

**COMPLIANCE STATEMENT FOR THE MODERN SLAVERY ACT 2015
covering the year 1 April 2022 to 31 March 2023**

Approved by the Board of Annodata Limited on 27 April 2023.

1. Organisation structure and supply chains

Annodata Limited is committed to ensuring good labour practice along its entire supply chain. Annodata is a provider of Managed Services, covering Document and Content Management, Unified Communications and ICT. Annodata Limited is a subsidiary of KYOCERA Document Solutions Inc, a global corporation with headquarters in Japan. Annodata’s main business is the supply and servicing of printer hardware manufactured by its parent company, together with the sale of consumables, accessories and software associated with these products and a portfolio of content management, Unified Communications and ICT hardware and services.

KYOCERA Document Solutions Inc. owns and operates its own factories according to the KYOCERA Philosophy and in line with the principles of the UN Global Compact on Human Rights. It follows the KYOCERA CSR Guidelines as its code of conduct for business activities throughout the Group, which includes commitments to respect the human rights of employees and to eliminate forced labour and child labour. This provides a high level of confidence that there are no human rights violations at the manufacturing stage of the largest part of Annodata’s supply chain.

Annodata has a long history of working with a carefully selected group of business partners in order to provide its services and associated products to its customers. All of Annodata’s main suppliers of hardware products are reputable international companies themselves with their own modern slavery act controls.

Aside from the products for resale supplied by its parent company, Annodata’s supply chain primarily provides office consumables and services, in most cases via resellers.

2. Policies in relation to slavery and human trafficking

Annodata manages its business according to the KYOCERA Philosophy, and in line with the 10 principles of the UN Global Compact on Human Rights, of which KYOCERA Corporation is a signatory.

To address the risk of modern slavery and other human rights and environmental concerns, during 2022, KYOCERA Document Solutions Inc. aligned its Supply Chain CSR Procurement Guidelines with the Responsible Business Alliance (RBA) code of conduct (see here <https://www.kyoceradocumentsolutions.com/en/social/partners/index.html>) which is issued to all major suppliers. This provides them with guidance about the prohibition of child, bonded slave or forced labour.

Kyocera Corporation itself adheres to 18 of the UN’s International Labour Organisation Conventions in the manufacture of its products. These include the conventions on forced labour (C029 & C105).



Annodata has a set of Supplier Social responsibility guidelines which all selected suppliers confirm their agreement with before we procure from them and includes the following statements:

Human rights and working conditions

- We respect human rights.
- We respect the rights of our employees and are committed to combating any form of abuse or harassment. We encourage the creation of an attractive and motivational working environment by endeavouring to achieve a free exchange of opinion and information with our employees.
- We respect the right of our employees to form associations.
- We condemn forced labour and child labour.
- We condemn unfair and discriminatory treatment.
- We comply with minimum wage legislation.

We also monitor emerging risks and changes in the working conditions of our employees. We run internal training programmes and adapt working practices and policies to make sure that we are keeping up with the latest requirements.

3. Due diligence processes

Annodata asks all new suppliers, at the point of appointing them, to ensure that the CSR policies of suppliers of products and services to Annodata are aligned with the KYOCERA CSR Guidelines, including the prohibition of forced, bonded and child labour.

Employees have access to a number of “speak-up” channels to report wrongdoings, including cases of mistreatment of other employees.

Checks we carry out as part of our employee onboarding process would uncover practices typically associated with modern slavery such as the retaining of passports.

In addition, we are members of the UK National Living Wage Foundation to ensure our employees to receive the appropriate compensation to live in the UK.

Our parent company and largest product supplier KYOCERA joined the Responsible Business Alliance (RBA) during 2021 and had the working conditions in one of its main factories in Vietnam audited by the RBA with no findings of concern. Work is underway to complete a successful audit at the main factory in China. Over 740 of KYOCERA’s major suppliers inside and outside Japan are also required to complete self-assessment questionnaires on their compliance with the Supply Chain CSR procurement guidelines.

4. Risk assessment and management

Most of the services Annodata procures are in highly skilled areas, where the risk of modern slavery practices is low. We have identified a potential source of modern slavery risk in relation to temporary staff hired to work in our warehouse. We address this risk by only working with reputable and known agencies for the supply of these workers and checking right to work documentation for all temporary staff.



The greatest risk of slavery and human trafficking in Annodata's supply chain lies in the procurement of print and ICT hardware. In this area the greatest risk lies in the raw materials stage.

As Annodata's largest supplier, KYOCERA relies on third party suppliers of the materials and components contained in its products. KYOCERA's manufacturing arm concludes a written pledge with suppliers which includes requesting them to immediately notify it when they find any conflict minerals in their supply chain. Since 2013 KYOCERA has been conducted annual surveys of suppliers using the Conflict Minerals Reporting Template (CMRT) created by the Conflict-Free Sourcing Initiative (CFSI), an international project that addresses the issue of conflict minerals.

The second largest risk of modern slavery in the print and ICT hardware supply chain relates to employees in electronic and electrical component manufacturing. Here KYOCERA uses its supplier survey and Supply Chain CSR Procurement Guidelines with suppliers to manage the risk of modern slavery. For other ICT suppliers, Annodata's request to all suppliers to confirm adherence to the CSR guidelines helps to manage this risk.

5. Key performance indicators to measure effectiveness of steps being taken

During 2022/23 we had an objective for all of our staff to be trained in Modern Slavery Risk, which we achieved. We will continue this goal during 2023/24, to ensure that all members of staff across the organisation receive refresher training in Modern Slavery Risks.

During 2022/23, Annodata did not find any ILO indicators of forced labour inside the company or its supply chain.

6. Training on modern slavery and trafficking

KYOCERA carries out training of the manufacturing supply chain in relation to labour conditions. During 2022/23, we rolled out a refresher training course on Modern Slavery Risks to all directly employed staff. All employees are also made aware of the "speak up" channels, which they can use to flag any issues on a regular basis.

Signed:

Rod Tonna-Barthet

Rod Barthet
Managing Director
Annodata Limited
28 April 2023