### Modern Slavery Act Transparency Statement for Year Ended March 2022

"As a company trusted by society, we will constantly pursue innovation, inspiring people everywhere, and creating a future full of smiles." — This Seiko Holding Group Purpose guides actions and decisions of all Seiko Group companies.

We are committed to strictly comply with all laws, regulations and international norms, including Universal Declaration of Human Rights and ILO Declaration on Fundamental Principles and Rights at Work. Seiko explicitly prohibits all forms of human and labour rights abuses and takes appropriate steps to ensure that modern slavery and human trafficking is not taking place in our supply chains or in any part of our business.

#### **Our Business Structure**

This statement is published on behalf of Seiko UK Ltd. – the wholly-owned UK subsidiary of Seiko Watch Corporation ("SWC"), a Japanese company which is engaged in product planning, manufacturing, and sales of watches for domestic and overseas markets. The parent company of SWC, Seiko Holdings Corporation ("SHD") is headquartered in Tokyo, from where it coordinates the activities of all consolidated companies, i.e. manufacturing, distribution and sales of watches, electronic devices, system solutions, clocks, luxury accessories and other products.

Seiko UK Ltd. controls the UK marketing, sales and service activities for the SWC brands – Grand Seiko, SEIKO, and LORUS — as well as the distribution of clocks, printers, musical accessories and other products, supplied by Seiko Group companies - SWC, Seiko Clock (Hong Kong) Ltd., and Seiko Instruments Inc. Most of these products are manufactured by SWC and Seiko Epson Corporation ("SE").

# **Our Supply Chain**

SWC and SE manufacture watches distributed by Seiko UK Ltd. They are manufactured in Japan (by both SWC and SE), China (by SWC), and Thailand (by SE).

The suppliers of components for SWC products sold in the UK are located in Japan and China, while those of SE are based in Malaysia, Singapore and China. The most frequently procured goods include metal parts and circuit components.

Clocks, printers, musical accessories and other products which occupy only a small share in the total turnover of Seiko UK Ltd. are supplied by Seiko Clock (Hong Kong) Ltd. and Seiko Instruments Inc.

#### **Our Policies**

We established Seiko Holdings Group's Sustainability Policy. In this policy, we will actively address social issues such as human rights, and contribute to the realization of a world where more people can live comfortable, authentic lives, secure in body and mind. In addition, Seiko UK Ltd. has issued the Employee Guide, stipulating the rules that aim to ensure ethical behaviour of all employees. The Guide is accompanied by the Harassment Policy and Procedures, which prohibit all forms of physical, sexual or mental harassment, and Procedures for Disclosure of Information, describing the steps to report violations of corporate ethics, including human rights abuses.

## Steps to Prevent Modern Slavery and Human Trafficking

Seiko UK Ltd. validates the results of due diligence processes, carried out by its suppliers and manufacturers, SWC and SE.

## (1) Measures taken by SWC

The measures taken by SWC to prevent human rights abuses, including modern slavery and human trafficking, are described below.

The SWC Group implements its original Supplier Certification System, which covers law compliance, protection of human rights, environmental management, risk management and other criteria to be met. Through this system, potential suppliers of the SWC Group are asked to answer self-assessment questionnaires which include questions regarding the violation of human rights such as unfair labour and conflict minerals. The SWC Group conducts businesses only with suppliers who are adequately certified upon assessment.

These measures are designed to ensure that modern slavery, human trafficking or other human rights abuses are not taking place in the supply chains of Seiko UK Ltd. and SWC. The executives of all operating companies are required to familiarize themselves with the Seiko Group companies' Law Handbook, which clarifies their authorities and obligations related to the management of legal risks. All concerns related to law violations or corporate misconduct can be lodged through an anonymous whistleblowing system.

### (2) Measures taken by SE

The SE Group also carries out measures to prevent the use of modern slavery by engaging in activities such as supplier due-diligence and monitoring. For further details, please see the link below.

Modern Slavery Act Statement for SE

https://corporate.epson/en/sustainability/ourpeople/pdf/fy21\_modern\_slavery\_act\_statement.pdf

## **Training**

Seiko Group companies require all employees and executives to complete business ethics training and compliance training, as well as to familiarize themselves with all relevant laws and regulations, including those pertaining to human rights. Additionally, we, Seiko UK Ltd., conducts all employee training which contribute to the prevention of modern slavery.

This statement was approved by the Board of Seiko UK Ltd. on 30st September 2022

David Edwards

Managing Director

Electronically signed 30st September 2022