

An aerial photograph of a long, multi-lane bridge spanning a deep blue body of water. A single red car is visible on the bridge. To the right, a rocky coastline with some green and brown vegetation is visible. The overall scene is captured from a high angle, looking down at the bridge and the water.

HITACHI

Modern Slavery Act

Transparency Statement
Hitachi Europe Limited



Hitachi Europe Limited is deeply committed to identifying, preventing, and addressing modern slavery and its root causes across our business and supply chain. We recognise this responsibility as central to our values and to building a sustainable future.

Andrew Barr
President, Hitachi Europe Limited

Modern Slavery Act 2015 Statement for the year ending 31 March 2025

Hitachi Europe Limited recognises the importance of identifying and preventing modern slavery and its causes in our business and supply chain.

This statement, our tenth 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 2025 as well as our plans for the current year. It covers Hitachi Europe Limited only. For other Hitachi Group company statements please see the relevant company website.

Highlights from the past 12 months



Over the last year, we have:



Commenced deployment of EcoVadis CSR & Sustainability Risk Assessment



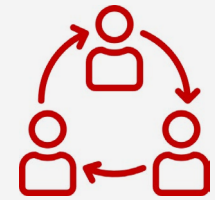
Actioned further salient risk assessment outputs and stakeholder engagement



Strengthened cross-company collaboration in Europe on human rights due diligence



Launched Business and Human Rights training



Collaborated and actively engaged with external organisations, stakeholders, international business associations and bodies on modern slavery issues

The organisation's structure, its business and its supply chains

Our business

Hitachi Europe Limited is part of the Hitachi Group and is a wholly owned subsidiary of Hitachi, Ltd. in Japan.

In the 2024 financial year, Hitachi Europe Limited employed **540** people.

Hitachi Europe's Regional Headquarters are at Datchet in the UK.
Hitachi Europe also has:

Subsidiary companies in

- France
- Germany
- Greece
- Italy
- Spain
- Kingdom of Saudi Arabia

Branch offices in

- Denmark (closed on 1 November 2024)
- Poland
- South Africa
- Switzerland
- Turkey

Representative office in

- Romania

Our German subsidiary has a branch office in

- Belgium

These offices are responsible for sales and/or business development.

Supply chains

Our supply chains comprise approximately 830 trade suppliers and 1,800 non-trade suppliers, located across Europe, Asia, Africa, the Middle East, and North America.

Our values



Harmony

Hitachi's "Harmony (Wa)" goes beyond mere unity and teamwork. This phrase embodies a commitment to embracing and respecting the unique qualities of our diverse employees.

We value the opinions of others and, when faced with differing views, engage in open discussions. Once a consensus is reached, we unite our efforts toward achieving the same goal.



Sincerity

Hitachi's "Sincerity (Makoto)" represents a spirit of always having a sense of ownership, addressing matters with honesty and sincerity.

We see societal issues as our own and learn from failures to enhance our efforts for better outcomes in addressing these challenges.



Pioneering Spirit

Hitachi's "Pioneering Spirit (Kaitakusha-seishin)" represents a mindset of exploring uncharted territory with innovative approaches.

As a pioneer within our areas of expertise, we keep up with a changing world and take on new challenges.

Operations

The EMEA Regional Headquarters in the UK operates as the EMEA corporate centre for Hitachi, Ltd.

We provide support and services to Hitachi's European Group of companies and, along with our other UK-based locations, also includes or encompasses a number of diverse businesses, which are organised in operational business groups supplying a variety of products and services under the Hitachi brand. In the financial year ending 31 March 2025 these included:



- **The Security Business Group**
– focuses on digital security solutions and finger vein technology, a secure, simple and safe way for banks to identify their customers by reading their unique vein pattern;
- **The Particle Beam Therapy Group**
– provides systems to deliver proton therapy, one of the most advanced forms of cancer therapy available, offering treatment with pinpoint accuracy and minimal side effects; and

- **The Hitachi ZeroCarbon Group**
– offers digital solutions, combining Hitachi's extensive operational technology and advanced IT capability to meet client needs in areas including EV fleet and energy.

We also provide corporate, administrative, compliance and governance services to other Hitachi Group companies.

