



NEC EUROPE LTD

Modern Slavery and Human Trafficking

Statement 2024

About this statement

This Modern Slavery and Human Trafficking Statement (the "**Statement**")¹ is published by NEC Europe Ltd and refers to the requirements of Section 54 of the Modern Slavery Act 2015 ("**The Act**").

The Statement covers the organisation structure², business and supply chain of NEC Europe Ltd, its subsidiaries and branch offices, including NEC (UK) Ltd. (collectively "**NEC Europe**", "**the Company**", "**We**" or "**Us**")³.

The Statement outlines the steps that We have taken during the Financial Year that ended 31st March 2024 ("**Reporting Period**") to prevent any form of modern slavery and human trafficking from occurring within our organisation and supply chain.

NEC Europe

NEC Corporation⁴ is a global provider of technology products, services and solutions headquartered in Japan. The NEC Group consists of various companies headed by NEC Corporation, including all NEC companies referenced in this Statement.

The NEC Group promotes IT services, social infrastructure and other businesses based on its purpose "NEC creates the social values of safety, security, fairness and efficiency to promote a more sustainable world where everyone has the chance to reach their full potential."

For more information on the NEC Group's business, please see:

<https://www.nec.com/en/global/about/profile.html>.

NEC Europe Ltd⁵ is the regional headquarters of the NEC Group in the UK, and a wholly owned subsidiary of NEC Corporation. We are engaged mainly in a variety of B2B activities focused on business development, sales and marketing, and customer support to private and public organisations, including governments and local authorities, as well as research and development, in UK and Europe.

Governance

Senior Management of our Procurement, Sustainability and Human Resources review the implementation of modern slavery and human rights policies within the organisation and external supply chain. They report modern slavery and human rights matters to the Board of Directors to ensure that We maintain a well-grounded reputation for high standards of business conduct and good governance.

The Board of Directors of NEC Europe Ltd reviews and approves the Statement which is signed by the President and CEO of the Company on behalf of the Board.

¹ We published our first Modern Slavery Statement in 2016 and this is our 9th statement

² https://www.necuropecareers.com/content/NEC_in_your_Country

³ <https://uk.nec.com/>

⁴ <https://www.nec.com/>

⁵ <https://uk.nec.com/>

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Progress from previous years

The way we address progress over time is consistent with initiatives described in previous Statements.

Progress Goal	Results achieved
<p>Policies <i>Embed respect for human rights and zero tolerance of modern slavery within our organisation and throughout our supply chain.</i></p>	<ul style="list-style-type: none"> ▪ The President and CEO of NEC Europe and the senior management of NEC Europe have continued to promote the importance of compliance and responsible business behaviour through a variety of internal initiatives and the use of internal communication tools. ▪ We have communicated the NEC Code of Conduct, the NEC Group Human Rights Policy and our regional sustainability policies to our personnel and relevant business partners. These policies support the embedment of the respect for human rights and zero tolerance of modern slavery within our organisation and supply chain. ▪ We have reported progress on these policies, risk management and initiatives to the Directors on a quarterly basis.
<p>Due Diligence <i>Use of Safecall, other processes and mechanisms.</i></p>	<ul style="list-style-type: none"> ▪ We have used our internal purchasing decision-making tool when faced with multiple potential supply partners to support responsible purchasing decisions. ▪ We have applied NEC Corporation's guidelines and our own regional due diligence processes to identify and address potential negative impacts of our business requests and activities. ▪ We have engaged with our suppliers and reviewed their working activity to support them in reaching a level of compliance no less than those required by applicable laws ▪ We have requested five strategic suppliers to explain their supply chain practices as part of a global exercise led by NEC Group. ▪ We have promoted our outsourced whistleblowing service provider Safecall, which helps Us to establish a safe and confidential whistleblowing reporting system. ▪ We have brought together human rights, environment, information security, other corporate sustainability topics and developed joined actions with other NEC companies to improve our due diligence.
<p>Risk assessment <i>Progress in confirming compliance and the risks of forced labour in our organisation</i></p>	<ul style="list-style-type: none"> ▪ We have assessed our own activities in response to tenders and to support risk assessment initiatives with the NEC Group. ▪ We have reviewed about 170 new candidate suppliers against a questionnaire which We have previously developed internally considering legal requirements on human rights, modern slavery, International Reporting Standards and the 11 ILO indicators. ▪ Since 2021, 253 key strategic partners and approved suppliers representing 86% of our annual procurement spend have re-confirmed their understanding that the principles described in the NEC Group Guidelines for Responsible Business Conduct in Supply Chain are minimum requirements for continued business relationship with us. ▪ Our qualified third-party auditor conducted 58 unannounced health and safety on-site audits of suppliers across the first half of the Reporting Period, and one workplace visit. These audits have not revealed red flags of forced labour. The number of these audits was reduced significantly in the second half of the Reporting Period, corresponding to the sale of our Wireless Transport Business

