



ANNODATA LIMITED

# MODERN SLAVERY STATEMENT 2024

Covering Financial Year 2023/24 (1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024)

**annodata**  
A KYOCERA GROUP COMPANY

## **COMPLIANCE STATEMENT FOR THE MODERN SLAVERY ACT 2015**

COVERING FINANCIAL YEAR 2023/24 (1 APRIL 2023 TO 31 MARCH 2024)

This statement has been approved by the Board of Annodata Limited through formal resolution.

### **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. Where Annodata supplies third party products, the main suppliers of these 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.

### **1. 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, since December 2021, KYOCERA Document Solutions Inc. aligned its Supply Chain CSR Procurement Guidelines with the Responsible Business Alliance (RBA) Code of Conduct, which was subject to further update in May 2024.

More information relating to these guidelines can be found here:

<https://www.kyoceradocumentsolutions.com/en/social/partners/index.html>

Within our supply chain we share our Supplier Code of Conduct, which ensures that no supplier shall support or participate in modern slavery, including human trafficking and child labour,

warranting that obligations to minimum wages are met. This aligns to contractual provisions, with any breach leading to immediate termination of the business relationship.

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).

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 needs of our employees, regulatory bodies and other stakeholders are being met.

## 2. DUE DILIGENCE PROCESSES

Annodata asks suppliers 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. These requirements are underlined within our Supplier Code of Conduct, which acceptance is mandatory for all new and renewed supplier engagements.

Employees have access to various "Speak-up" channels to report impropriety and breach of law, without fear of retaliation, as protected under UK and EU law. These include reporting cases of mistreatment of other employees and contractors. Provisions are made to ensure that potential conflict of interest or undue influence do not adversely impact willingness or capability to report.

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 work with recognised bodies, such as the UK National Living Wage Foundation, to both acknowledge and support 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, who have audited working conditions within Kyocera's factories, ensuring they meet the require standard for membership, which can be verified at the following address:

<https://www.responsiblebusiness.org/about/members>

## 3. RISK ASSESSMENT AND MANAGEMENT

Most of the services Annodata procures are in highly skilled areas, where the risk of modern slavery practices is low.

In our day-to-day operations, we continue to manage perceived high risks of modern slavery to the business, particularly through its supply chain. We address this risk by only working with reputable and known agencies for the supply of these workers, ensuring they are paid in accordance with the UK National Living Wage and checking right to work documentation for all temporary staff.

As a result of our 2023/24 risk assessment, we have sought specific assurances from suppliers relating to cleaning and warehousing, where there is an enhanced risk of exploitation of labour that necessary governance is in place to protect people working under theirs and Kyocera's duty of care.

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, which is governed by KYOCERA Document Solutions Inc.

Annodata 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.

#### **4. KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN**

During 2023/24 we had an objective for all of our staff to be provided training in Modern Slavery Risk, which we achieved. We will continue this goal during 2024/25, to ensure that all members of staff across the organisation receive refresher training in Modern Slavery Risks.

During 2023/24, Annodata did not find any ILO indicators of forced labour inside the company or its supply chain.

#### **5. TRAINING ON MODERN SLAVERY AND TRAFFICKING**

Annodata carries out training of the manufacturing supply chain in relation to labour conditions, with all staff required to complete training identifying Modern Slavery Risks. 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  
Chief Executive Officer  
Annodata Ltd

30<sup>th</sup> September 2024