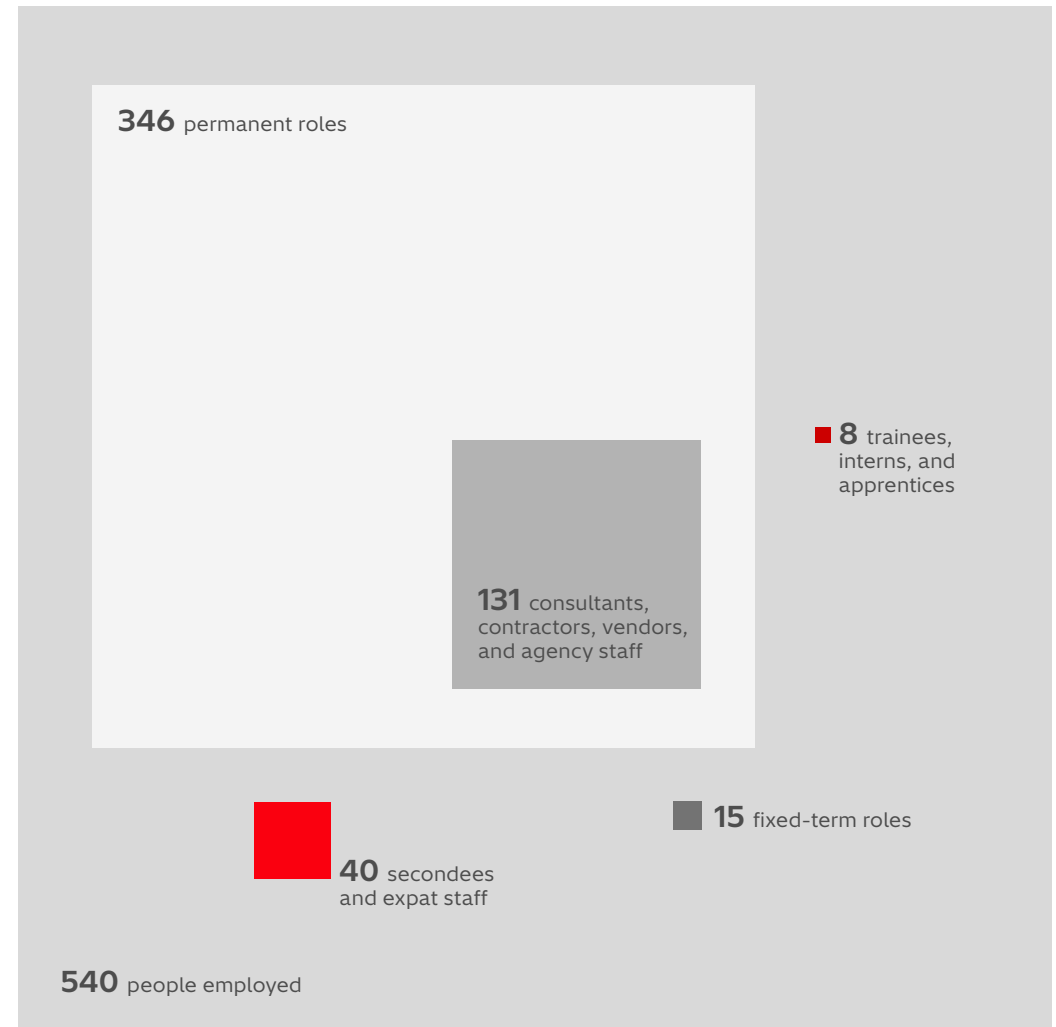
In the 2024 financial year, Hitachi Europe Limited had a turnover of £143.6 million.



Our staff

In the UK, we **employ 540 people**. This includes 346 permanent roles, and 15 fixed-term roles. In addition, we have 131 consultants, contractors, vendors, and agency staff; 8 trainees, interns, and apprentices; and 40 secondees and expat staff.

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 Europe.