Progress Goal	Results achieved
Effectiveness <i>Status of exposure to modern slavery risks</i>	<ul style="list-style-type: none"> Our requests for information on responsible business conduct were met by our existing suppliers, and We did not take any step to disengage with them. We have not received any forced labour claims through the normal grievance reporting process or Safecall. We believe that our exposure to modern slavery risks in our operations and supply chain remained low.
Training <i>Data pertaining to our sustainability training is above 95%.</i>	<ul style="list-style-type: none"> In 2023, We have rolled out an annual eLearning on Sustainable Procurement covering the risks of labour exploitation in supply chains for our purchasing specialists and other members of personnel, achieving a completion rate of 96%. We have invited 100% of personnel to take part to the annual NEC Compliance Day and Code of Conduct training.
Stakeholder engagement <i>Publish Statements on recognised websites that promote the fight against modern slavery and human trafficking as appropriate</i>	<ul style="list-style-type: none"> We have participated in several human rights events to maintain our awareness of new trends in due diligence. We have continued to be a signatory to the United Nations Global Compact ("UN GC") and reaffirmed our commitment to the 10 Principles. We have supported the UN GC Network UK as a member. We have published our Statement on our website and on the UK Modern Slavery Statement Registry.
Beyond legal compliance	<ul style="list-style-type: none"> We have promoted the benefits of inclusion and diversity and confirmed our stance against discrimination through a variety of company events

Organisation structure, business and supply chain

Our organisation and business

The Statement applies to NEC Europe companies listed in *Figure 1*. Other NEC Group Companies not listed in *Figure 1*, may publish a statement themselves or be covered by the NEC Group Modern Slavery Statement as applicable. Our operations outside the UK are in the European Union. Our organisation is summarised in *Figure 2*. *Figure 3* provides information on the revenue generated for NEC Europe Group by our strategic customers in context of human rights and/or modern slavery disclosure.

Figure 1

In UK	In the European Union
NEC Europe Ltd NEC (UK) Ltd.	NEC Deutschland GmbH; NEC Eastern Europe KFT.; NEC Finland OY; NEC France S.A.S.; NEC Iberica S.L.; NEC Italia S.p.A; NEC Laboratories Europe GmbH; NEC Nederland B.V.; NEC Portugal Telecomunicações e Sistemas, S.A. and NEC Scandinavia AB.

Figure 2

Company	Principal country of operation ⁶	Holding by NEC Europe	Contribution to NEC Europe Group Profit (Adjusted, £m FY23)	% of employees (NEC Europe total)
NEC Europe Ltd	United Kingdom	-	2.6	34
NEC (UK) Ltd.	United Kingdom	100%	0.3	5
NEC Deutschland GmbH	Germany	100%	7.3	19
NEC Eastern Europe KFT.	Hungary	-	-0.3	0
NEC France S.A.S.	France	100%	1.1	1
NEC Iberica S.L.	Spain	100%	0.7	13
NEC Italia S.p.A	Italy	100%	-0.1	8
NEC Nederland B.V.	Netherlands	100%	1.8	13
NEC Portugal Telecomunicações e Sistemas, S.A.	Portugal	100%	0.4	4
NEC Scandinavia AB.	Sweden	100%	1.0	3

Figure 3

We monitor the public declarations on human rights and/or modern slavery of our strategic customers.

Top 5 Customers	Headquarters location	% revenue generated for NEC Europe Group (NEC Europe total)	Public declaration on human rights and/or modern slavery
Customer A	Germany	22.9%	Yes
Customer B	Norway	8.6%	Yes
Customer C	Germany	7.0%	Yes
Customer D	UK	6.4%	Yes
Customer E	Spain	4.0%	Yes

Our Supply Chain

Our supply chain is mainly made of professional services providers and third-party providers of software, systems, products, components or solutions (“**technology partners**”).

