and reflecting this policy in our daily operation through business activities. In order to reflect a proactive corporate perspective aimed at realizing a sustainable society, beyond the traditional framework of CSR, the contents of this policy have been revised and has been renamed the "Sustainability Policy", following the approval of Yazaki's Board of Directors in August 2024.

#### YAZAKI Global Responsible Mineral Policy

Yazaki established Yazaki Global Responsible Mineral Policy to avoid the use of minerals derived from all human rights violations including child labor and other social issues in high-risk areas (CAHRAs-Conflict Affected and High-Risk Areas), including the Democratic Republic of the Congo and adjoining countries.

Based on this policy, we strive to fulfill its responsibilities as a company by responding to the growing social demand for procurement, such as the Dodd-Frank Act in the United States, the EU Conflict Minerals Regulation, and the OECD Due Diligence Guidance for Responsible Business Conduct. Specifically, in cooperation with suppliers and several industry association, we investigate smelters which produce the minerals (i.e., tin, tantalum, tungsten, gold, cobalt and mica) used in our products and promote initiatives to use smelters that comply with the audit program of the Responsible Mineral Initiative (RMI), that is an international organization that promotes responsible mineral procurement. Also, as a member of the RMI, we cooperate to its promoting activities of responsible mineral procurement.

#### Code of Conduct

Yazaki Group prepared a handbook regarding the Code of Conduct for its executives and employees in a form appropriate to the laws, regulations and customs of each country and region. In line with the aforementioned CSR Policy, the handbook covers relevant sections such as "Compliance with Laws and Regulations", "Responsible sourcing", "Respect for Human Rights", "Safe and Healthy Work Environment" and "Talent Development". Among others, the "Respect for Human Rights" section sets out that executives and employees should pay careful attention to ensure forced labor and child labor are not taking place in Yazaki Group's business. The handbook also contains the fundamental management policy and the CSR Policy based thereon, and Yazaki Group's executives and employees are expected to act consistently in accordance with such rules.

The Yazaki EMEA Code of Conduct is applicable to Yazaki Group companies in EMEA region and their executives and employees in the region and sets out the expected ethical behavior and conduct when doing business. The Code of Conduct requires not only that companies in the region comply with national laws and regulations, but also that all executives and employees are aware of and comply with applicable laws and regulations as their personal responsibilities.

The Code of Conduct thereby encourages all executives and employees to deal more ethically and honestly with their business partners and aims to strengthen the relationship of trust with all stakeholders, such as local communities and authorities. The Code of Conduct, in conjunction with the CSR and the Human Rights Policy, will help Yazaki EMEA to ensure a workplace where everyone can share a sense of ownership for Yazaki success by creating an atmosphere defined by a performance-based culture and strong teamwork.

The Code of Conduct includes a dedicated item on the respect for human rights as part of the section on Yazaki EMEA's responsibility as a member of society. This item stipulates Yazaki EMEA's endeavor for the prevention of forced labor and child labor.

In doing so, the Code of Conduct supports executives and employees of Yazaki EMEA in protecting human rights, by acting in a socially responsible manner as well as ethically and in compliance with all applicable laws and internal rules, including those directed at ensuring Compliance with the UK Modern Slavery Act.

The Code of Conduct is published on the internal and external website to ensure that it is accessible to all stakeholders. ([https://www.yazaki-europe.com/fileadmin/user\\_upload/Yazaki\\_Europe\\_Code\\_of\\_Conduct\\_20210922.pdf](https://www.yazaki-europe.com/fileadmin/user_upload/Yazaki_Europe_Code_of_Conduct_20210922.pdf)).

### Supplier CSR Guidelines

The Supplier CSR Guidelines cover relevant matters such as compliance with laws and regulations, respect for human rights, prohibition of forced labor or child labor, and ensuring safe and healthy work environment. The Supplier CSR Guidelines require the relevant suppliers to comply with the Supplier CSR Guidelines and other matters agreed with Yazaki Group, as well as to promptly report any violation or suspected violation of the Guidelines or the agreements.

In addition, in order to clarify the policy for response to human rights issues such as forced labor and child labor in the supply chain, Yazaki Group is utilizing the Supplier CSR Guidelines reiterating its human rights related policy and requesting suppliers to further enhance and strengthen their CSR initiatives.

