



## **Modern Slavery & Human Trafficking Statement**

### **1. Introduction**

This statement sets out the steps we, JAE Europe Limited (JAE EU), have taken as a business to combat and eradicate issues relating to modern slavery and human trafficking both within our organisation and in our supply chain.

We recognise that the issues surrounding modern slavery and human trafficking are always changing and evolving and so we continue to strive to improve our processes, policies, rules and requirements to tackle these issues.

We are committed to upholding the highest of standards to remove modern slavery and human trafficking.

Our ethical policies are at the heart of everything we do and we have a zero tolerance approach to modern slavery and human trafficking. This applies to employees, workers, contractors, suppliers and agents.

### **2. Organisational Structure**

We are a supplier of technology solutions and have successfully established 3 strong products lines in Connectors, User Interface Solutions and Aerospace. We form part of a group of companies all acting in the same sectors.

JAE EU's parent company is Japan Aviation Electronics Industry, Limited (JAE HQ). JAE HQ have its headquarters in Tokyo, Japan and within the group have over 9787 employees worldwide, while JAE EU itself employs 77 permanent staff as of 31<sup>st</sup> March 2024.

For more information on JAE HQ corporate data see the following website pages:

- [Corporate Data | Company - Japan Aviation Electronics Industry, Ltd.](#)
- [Corporate Profile | Company - Japan Aviation Electronics Industry, Ltd.](#)
- [Business Overview | Company - Japan Aviation Electronics Industry, Ltd.](#)

### **3. Our Business**

JAE EU's core business activities center as a Sales/Distribution and Marketing/Engineering office and are segmented into business units such as:

- Automotive, Industrial and Multimedia Connectors & Harnesses,
- Aerospace Sensors

Along with supporting functions such as Corporate Planning, Finance, HR, IT, Operations (including program management, project management and Quality), Supply Chain/Purchasing and associative office administration and compliance functions.

### **4. Our Supply Chains**

JAE EU does not directly manufacture any of its products. JAE EU purchases and supplies products that have been manufactured directly within the JAE Group or its partners. JAE EU purchases its manufactured products from seven manufacturing entities within the group, these are JAE HQ, JAE Philippines, JAE Tijuana, JAE Oregon, JAE Wuxi, JAE Wujiang, JAE Taiwan and 3rd party assembly partner in Serbia. JAE EU completes its due diligence to ensure that these companies abide by the modern slavery act 2015 and are audited frequently to ensure compliance through a rigorous audit process either from a group perspective or localised actions.



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Within a thriving office/sales based environment, JAE EU has a number of other suppliers to perform its operations efficiently. These suppliers will be supplying items such as stationery, food and beverages, furniture and office supplies, however, since FY22 (April 2022-March 2023) JAE EU offices within Europe have been under-utilised due to JAE EU continuing various health and safety protocols in relation to Covid 19 and otherwise. JAE EU currently operates a hybrid working pattern with 3 days working from home basis per week.

### 5. Our adherence to JAE-HQ Corporate Policies on Slavery and Human Trafficking

JAE EU is committed to ensuring that there is no modern slavery or human trafficking in our supply chain (operational and logistics structure) nor in any part of our business.

JAE EU does not specifically have a localised Anti-slavery policy, however, we are wholly committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain or business.

For the purposes of aforesaid, JAE EU actively monitors and observes various JAE HQ corporate policies and guidances, these can be found at the following website pages:

- Basic policy for procurement | Procurement | Company- Japan Aviation Electronics Industry, Ltd.
- Sustainable Procurement Guideline | Procurement | Company- Japan Aviation Electronics Industry, Ltd.
- JAE Group Responsible Minerals Procurement Policy | Procurement | Company- Japan Aviation Electronics Industry, Ltd.

JAE EU in particular operates in strict accordance and compliance with JAE's Charter of Corporate Behaviour and JAE Commitment to Respect for Human Rights. See some of the relevant sections of such policies which have been included in paragraphs 5.1-5.7 below";

#### 5.1. Elimination of Discrimination and Inhumane Treatment

- (1) We do not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards and access to training.
- (2) We do not conduct medical tests or physical exams that could be used in a discriminatory way.
- (3) We strive to prevent inhumane treatment of workers in the workplace, including any sexual harassment, abuse, corporal punishment, verbal abuse or mental or physical coercion. The work regulations define the requirements, types and procedures of disciplinary punishment with regard to these matters, which are communicated to all employees.

#### 5.2. Prohibition of Child Labour

- (1) We do not employ any person under the minimum age for employment stipulated by law in the country, under the age for completing compulsory education or under the age of 15, whichever is greatest.
- (2) We do not have workers under the age of 18 perform work that is likely to jeopardize their health or safety, pursuant to the laws and regulations in the country.
- (3) As for student workers who work in internship and other positions while studying at educational institutes, we appoint qualified trainers and managers, manage and maintain student records in accordance with the applicable laws and regulations and provide appropriate support and training.