⁶ Fixed Asset Investment in active operation

Figure 3 – Activity sectors of our services providers

The professional services that We use include administrative providers, consultants and advisors, from small to medium size or global reach with regional offices in the European Economic Area ("EEA")/UK

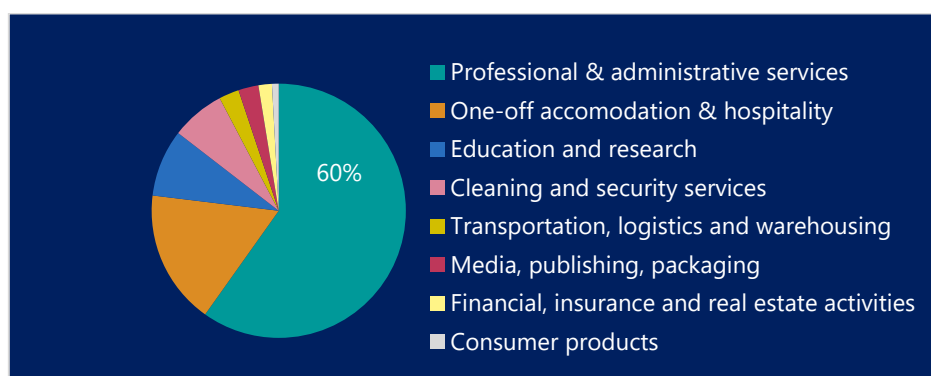


Figure 4 – Location of our top 5 regional technology partners

Our parent undertaking NEC Corporation⁷ manages the technology partners that are also in the supply chain of other NEC Group companies. These partners represent 35% of our total annual technology spend.

We only manage technology partners that are used by NEC Europe ("**regional technology partners**") and generally maintain with them long term relationships. None of these are operating from fragile and conflict affected countries or regions⁸ where the risks of human rights violations and modern slavery could potentially be more present. Our top 5 technology partners represent 54% of our total annual technology spend.

Regional Technology partners	Headquarters location	% Contribution to NEC Europe Group Spend (NEC Europe total)
Supplier A	Hungary	19
Supplier B	Taiwan	14
Supplier C	Germany	13
Supplier D	USA	5
Supplier E	USA	4

Policies in relation to slavery and human trafficking

NEC Europe has a "zero-tolerance approach" for any form of modern slavery including forced or

⁷ <https://www.nec.com/en/global/purchasing/index.html>

⁸ In reference to lists published by the OECD, the World Bank etc. and internal information.

compulsory labour, servitude, slavery and human trafficking. Our approach to addressing modern slavery and human trafficking risks sits within NEC Corporation's wider Human Rights agenda for the NEC Group.

NEC Group Policies

The NEC Group has placed the respect for human rights as one of the Principles of the NEC Way⁹ and in the NEC Group Code of Conduct¹⁰, which clearly states that each and every NEC Group officer and employee needs to comply with these principles.

In addition, the NEC Group upholds the International Bill of Human Rights, the International Labour Organization (ILO) Core Labour Standards, the UN Guiding Principles on Business and Human Rights (UNGPR), the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, the Ten Principles of the UN Global Compact¹¹ and other internationally recognised national laws and regulations in the relevant region.



The NEC Group Human Rights Policy¹², which states that where national laws in the relevant jurisdiction conflict with internationally recognized human rights We will seek ways to respect the principles of internationally recognized human rights, applies to all officers and employees of the NEC Group, including fixed-term contract employees, temporary employees, and part-time employees.

The NEC Group also encourages its suppliers, business partners, and customers to understand this Policy and share our commitment to respecting human rights. Furthermore, suppliers are required to comply with the "NEC Group Procurement Policy"¹³ and "Guidelines for Responsible Business Conduct in Supply Chains"¹⁴.

The NEC Group's Modern Slavery and Human Trafficking Statement can be found here:

<https://www.nec.com/en/global/csr/modernslavery/index.html>

The NEC Group ESG Databook¹⁵ can be found here:

<https://www.nec.com/en/global/sustainability/report/index.html>

⁹ <https://www.nec.com/en/global/about/the-nec-way.html>

¹⁰ https://www.nec.com/en/global/about/pdf/necway/nec_code_of_conduct.pdf

¹¹ NEC has been a member since 2005. The Ten Principles of the UN Global Compact are based on global agreements such as the Universal Declaration of Human Rights and ILO's Declaration on Fundamental Principles and Rights at Work and include items such as support for the protection, maintenance and respect for human rights, eradicate forced labour and ban child labour.