In line with the aforementioned Supplier CSR Guidelines, Yazaki EMEA has reworked and improved the previous "Supplier Code of Conduct" by replacing it with "Yazaki EMEA Business Partner Code of Conduct". The Business Partner Code of Conduct has been completely re-designed and is based on latest expectations and requirements by society, applicable laws and regulations, and best practice. The reworked Business Partner Code of Conduct dedicates one chapter to the holistic sphere on human rights and encompasses all related topics, including modern slavery and human trafficking. The Business Partner Code of Conduct is being cascaded to our suppliers and has been integrated in our purchasing processes and standards for passing-on requirements from our customers to our suppliers as part of our supply chain management activities. To ensure full transparency, also for potential new suppliers, on expectations being a trusted business partner, the Business Partner Code of Conduct is also publicly available in the supplier portal and is accessible via: <https://www.yazaki-europe.com/supplier>

## Whistleblowing System

Yazaki Group has an internal policy applied globally to describe requirements of whistleblowing system. Along with this policy internal whistleblowing system has been established in each region, through which employees are able to report any irregularities or illegal activities in the company. Yazaki Group has also set up whistleblowing contact points at external law firms, which are guaranteed to be independent, but in regions where such external contact points have not been set up, Yazaki Group recommends that it should be set up. Yazaki Group also set out a system of protection for whistleblowers in the internal policy to ensure that they remain anonymous and are not subject to retaliation or other detriment for reporting. In Japan in FY2023, the operational method was revised such as making the internal whistleblowing system known and issuing FAQ, based on the survey for employees. In addition, with the aim of early detection and prevention of serious legal violations, Yazaki Group decided to implement a "global whistleblowing system" which enables overseas employees to directly report to Yazaki as the world headquarter. Preparation such as surveys of legal regulations in the regions that are to be implemented prior to the other regions and development of the global whistleblowing system's internal policies are in progress.

Yazaki EMEA operates a holistic "Whistleblowing System" that is accessible both to internal and external individuals on its website to raise any (potential) violations against the Code of Conduct or laws and regulations, either anonymously or by name. Amongst various categories to report, in particular this includes the opportunity to receive reports by employees and business partners on legal violations, including violations of human rights, and acts of modern slavery and human trafficking. Through the "Whistleblowing System", Yazaki EMEA has endeavored to identify, investigate and correct human rights violations in its supply chain and beyond. In FY 2023, Yazaki EMEA has initiated a Whistleblowing System Improvement Project to ensure compliance with applicable laws and regulations.

In FY2023, all Yazaki Group did not receive any reports on violations, in relation to modern slavery and human trafficking.

## **5. Risk Assessment and Due Diligence**

Yazaki Group is operating a human rights due diligence system for all aspects of human rights, such as prevention of child labor and forced labor. Specifically, each of Yazaki Group's locations conducts an annual assessment of human rights-related risks and inspection of the status of mechanisms in place to reduce these risks and the appropriateness of business operations. The results of these assessments and inspections are reported to the Internal Control Committee established in each region, which deliberates on the appropriateness and sufficiency of risk responses and corrective measures and monitors the status of responses.

In FY 2023, following the previous financial year, human rights risk assessments were conducted in each region. Based on the results of the risk assessment, the identified risks and their countermeasures were reported in the Regional Internal Control Committee. Monitoring was also executed in the committee. Also, in the Global Internal Control Committee, which

regional representative entities gather, implementation status of risk assessment and existence of risks were shared. We will continue our efforts to reduce risks on a global basis.

In addition, in order to ensure that child labor does not occur at its own locations, Yazaki Group conducts surveys on compliance with international norms and national laws and regulations regarding the minimum age for employment in the countries and regions where its companies are located, and monitors the status of its response. In FY2023, the survey was conducted for 94 companies, and no problems were found in any of them. We will continue to check the status of compliance.

Furthermore, as part of its human rights due diligence, including the supply chain, Yazaki Group is using the aforementioned Supplier CSR Guidelines and their monitoring tools to assess the human rights risks of its suppliers, monitor their efforts to reduce these risks, and implement corrective action. In FY2023, with the result of human rights due diligence conducted last fiscal year, based on the supplier's self-assessment result in ASEAN and China, on-site interview was executed to the suppliers for which our deeper observation was needed. In the on-site interview, we grasp the supplier's situation correctly and promote the understanding of the importance of responding to human rights-related risks. With regards to human rights due diligence including the supply chain, we will consider improving the process and tools as preparation towards the human rights due diligence planned in the following years in Japan, ASEAN, and China. As for other regions, we will proceed with discussions with the local staff members regarding the introduction and expansion.