Our supply chain

We have approximately **830 trade suppliers** (of which 57 are Hitachi Group companies) that supply either complete products or components of our products. Many of these suppliers are headquartered in:

- Belgium
- Denmark
- France
- Germany
- Greece
- Italy
- Japan
- Netherlands
- Poland
- Spain
- Switzerland
- United Arab Emirates
- United Kingdom
- USA

We have approximately **1,840 further suppliers** (of which 136 are Hitachi Group companies) which are categorised as non-trade. They supply everything used for our operations that is not a product or product component. Most of these suppliers are headquartered in:

- Austria
- Belgium
- China
- Denmark
- Finland
- France
- Germany
- Greece
- Hong Kong
- India
- Italy
- Japan
- Netherlands
- Poland
- Saudi Arabia
- Singapore
- South Africa
- Spain
- Sweden
- Switzerland
- Thailand
- Türkiye
- United Arab Emirates
- United Kingdom
- USA

830 trade suppliers



57 are Hitachi Group companies



136 are Hitachi Group companies

1,840 further suppliers

Policies relevant to slavery and human trafficking

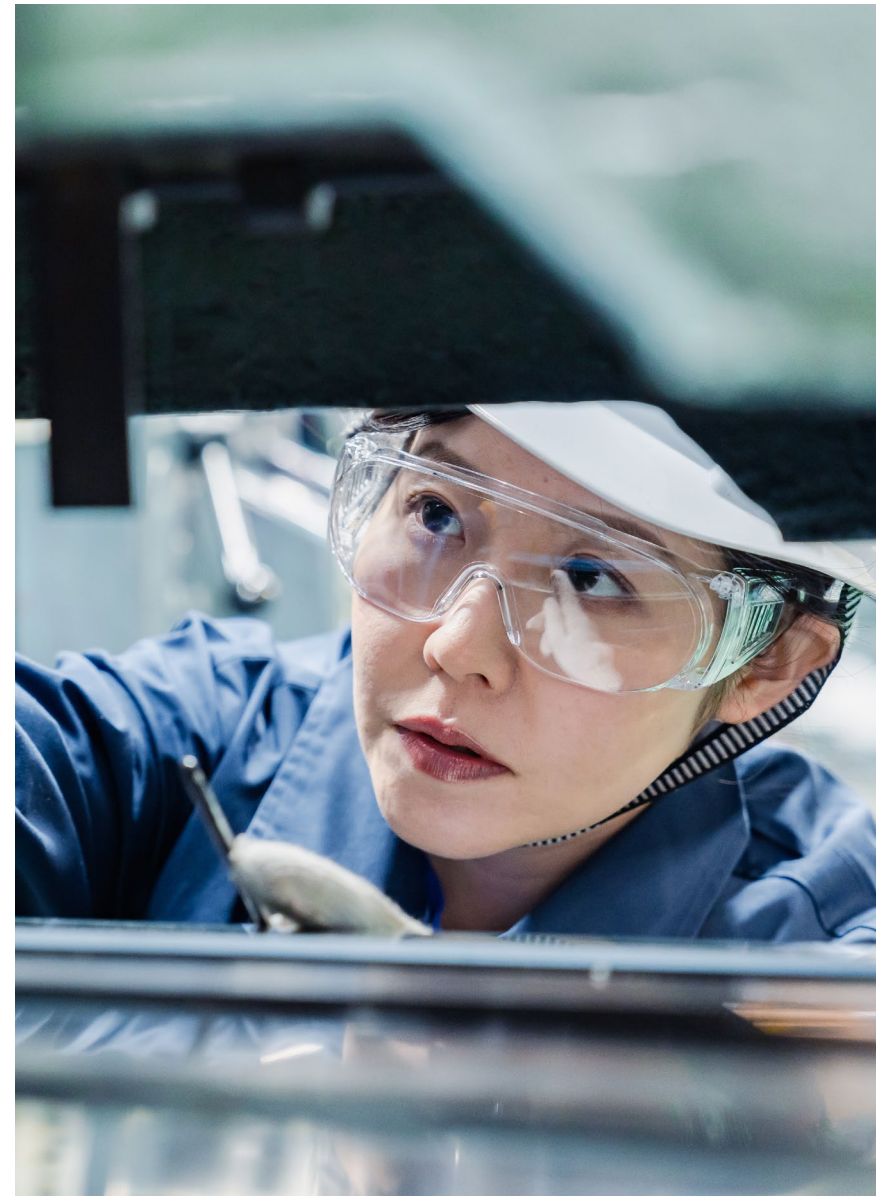
Our approach

At Hitachi Europe Limited, our commitment goes beyond compliance. We believe that respect for human rights is fundamental to how we do business and central to the trust we build with employees, partners, and society. Preventing modern slavery and human trafficking is not only a legal obligation but also a business imperative.

