

## **Modern Slavery Act Statement**

### **Nidec Industrial Automation UK Limited (the “Company”) – Slavery and Human Trafficking Statement for the period beginning on 1 April 2019 and ending on 31 March 2020 (“FY2019”)**

The UK Modern Slavery Act 2015 (the “Act”) came into effect on 29 October 2015. The Act requires any commercial company, including manufacturers carrying on a business or part of a business in the UK, which supplies goods and/or services and which has an annual turnover in excess of £36 million, to disclose information regarding its policies and the steps it has taken to eradicate slavery and human trafficking within its own business and from its supply chain.

This Slavery and Human Trafficking Statement (the “Statement”) is made pursuant to Section 54, Part 6 of the Act with the purpose of clearly setting out the steps the Company has taken to ensure that slavery and human trafficking are not taking place in the Company’s supply chains and/or in any part of the Company’s business.

#### **Company Business and Supply Chain**

The Company plays an active role to promote (i) a robust supply chain and (ii) supplier development and awareness through its Supplier Code of Conduct and the Nidec Group Supply Chain CSR Guidebook (collectively, the “Code”). The Code clearly communicates the Company’s expectations with regards to third parties that the Company works with in the supply chain domain (“Suppliers”). Suppliers have a responsibility to adhere to the Code and to promote human rights within their own supply chains. The Company has worked actively within FY2019 with respect to ensuring compliance by all Suppliers with the Code. During this period, 100% of the Company’s Suppliers positively acknowledged the Company’s Code and committed to comply with its principles or provided evidence that they had their own similar code and policies that they comply with.

The Company makes it a part of its fundamental policy to comply with all the rules and regulations promulgated under the Electronics Industry Code of Conduct (“EICC”), which covers both slavery and human trafficking, and expects its Suppliers to do the same.

#### **The Code, Terms of Purchase and Business Ethics Policy Forbidding Slavery and Human Trafficking**

The Code expressly refers to the Nidec Group Corporate Social Responsibility Charter and more specifically to: ethical behaviour, anti-corruption, conflicts of interest, conditions of employment, discrimination, freedom to associate, humane treatment, child labour, working and living conditions, environment, management systems and supply chain management.

In addition, the Company issues purchase orders to its Suppliers that incorporate the Company’s General Conditions of Purchase (“Terms of Purchase”). The Terms of Purchase expand on the Company’s expectations of Suppliers and Suppliers’ obligations in relation to specific topics. The Terms of Purchase govern the majority of purchases by the Company of goods and services from its Suppliers. Under the Terms of Purchase the Company reserves the right to terminate its relationship with a Supplier if non-compliance with the Company’s Code and Terms of Purchase is discovered and/or such non-compliance is not addressed in a timely manner.

The Company has adopted the Nidec Group Compliance Code of Conduct and an Employee Handbook on Business Ethics Policy, collectively, the “Compliance and Ethics Policies” which sets out the Company’s ethical standards and which detail and promote the Company’s expectations of its employees to comply with such standards. The Compliance and Ethics Policies apply to the Company’s employees and operations, but the Company encourages businesses throughout its supply chain and sales network to adopt and enforce similar policies in their own operations.

#### **Slavery and Human Trafficking**

“Slavery” can take many forms, including but not limited to, human trafficking and child labour. The Company complies with all applicable laws and employment regulations and does not engage in child labour, forced labour or human trafficking. The Company conducts regular internal training on its Compliance and Ethics Policies with its employees in the form of an annual ethics training programme and additional ad hoc compliance training for

certain customer- and supplier-facing employees. The Company expects its Suppliers to comply with all applicable laws and employment regulations and not to engage in child labour, forced labour or human trafficking. The Company's Code clearly states that the Company does not tolerate slavery in the Company's supply chain and operations. Although during FY2019 the Company was not able to conduct audits to ensure that all of its Suppliers comply with the Code and the Terms of Purchase, a significant number of Suppliers have committed to compliance with the principles of the Company's Code.



Approved by: Anthony Pickering  
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