

COMPLIANCE STATEMENT FOR THE MODERN SLAVERY ACT 2015

covering the year 1 April 2018 to 31 March 2019

Approved by the Board of Annodata Limited on 23 September 2019

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 of printer and copier hardware manufactured by its parent company, together with consumables, accessories and software associated with these products. Alongside this is a growing business in the supply of 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 has adopted 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.

In response to the risk of modern slavery and other human rights and environmental concerns, KYOCERA Document Solutions Inc. distributes its Supply-Chain CSR Deployment Guidebook (available here: https://www.kyoceradocumentsolutions.com/social/partners/pdf/2018_Supply-chain_CSR_Deployment_Guidebook_Ver2_en.pdf) to new suppliers. This provides them with guidance about the prohibition of child labour and forced labour. Suppliers inside and outside Japan are also required to complete self-assessment questionnaires and attend training.

3. Due diligence processes

Annodata asks all new suppliers to confirm whether they comply with the UK modern slavery act 2015 as part of the supplier registration process.

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 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.

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. 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. Here 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. During 2017/18, KYOCERA conducted a survey of suppliers, not only in Japan, but also in China and Vietnam where it has plants on their use of conflict minerals. Furthermore, KYOCERA conducted due diligence on suppliers who answered that they purchase conflict minerals from the Democratic Republic of the Congo (DRC) or its neighbouring countries.

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

Annodata currently doesn’t have any key performance indicators specifically on the measures taken against modern slavery. We are reviewing best practice across the industry to identify potentially suitable measures to apply for 2019/20.

6. Training on modern slavery and trafficking

KYOCERA carries out training of the manufacturing supply chain in relation to labour conditions. Given the limited interaction of the majority of Annodata employees with at risk supply partners, we currently do not train them on modern slavery and trafficking issues specifically, but all employees are made aware of the “speak up” channels. During 2019/20, our human resources team will receive training in spotting the signs of slavery in potential employees and contractors.

Signed:

[signature redacted for publication]

Rod Barthet
Managing Director
Annodata Limited
30th September 2019