

# Modern Slavery Act Transparency Statement

## Hitachi High-Tech Europe GmbH Modern Slavery Act 2015 Statement for the year ending 31 March 2024

Hitachi High-Tech Europe GmbH recognises the importance of identifying and preventing modern slavery and its causes in our business and supply chain. This statement, made pursuant to Section 54(1) of the Modern Slavery Act 2015, sets out the steps we have taken to prevent modern slavery and human trafficking in our business and supply chain in the year ending 31 March 2024, as well as our plans for the current year. It covers Hitachi High-Tech Europe GmbH only. For other Hitachi Group company statements please see the relevant company website or visit [www.hitachi.eu/en-gb/modern-slavery-act](http://www.hitachi.eu/en-gb/modern-slavery-act).

### **Our Business**

Hitachi High-Tech Europe GmbH is part of the Hitachi Group and is a wholly owned subsidiary of Hitachi High-Tech Corporation in Japan. Our business in Europe is headquartered in Krefeld, Germany, with additional offices in Mannheim (Germany), Vélizy (France), Rotkreuz (Switzerland), Milano (Italy), Maidenhead (UK), Daresbury (UK), and Wolfsgraben (Austria), which are involved in sales and service.

Our business in Europe employs 139 people. We ensure that all employees are able to demonstrate their eligibility to work in the country in which they are based and require all contractors and agency staff to undertake the same before starting work with Hitachi High-Tech Europe GmbH. We had a turnover in the 2023/2024 financial year of approximately KEUR 943.638 / KGBP 807.349.

### **Operations**

Our European business offers products, which are mostly manufactured by Hitachi High-Tech Corporation and is organized into five product groups:

1. Nano Technology Solution Business (electron microscopes, semiconductor equipment, battery cell manufacturing equipment);
2. Medical System (Clinical chemistry analysers, immunoassay analysers, clinical laboratory automation systems);
3. Supply & Value Chain Solution Business (SVCB) (diodes, magnetrons, HDD, polarizers, High Speed Data Transmitter and Receiver, Life Cycle Management Solution for Lithium-ion Batteries, local procurement of various materials);
4. Green Transformation Innovation Centre (GXIC).

### **Our Supply Chain**

Our business groups supply a variety of products and services under the Hitachi brand. We had 17 non-European suppliers (11 in Asia, 6 in USA and Canada). The majority in these areas are Hitachi Group companies. 59% of our suppliers are based in Europe (whereupon 18% in UK). Hitachi Group companies in Asia, primarily in Japan, manufacture the majority of the products supplied by us.

### **Our Approach**

We are committed to conducting business ethically and to minimising the risk of slavery or human trafficking in our own business and in our supply chains.

Our commitment and work are strongly supported by Hitachi, Ltd. In 2019, the Company signed the World Business Council for Sustainable Development's [CEO Guide to Human Rights](#) calling for CEOs to go beyond compliance to drive transformative change in corporate respect for human rights.

Additionally, at the beginning 2022 Hitachi, Ltd. joined Ethisphere's Business Ethics Leadership Alliance (BELA) a global community of governance, ethics, and compliance leaders collaborating to drive best practices.

In line with Hitachi's global human rights approach to create a value chain where the human rights of all stakeholders are respected, Hitachi High-Tech Europe GmbH seeks to work with suppliers that actively address modern slavery and to work collaboratively with those still developing their processes in this area. We also strive to engage employees in understanding why addressing modern slavery is important and how to identify and act on indicators of slavery.

Our three key areas of focus in addressing modern slavery so far have been (1) supplier engagement, (2) raising awareness and building expertise in Hitachi High-Tech Europe GmbH, and (3) collaborating with external organisations and stakeholders.

We acknowledge that we are on a journey and, in common with other companies, face challenges, which include engaging suppliers where we have low influence on and try to fully understand the sub-tiers of our supply chain. Therefore, we collaborate with external stakeholders and experts to overcome such challenges and ensure that our work is robust and effective.

### **Our Policies**

Our commitment to prevent modern slavery or human trafficking in our business and supply chains, is underpinned by appropriate policies which address issues relevant to slavery and human trafficking and are regularly reviewed and updated to reflect our evolving business.