During FY23 JAE EU did not employ/hire or engage in any activities with a child (or young person) under the age of 18. JAE EU supported 1x Internship for a work related study. Activities were risk assessed, supervised and monitored by the sponsored University and various internal management members.



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### 5.3 Prohibition of Forced Labor

- (1) We do not use forced or bonded labor, involuntary or exploitative prison labor or labor obtained through slavery or trafficking of persons. (This includes transferring or receiving persons by means of threat, abduction, fraud, etc.)
- (2) The written employment agreement describes the terms and conditions of employment in a language that is understood by employees.
- (3) We do not confiscate or deny access by employees to their original identity documents, such as government-issued identification or passports.
- (4) We do not request employees to pay the company's or agents' recruitment fees or other related fees for their employment.

### 5.4 Appropriate Working Hours

We comply with the laws and regulations in the country pertaining to working hours and manage the working hours so that they do not exceed the maximum set by the local law.

### 5.5 Proper Wages

- (1) We comply with the laws and regulations in the country pertaining to the payment of wages. We guarantee legally mandated minimum wages and compensate employees for overtime at pay rates greater than regular hourly rates.
- (2) We inform all employees of the wage system and payment period through wage rules or by other means. As for compensation paid to individual employees, we provide wage statements that allow them to verify accurate compensation for work performed.
- (3) We do not perform deductions from wages due to pay cut as a disciplinary measure.

### 5.6 Freedom of Association

In accordance with the laws and regulations in the country, we respect the right of all employees to form and join trade unions and bargain collectively by their free will. Employees and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, intimidation, reprisal, etc.

### Due diligence processes and risk assessment

The predominant part of JAE EU's supply chain is the logistics and supply/demand planning of products sold by JAE EU to its customer base. All products are manufactured either within the JAE group or assembled / manufactured by a single 3<sup>rd</sup> party partner (as described above) and so our activities as an office based sales environment are considered to be of lower risk in respect of modern slavery and human trafficking matters. The companies follow a stringent risk assessment of a company before dealing with them, and performs regular audits to ensure compliance.

All JAE group companies and 3<sup>rd</sup> party localised partner are subject to the corporate policies as described and listed throughout this statement. All members associated to JAE EU are held to the same high standard when it comes to ensuring that modern slavery and human trafficking plays no part in any of JAE's activities, including those that supply parts and materials to JAE's group companies to implement the same standard.

In recognition of the importance which JAE EU places on eradicating issues of modern slavery and human trafficking in respect of its workforce, JAE EU monitors and undertakes periodic reviews of its employee's working hours and annual salaries for benchmarking purposes. This is to ensure not only that all relevant and applicable modern slavery and human trafficking laws are fully adhered to, but also that JAE EU remains fair and competitive in the markets in which it operates.

## 6. Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking.

If any of our third party suppliers are found to be in breach of any rules or regulations relating to modern slavery and human trafficking or do not adhere to the standards we set, we will attempt to assist them to rectify the



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issue and if there is a major breach, we will consider terminating the legal and commercial relationship with that business. Persistent breaches by any of our third party suppliers will also be treated seriously and again we will consider terminating the relationship in such instances.

All JAE manufacturing sites are accredited to ISO9001:2015 as a minimum or the higher IATF 16949:2016 standard. Sites producing automotive components are accredited to the higher IATF 16949:2016 standard.

To retain this accreditation, all sites & their associated remote functions & sales offices (JAE-EU included) are subjected to regular audits (both internally & from the external Certification Body) to ensure we comply with the required standards.

These standards relate to many best practice operational, systematic and people related processes, e.g. working conditions, resource planning, managing work-loads for employees, motivating employees and training/skills requirements for efficiencies.

In addition, many sites at which the JAE Group manufacture products are accredited to ISO14001 which is an environmental standard.

As a group, JAE is continually striving to improve its systems and processes to ensure there is no presence of any issues relating to modern slavery and human trafficking.

### 7. Training

We have implemented a system whereby all new employees of JAE EU are notified of the obligations imposed on them relating to modern slavery and human trafficking and we are committed to continually reviewing all and any methods, controls or otherwise that we have in place for the purposes of improvement. All new employees are directed to materials of all of JAE Group's policies which relate to them via JAE.Com website and JAE EU Intranet, including those listed in this statement. Employees are expected to read and adhere to those policies and raise any comments or questions they have.

This statement is made by JAE EU pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> March 2024.

JAE EU Board of Directors has approved this statement.

A handwritten signature in black ink that reads 'Koichi Tomizuka'. The signature is written in a cursive style with a horizontal line underneath the name.

Koichi Tomizuka, **Managing Director**  
JAE Europe Limited