

## **Slavery and Human Trafficking Statement**

We are committed to acting ethically and with integrity in all business dealings and relationships and improving our practices to combat slavery and human trafficking.

### **1. Overview of our business and supply chain**

1.1 Our company, OKI Europe Limited (“OEL”), 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/printing/services-and-solutions/case-studies/case-studies-products/colour-multifunction/index.html>

1.3 OEL purchases finished products, parts, components and materials for its products from various suppliers in and outside Japan. OKI Data Corporation is OEL’s main supplier, who are based in Japan. OEL has other sources for products and parts including Toshiba. In addition, we have various suppliers for packaging and cable management including Polaris Plastics, Express Corrugated Cases 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 the 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 labor. 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 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](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 labor and forced labor.

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

### **3. Measures implemented by OKI Group Companies**

<http://www.oki.com/en/csr/csreact/compl/sc.html>

3.1 All new employees are given a standard manual setting out all mandatory policies and each year they are required to sign an annual declaration confirming compliance. One of the measures OKI has implemented to ensure compliance is the adoption of the Right to Speak policy including a whistle blowing hotline. This is operated by an independent third party and supported by a non-retaliation statement. The hotline will encourage employees to anonymously report violations of our policies or the law including suspicion of slavery. Victimization of someone for raising a genuine concern is a disciplinary offence and dismissal.

3.2 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.

3.3 OEL has been working with Save the Children to improve the literacy skills and to aid career prospects for children and provide equal opportunities. We are working together with Save the Children to increase the number of children's books and reading clubs, set up by teachers and parents. This programme aims to help over

16,000 children in conflict-affected areas to receive education.

3.4 OEL is dedicated to Corporate Social Responsibility, which is shown by compliance with 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

3.5 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 labor and forced labor.

[http://www.oki.com/en/procure/pdf/csrguide\\_201404.pdf](http://www.oki.com/en/procure/pdf/csrguide_201404.pdf)

Since 2014 OKI Group has been conducting surveys on overseas suppliers using this guide.

#### **4. 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 28 April 2020.



.....  
Tsukasa Takasawa  
Managing Director  
OKI Europe Limited