- The Hitachi Group Code of Ethics and Business Conduct applies to all members of our governance and control bodies, executives, and employees. The Code of Ethics and Business Conduct is our guide to every day responsible behaviour and reflects our commitment to, amongst other things, respecting human rights, in particular hiring employees according to international standards and not engaging in child or forced labour. In addition, this code is accessible in multiple languages. Please visit: <https://www.hitachi.com/corporate/about/conduct/index.html>
- The Hitachi Group CSR Procurement Guideline. It specifically calls for freely chosen employment, appropriate working ages, working hours, wages, and benefits as well as humane treatment, non-discrimination, and freedom of association. Please visit: [https://www.hitachi.com/procurement/csr/EN\\_HG\\_SPG.pdf](https://www.hitachi.com/procurement/csr/EN_HG_SPG.pdf)
- The Hitachi Group Human Rights Policy sets out Hitachi's commitment to undertake Human Rights Due Diligence in accordance with the UN Guiding Principles to identify and address human rights issues, including those related to modern slavery. Please visit: [http://www.hitachi.com/sustainability/renew/pdf/human\\_rights\\_policy.pdf](http://www.hitachi.com/sustainability/renew/pdf/human_rights_policy.pdf)
- Our employment practices and procedures ensure fair recruitment and treatment of employees.
- The Hitachi Group written whistleblowing procedure encourages employees and third parties to report concerns of malpractice, including any concerns related to modern slavery and human trafficking issues. In addition, the Hitachi Group Whistleblowing Policy provides details of processes to be undertaken when a noncompliance is identified.

### **Our Progress to Date**

Over the last year,

1. We Rolled out a mandatory Hitachi Group Code of Ethics and Business Conduct training via our Global Ethics and Compliance programme; this includes modern slavery and human trafficking.
2. The Hitachi Group established a new Sustainability Promotion Meeting, with members that include the Chief Sustainability Officer, business promotion division heads at Business Units (BUs) and key Group companies, and RHQ Sustainability Officers, to discuss important measures concerning sustainability, and conduct monitoring of progress with Hitachi's Sustainability Road Map and in reaching its targets and objectives.
3. In addition, Hitachi Group set up meetings composed of responsible officers from individual Business Units, major Group companies and Regional Headquarters to consider Group-wide policies, share information and promote Human Rights Due Diligence (HRDD) best practices.
4. We participated in an information exchange on Human Rights Due Diligence amongst Hitachi companies headquartered and operating in Europe to discuss challenges and good practices.
5. Training - Employees: Hitachi High-Tech Europe GmbH ensured that all new employees undertake mandatory online Global Ethics and Compliance training, this included our Hitachi Group Code of Ethics and Business Conduct which contains training on modern slavery and human trafficking. This training is available in 15 languages and is refreshed annually for all employees to complete. The training explains how to spot and report potential or actual breaches of the Code and details the consequences for failing to comply with the Code.
6. Hitachi High-Tech Europe GmbH contracts require suppliers to comply with applicable laws. Hitachi High-Tech Europe GmbH suppliers are also required to adhere to our Code of Ethics and Business Conduct, which states the requirement to comply with applicable laws and ethical business conduct, including relevant laws and principles prohibiting involvement in human trafficking and slavery. Furthermore, the suppliers are required to comply with the Hitachi Group Supplier Code of Conduct, which prohibits Child labour, forced labour and slavery.


## **Our Future Plans**

Over the coming year and beyond we plan to focus on the following areas:

- The organisation's structure, its business, and its supply chains:
  - Strengthen visibility and reporting of workforce composition including the intersectionality of vulnerable groups (CSRD).
- Policies relevant to slavery and human trafficking:
  - Review and strengthen governance, risk, and compliance internal and external processes relevant to slavery and trafficking. Map and review existing governance, risk, and compliance processes to identify whether there is sufficient coverage (or gaps) of risks related to modern slavery. Increase the understanding of Hitachi's approach as set out in the Hitachi Group's Human Rights Policy with reference to drivers for implementing the UN Guiding Principles, such as the regulatory environment in Europe in relation to business and human rights including the UK Modern Slavery Act.
- Risk assessment:

- Commence a supply chain mapping exercise and analysis with focus on supply chain and business relationships to aid identifying areas of high risk. Commence deployment of the EcoVadis CSR & Sustainability Risk Assessment.
- Due diligence
  - Review, strengthen and develop strategy to reinforce Hitachi High-Tech's due diligence process (incorporating data, system, and our processes).
- Training:
  - Continue to develop, raise awareness, and build expertise on Human Rights and Human Rights Due Diligence. Continue to ensure that all our employees complete the mandatory modern slavery awareness training – specifically how to spot the signs and how to report, and our stance and policies.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Hitachi High-Tech Europe GmbH slavery and human trafficking statement for the financial year ended 31 March 2024. It has been approved by Hitachi High-Tech Europe GmbH's CEO.



Kazuyoshi Matsukaze  
President  
Date: 22-04-2024