¹² https://www.nec.com/en/global/csr/pdf/human_rights_en.pdf

¹³ <https://www.nec.com/en/global/purchasing/renshiki-a2.html>

¹⁴ https://www.nec.com/en/global/purchasing/data/en2_sc_csr_guideline_4e.pdf

<https://www.nec.com/en/global/purchasing/sustainable.html>

¹⁵ This report covers the consolidated fiscal years that ended March 31, 2020, 2021, 2022 and 2023, unless otherwise noted.

NEC Europe Policies

In addition to complying with the Policies of the NEC Group mentioned above, We have several procedures and processes in place that integrate provisions in relation to human rights for our personnel, businesses partners, suppliers and other parties. These policies apply to all employees including temporary and agency employees. Most of our personnel are professionals or administrative workers in the UK or the EEA. There is no seasonality to working patterns.

Employment and labour policies.

The provisions of our labour policies include freedom of workers to terminate employment; freedom of movement; freedom of association; prohibition of any threat of violence, harassment, and intimidation; prohibition of the use of worker-paid recruitment fees; of compulsory overtime; of child labour; of discrimination; of the confiscation of workers' original identification documents; and the provision of access to remedy, compensation, justice for victims of modern slavery.

Other employment policies that We have implemented recognise the importance of helping our employees to balance their work and home life. Flexible smart working arrangements are in place where applicable. We promote work life balance and provide several wellbeing opportunities to our personnel. We don't wish to encourage employees to work excessive hours.

We are committed to the principle of Equal Opportunity in employment.

We recognise that We need the cooperation of our supply-chain partners and suppliers to contribute to the progression of respect for human rights in society. We therefore encourage them to understand and share our compliance commitments.

Responsible business policies

- These policies are reviewed and agreed by senior management on an annual basis.
 - Related provisions include responsible procurement, sustainability, health and safety, the provision of a safe and healthy environment, speaking up, due diligence and risk assessments.
 - They support our efforts to identify, mitigate and prevent the risks of child labour, forced labour and human trafficking to the best of NEC Europe's abilities.
-

An internal Whistleblowing Committee led by senior managers from Human Resources, Finance, Sustainability, Legal and Compliance is appointed to review, oversee, and monitor our whistleblowing program.

This program comprises safe, confidential and simple conduits for speaking up, the investigation of whistleblowing reports, the implementation of remedial actions, and the protection of employees from retribution in case they raise a concern about human rights issues.

Whistleblowing policy

- We use Safecall as our third-party confidential reporting line.
 - A specific section of our intranet is dedicated to information about Safecall and speaking up.
 - Workers in our operations can raise concerns including about modern slavery through our normal reporting process for grievance or through Safecall.
 - Suppliers can report any concerns relating to potential human rights breaches in such context via Safecall or via an internal responsible business contact option.
-

We announce, communicate and explain new policies to our personnel by internal means of

communication such as our intranet, compliance communications and training. Our responsible business policies are displayed in our offices where applicable.

Due diligence process in relation to slavery and human trafficking in our business and supply chain

We have a process to regularly report important human rights issues to the Board of Directors of NEC Europe.

In the Reporting Period, We have participated to a due diligence exercise led by NEC Corporation to confirm respect of human rights and occupational health and safety within our organisation.

Our business

We engage with other NEC Group companies and our partners to establish whether the human resources and labour management, procurement, and other operational processes of subsidiaries and business partners comply with international standards and legal requirements. We support third party checks and the requests of our customers as applicable when they require disclosure of our practices. We take corrective actions to improve our due diligence processes as necessary.

Working conditions and labour	Health and Safety
<ul style="list-style-type: none"> We prevent illegal working both as part of eligibility screening checks for any new employee in NEC Europe and then on a continual basis. These checks are based on the mandatory provision of documentation compliant with applicable law. Our workers are employed in compliance with all applicable laws and regulations. We comply with regulations including working hours and minimum wage. Employees are provided with payslips and the relevant amount, net of statutory deductions, is paid timely to their elected bank account. Our recruitment process is fair and compliant with all applicable international/national standards and legislation. 	<ul style="list-style-type: none"> We conduct health and safety risk assessments including on wellbeing, with provisions covering working hours. Responsibilities for the provision of a safe environment are identified, allowing for the promotion of the health and safety of our employees, subcontractors and other stakeholders including visitors.