Yazaki EMEA proceeded with performance on risk management activities to address risks, including human rights. These activities include measures at all locations to reduce risk through improvements in day-to-day management, as well as annual assessments of the status of these measures and the existence of significant risks. Yazaki EMEA conducts risk activities in relation to manage major legal risks, including modern slavery and human trafficking on a continuous basis with the management team. This includes continuous ad-hoc management reports in case of any potential concerns and bi-annual risk assessments and reports to the Yazaki EMEA Internal Control Committee (YEMEA ICC).

The above risk management activities are supplemented and completed by continuous legal monitoring, e.g. applicable EU legislation such as the EU Corporate Sustainability Due Diligence Directive and related requirements with expected impact on Yazaki EMEA's risk management in its entire supply chain. Yazaki EMEA will implement necessary internal controls as appropriate to manage such risks.

In FY2023, Yazaki EMEA conducted activities to ensure managing, assessing and continuously monitoring supply chain requirements and risks by a more systematic and technology based approach, that also includes measures to identify and assess the human rights risks of its suppliers. These initiatives will support meeting regulatory requirements and a data driven reporting and decision-making in the area of supply chain risk management.

## **6. Effectiveness and Performance Review**

With regard to the aforementioned human rights due diligence, Yazaki Group conducted risk assessments and confirmations of the sufficiency and appropriateness of operations and management in all global locations in FY2023. Although there were no significant risks as a result, we confirm with the relevant corporation the details of concerned matters and methods of prevention, followed by monitoring the implementation status.

In addition, survey of the minimum age for employment was conducted in 45 countries and regions where Yazaki Group's companies are located, including Europe, to confirm the minimum age for employment and penalties under the laws and regulations of each country, the existence of birth certificates, and the existence of rules based on the laws and regulations of each country, and to confirm that there is no significant risk of child labor.

As result of the human rights due diligence on suppliers, it became clear that there are no significant risks through the supplier's self-assessment and on-site interview. Moreover, we promote understanding of human rights risks and issues and encourage further improvements at suppliers. We are also communicating with suppliers to discuss the importance to reach out to tier 2 and beyond suppliers.

Yazaki EMEA is in the process of integrating its human rights due diligence framework with the aforementioned risk management activities to address human rights risk in order to make them more comprehensive and effective. In this process, Yazaki EMEA is ensuring that the integrated human rights due diligence process and scope meet the requirements of relevant laws and regulations.

In FY 2023, the human rights due diligence questionnaire has been amended with additional questions, based on continuous improvement activities within Yazaki, and has been implemented at 33 locations in 19 countries under Yazaki EMEA. On the basis of this assessment, no specific violations in particular in relation to modern slavery and human trafficking were identified to the time of reporting. Any potential issues will be reported to the Yazaki EMEA ICC and the Global Internal Control Committee, as the basis for continuous improvement to risk mitigation and prevention of modern slavery and human trafficking.

## **7. Training and Awareness**

Yazaki Group uses the aforementioned Code of Conduct or similar documents for various internal training programs to endeavor to ensure that management and employees are aware of and understand the content of the Code.

For example, we report the latest trends in human rights as well as human rights due diligence results of Yazaki Group's locations and suppliers to the Global Internal Control Committee which our executives attend. Introduction of human rights frameworks and explanation about human rights risks such as forced and child labor in the supply chain, with the aim of deepening understanding of respect and consideration for human rights, has been conducted at CSR training sessions for managers, new recruits, mid-career hires and

employees prior to being transferred overseas. Additionally, in Japan, training through quizzes were conducted to employees by asking them CSR related questions including human rights topics when they start up their computers in order to make importance of respecting for human rights and our initiatives known. Yazaki Group also provides its suppliers with opportunities to explain Yazaki Group's CSR Policy and annual procurement policy, and regularly explains the requirements based on these policies, in order to share and deepen the understanding of both parties.

Same as in previous business years, Yazaki EMEA will continue to further promote and raise awareness of the Code of Conduct among all executives and employees in Europe and to carry out related educational initiatives.

This Statement was reviewed and approved by Yazaki Corporation's Board of Directors on September 26th, 2024, and Yazaki Europe Middle East Africa N.V.'s Board of Directors on September 27th, 2024 and Yazaki Europe Limited's Directors on September 26th, 2024.

September 26<sup>th</sup>, 2024



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Riku Yazaki  
President, Representative Director  
Yazaki Corporation

September 27<sup>th</sup>, 2024



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Munenori Yamada  
Chairman of the Board of Directors  
Yazaki Europe Middle East Africa N.V. ,

September 26<sup>th</sup>, 2024



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Hans Lemmens  
Director  
Yazaki Europe Limited