

# **HAMAMATSU PHOTONICS UK LIMITED**

## **MODERN SLAVERY POLICY**

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## **1. Introduction**

The Modern Slavery Act 2015 deals with tackling human trafficking and slavery and introduces an obligation on companies to be more transparent in their dealings (including within their supply chains). Modern Slavery is a crime resulting in objectionable abuse of human rights. It could be manifested in different ways such as slavery, servitude, forced or compulsory labour and human trafficking.

## **2. Our commitment**

Hamamatsu Photonics UK Ltd is committed to social and environmental responsibility and has zero tolerance for slavery and human trafficking. The company is also committed to acting ethically and with integrity and transparency in all of its business dealings and relations by enforcing effective systems and controls to ensure that the modern slavery and human trafficking are not taking place anywhere either its own business or in any of its supply chains.

The directors and the senior management team at Hamamatsu Photonics UK Ltd are fully committed to the implementation of the requirements of the of Modern Slavery Act 2015. The management team have day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

We follow the values of a family enterprise, and we will be honest, fair and trustworthy in all our activities and relationships. We ensure to foster an atmosphere where fair employment practices and a safe workplace extend to every member of our diverse workplace. Our company values outline our expectations of the ethical conduct for all employees.

## **3. Our business structure**

Hamamatsu Photonics is a leading provider of cutting-edge photonics technology and products. With 70 years of experience, the company delivers innovative solutions to customers across a wide range of industries, including medical, scientific research, industrial, and telecommunications. Hamamatsu Photonics offers a comprehensive range of products, such as imaging sensors, light sources, and optical systems designed to meet customers' unique needs.

Hamamatsu Photonics employ over 5,700 employees in offices around the world. We manufacture and sells such equipment and apparatuses as well as delivers integrated solutions encompassing end products, services and components. Details of our company and business information can be found on the "Corporate Information" page of the Hamamatsu's website: <https://www.hamamatsu.com/eu/en/our-company/corporate-profile.html>.

As part of our commitment to combatting modern slavery and human trafficking, we have developed and maintain internal policies and procedures to reinforce our approach. These documents are designed to be easy to use and are intended to assist our employees in their due diligence of suppliers. In addition, we have a publicly available [Code of Conduct](#), which sends a clear message to our employees, business partners, stakeholders, and investors of our business principles and ethics. The Code of Conduct includes the section of “Human Rights and Diversity” where we clarify our stance against forced labour and child labour not only with respect to Hamamatsu, but also our suppliers and business partners.

#### **4. Supplier adherence to our values**

We operate our business in compliance with applicable laws and regulations and we expect our suppliers to do the same, including the laws against modern slavery. Our expectations are set out in our Code of Conduct for Representatives and Suppliers.

In addition, we endeavour to include a provision within our purchase contracts with our suppliers, whereby suppliers are asked to warrant that in performing their contractual obligations they will ensure that they and their sub-contractors shall:

- comply with all applicable laws, statutes, regulations and codes relating to modern slavery, anti-bribery and anti-corruption, including but not limited to the Modern Slavery Act 2015, the Bribery Act 2010 and Hamamatsu Photonics UK Ltd Code of Conduct for Representatives and Suppliers;
- take reasonable steps to ensure that there is no slavery, human trafficking, bribery or corruption in their business or supply chains and that they have and maintain their own policies and procedures; and
- to promptly notify Hamamatsu Photonics UK Ltd as soon as they become aware of any actual or suspected slavery, human trafficking, bribery or corruption in their business or supply chains.

Hamamatsu Photonics UK Ltd aim for a consistent approach when working with suppliers and that ethical trading considerations remain a critical factor when choosing our supply base and approval process.

#### **5. Due diligence**

We are committed to acting ethically and with integrity in all our business dealings and to putting in place effective systems and controls which aim to ensure modern slavery is not taking place anywhere in our own business or in our supply chains. As part of this commitment, we focus on the welfare and safety of individuals at potential risk, undertake periodic due diligence reviews of our key suppliers and, where appropriate, provide support and guidance to help suppliers to address any concerns that they might have in their own business and supply chain.

In the UK, all personnel working for the company are required to supply relevant and up to date legal documents to provide proof of eligibility to work in the UK and age on the commencement of employment.

## **6. Training and awareness**

We consider it important to raise awareness and increase sensitivity on human rights risks among employees in order for our company to respond to human rights issues including modern slavery and human trafficking.


All existing staff are issued with an updated copy of the Employee Handbook as and when it is reviewed, and all new starters receive a copy as part of their induction.

## **7. Our effectiveness in combating slavery and human trafficking**

To date, we have not identified any current suspected incidences of modern slavery in our supply chains.

We constantly strive to improve our systems and processes to ensure that modern slavery is not present in our supply chain or within our business. Our Board-level Sustainability Committee provides a direct overview of our Environmental, Social, and Governance (“ESG”) agenda. Modern Slavery prevention is one of the key areas under the Social section of the ESG agenda. To drive further progress in this area, we have taken the following actions:

We revised and republished our Whistleblowing Policy in February 2024, reissuing it digitally to all employees and is included in our Employee Handbook. We also ensure new employees receive a copy as part of their onboarding with Hamamatsu Photonics.

A handwritten signature in black ink that reads "Tim Stokes". The signature is stylized, with a large, looped initial "T" and "S".

Tim Stokes  
Managing Director

Hamamatsu Photonics UK Ltd