Our supply chain

Our approach to responsible sourcing is founded on the NEC Group Responsible Procurement approach¹⁶. For Us, responsible sourcing includes never participate, knowingly or unknowingly in any

¹⁶ <https://www.nec.com/en/global/purchasing/sustainable.html>

form of child, forced or bonded labour and to never encourage or be complicit to unethical procurement including through our sourcing practices.

The NEC Europe team in charge of evaluating the compliance of suppliers to our requirements includes members of procurement, sustainability and finance. Our due diligence process considers the difference in activities and annual spend. Our process for internal decision identifies red flags based on the ILO's list of the most common signs of forced labour.

We expect our partners and suppliers, as a minimum, to comply with all applicable laws, regulations and international standards covering modern slavery and other social, environmental and safety performance elements, to respect human rights and understand the principles of the NEC Group Guidelines for Responsible business Conduct in Supply Chain. Through regular checks, We aim to establish the supplier's level of awareness in identifying, preventing and mitigating the evolving risk of forced labour within its own organisation and supply chain.

Pre-selection due diligence

Our pre-selection due diligence of candidate suppliers includes a desktop review of their practices using a candidate supplier questionnaire that We have developed internally based on the requirements of our business, a check of documented evidence such as the existence of policies, information on their website and code of conduct, of their modern slavery statement published on the UK Government Modern Slavery Statement Registry as applicable, and a benchmark against available country risk factors¹⁷ media information, the international context and other sources¹⁸.

Ongoing due diligence

Every year, We select about 10% of our strategic partners and approved suppliers with whom We have long term long-term relationships and review their continual compliance to our responsible sourcing requirements, legal changes or new trends. We also engage with them to obtain visibility of their supply chains beyond first tier where relevant.

Any inactive supplier is deselected after 2 years and submitted to a full review of their business practices before reactivation.

Onsite audits

Due to changes in business activities, the number of candidate suppliers representing potentially a higher risk in terms of health and safety considerations has significantly decreased in the second half of the Reporting Period and We have conducted a reduced number of onsite audits in comparison with the previous Reporting Period.

In the event that We would identify or suspect a potential higher risk in modern slavery or forced labour in our supply chain, We would consider what measures would be required to mitigate such risk. Such measures may include expanding the scope and type of our on-site audits.

Contractual obligations

Selected partners and suppliers must meet our terms and conditions of purchase throughout the duration of our relationship with them.

We expect them to report serious incidents (and any corrective actions necessary) to Us in a timely manner. When the supplier doesn't meet the requirements, We examine their own practices in further detail. We acknowledge that remediation can take many forms and will depend on the noncompliance or deviance from the principles contained in the "NEC Group Guidelines for Responsible business Conduct in Supply Chain". Where our approved suppliers have responsible business conduct obligations in their contract, our contractual process includes an obligation to remedy any noncompliance in the appropriate timeline.

¹⁷ For example, a country that has not ratified the ILO fundamental conventions or has a weak record of implementation.

¹⁸ For example, the Transparency International Corruption Perception Index and other reports by Non-For-Profit organisations.

Where applicable, We include back to back compliance requirements, whereby suppliers undertake that their sub-suppliers will comply with provisions equals to those set out by NEC Europe.

In extreme cases, We reserve the right to disengage responsibly or to terminate any relationship in place with a supplier, where a supplier refuses to remedy a serious noncompliance or deviance.

Other requirements

We use an electronic compliance tool which informs Us about potential commercial and reputational risks pertaining to certain candidate suppliers. We re-confirm the compliance of selected suppliers and partners to the NEC Guidelines for Responsible Business Conduct.

In addition to our due diligence processes, We engage with peers and participate to conferences and webinars. We monitor regulatory changes, and We also refer to resources including Walk Free Global Slavery Index, other indices and world events to further understand modern slavery risk in our supply chain. We continue to monitor the risks of modern slavery in connection to broader labour trends and other economic, politics and environmental issues that affect humans and the planet.

Further information on the NEC Group due diligence process in relation to slavery and human trafficking in its supply chain is provided in the NEC Group Modern Slavery and Human Trafficking Statement¹⁹.

Parts of our business and supply chain where there is a risk of modern slavery taking place and steps taken to assess and manage that risk

We have not found any ILO indicators of forced labour within our organisation. We have not received claims of modern slavery through Safecall or through our grievance system or any other system. No remediation or compensation for human rights abuse was necessary.

Based on the assessment of the results of our checks on candidate partners and suppliers, We estimate our exposure to forced labour, human right risks and other risks in our supply chain as “low” (99%) to “moderate”. “Moderate” occurred once when an initial lack of documented information available on a supplier process could be ultimately clarified by the candidate supplier.

We didn't have to take any measure of disengagement against suppliers for reasons of forced labour or other human rights breach. We have not been approached by NGOs²⁰ in relation to modern slavery or forced labour concerns.



¹⁹ <https://www.nec.com/en/global/csr/modernslavery/index.html>

²⁰ Non-Governmental Organisations

Our business

The steps taken to assess and manage the different forms of the risk of modern slavery in our organisation have included:

- Support by the senior Management at NEC.
- Checks by HR professionals to ensure labour conditions and laws are observed.
- Communication and dialogue in identifying risks of potential exposure to modern slavery.
- Employee engagement surveys.
- Consultation with our employees on company processes informally and through committees.

Our supply chain

The steps taken to assess and manage that risk in our supply chain have included:

- Submitting all our suppliers to our due diligence process.
- Use of employment agencies only after required standards were validated.
- Trading with professional service providers with an excellent reputation in their field.
- Making our external confidential reporting line, Safecall, available to our suppliers in the context of their relationship with Us.

Effectiveness in ensuring that slavery and human trafficking is not taking place in our business and supply chain

We measure the effectiveness of our initiatives against our progress goals that We consider appropriate for our business and our supply chain. Based on results achieved, We consider that the processes that We have in place to prevent slavery and human trafficking from taking place in our business and supply chain are effective.

Training and capacity building

By training and capacity building, We mean the wide range of initiatives that We have implemented to increase the knowledge and skills of our personnel to improve the prevention of failure of responsible business conduct, including modern slavery and breach of human rights, and NEC Europe's associated standards.

We have provided training to our whole organisation, our front-line personnel,



human resources, executive-level personnel, procurement personnel, our suppliers.

We have also promoted the fair treatment of our people, the encouragement of dialogue and collaboration with our stakeholders are also promoted as part of the NEC Way and Code of Conduct.

Our business

Senior leadership at NEC Europe drives a culture of responsible behaviour through a variety of internal initiatives and the use of internal communication tools.

- We upscale the awareness of all personnel through awareness activities in connection with sustainability and human rights
- We make information about slavery and human trafficking available on our intranet, including this Statement.
- We organise an annual eLearning on sustainable procurement.
- We provide an induction to our workers and subcontractors, explaining our way of working.
- We train our procurement team and extended users on recognising the signs of modern slavery.
- We promote compliance as the fundamental basis of our activities through "compliance day".
- Risks and opportunities are discussed during management systems reviews which involve a balanced representation of personnel and management.
- We encourage feedback to continually improve our management systems and performance.

Our supply chain

We have sought to engage our direct suppliers on our responsible business conduct expectations by sharing information on relevant sustainability processes.

Stakeholder engagement

We don't have trade unions in our organisations, but We engage with labour councils.

We take inputs from our customers, suppliers, employees and experts to better understand societal expectations and evolving requirements with regards to human rights and modern slavery. We support our customers in their request regarding our compliance to modern slavery requirements.

We are attentive to improve our practices by learning from peers to progress on our Sustainable Development Goal Ambition pathway. For example, We are engaged within the UN Global Compact Network UK and have contributed to peer reviews of modern slavery statements.

We have participated to human rights and corporate responsibility events or webinars organised by the UN Global Compact, Tech UK and other organisations such as the Japanese Business Council in Europe.


Looking ahead, our plan in the Financial Year ending 31st March 2025

Through the Financial Year ending 31st March 2025, We will continue to:

- Publish our statements on recognised websites that promote the fight against modern slavery and human trafficking as appropriate.
- Exercise vigilance and strengthen human rights due diligence.
- Continue to bring together forced labour, wider human rights and other corporate sustainability topics such as environmental due diligence using the feedback received to develop further joined actions for improved responsible business conduct and due diligence.
- Participate in several human rights events, remain a Member of the UN GC Network UK and endorse the Ten Principles of the UN GC.
- Promote ongoing improvements and measures for upstream suppliers.
- Facilitate the identification of flags of modern slavery for those who visits suppliers.
- Continue to understand the maturity of the human rights and/or modern slavery disclosures of our strategic customers in relation with the revenue they generate for NEC.

This Statement was approved by the Board of Directors of NEC EUROPE LTD on 30 September 2024.

Signed on the same day

A handwritten signature in black ink, appearing to read 'Chris Jackson', with a stylized flourish at the end.

Chris Jackson
President and CEO