Our statement is reviewed by the Executive Committee and approved by our Board of Directors, reflecting our conviction that human rights must be safeguarded at the highest levels of governance.

In line with Hitachi's global human rights policy, we aspire to create a value chain where every stakeholder is treated with dignity and fairness. We actively seek to partner with suppliers who share these values and collaborate with those who are still developing their capabilities, helping to raise standards across the industries and regions where we operate. We also invest in building awareness among our employees and colleagues across the Hitachi Group, recognising that everyone has a role to play in identifying and addressing risks.

We acknowledge that challenges remain, particularly in influencing suppliers where our leverage is limited and in gaining full visibility into extended supply chains. But we see these not as barriers, rather as opportunities to innovate and to work alongside external experts, peers, and stakeholders to drive collective progress. Our ambition is to ensure that our approach is not only robust and effective but also contributes to a more sustainable and equitable future for all.



Our policies

Hitachi Europe's commitment to preventing modern slavery and human trafficking is reinforced by a comprehensive set of policies designed to address these risks. These policies are regularly reviewed and strengthened to reflect both changes in our business and the evolving external environment, ensuring our approach remains effective, relevant, and aligned with best practice.

- 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. We understand human rights to be, at a minimum, those outlined in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.



- 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.
- The **Hitachi Group written whistleblowing procedure** encourages employees 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 non-compliance is identified.
- The **Hitachi Group Sustainable Procurement Guidelines** are a communication tool informing suppliers about Hitachi Group initiatives. They highlight that Hitachi Europe Limited suppliers must uphold the human rights of workers and treat them with dignity and respect as understood by the international community. This applies to all types of workers, including temporary staff, migrant workers, students, and direct employees. The Guidelines also detail the Hitachi Europe Limited's policies and initiatives relating to sustainability and specifies key points that must be complied with.
- **Hitachi Europe Limited's written employment practices and procedures** ensure fair recruitment and treatment of employees.

Hitachi Europe Limited supplements the above with the following relevant internal policies, procedures, principles, manuals and guidelines that are subject to continuous review and improvement:

- **Hitachi Europe Business Partner Due Diligence Procedure**
- **Hitachi Europe Health & Safety Policy**
- **Hitachi Europe Waste Management Policy**
- **Hitachi Europe Contract Works Policy**
- **Hitachi Europe Value Integration Group Standard and Operational Manual**
- **Hitachi Group Compliance Programme Framework Policy**
- **Hitachi Group's Responsible Supply Chain of Minerals Policy**
- **Hitachi Global Diversity, Equity, and Inclusion (DEI) Policy**
- **Hitachi Group Approach to Quality Assurance and Product Safety**
- **Hitachi Group Social Media Communication Guidelines**
- **Hitachi Group Policy on Social Contribution Activities**
- **Hitachi Group Principles Guiding the Ethical Use of AI**
- Other **written employment practices and procedures** that ensure fair recruitment and treatment of employees.

Hitachi Europe Limited ensures its policies are readily available to all workers and internal parties via its internal document management system and we regularly review and update our policies accordingly.

Due diligence

Processes in relation to slavery and human trafficking in its business and supply chains.

Hitachi Europe Limited identifies, assesses, controls, and monitors the risk of modern slavery and human trafficking through our supplier due diligence.

Our due diligence measures include:

- **Supplier screening:** All suppliers undergo desktop checks for sanctions, adverse media, Know Your Customer (KYC), and ethical risks.
- **Sustainable Procurement Guidelines:** Shared with all suppliers, requiring freely chosen employment, fair wages, and humane treatment.
- **Contractual clauses:** All suppliers must comply with applicable laws and Hitachi policies.
- **Audit rights:** Reserved in many supplier contracts to check compliance. This includes modern slavery.
- **Whistleblowing channels:** Including the Global Compliance Hotline, accessible to employees, suppliers, and third parties.

Due diligence



HRDD process



Risk assessment

Parts of the business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps taken to assess and manage that risk.

Hitachi Europe Limited has undertaken the following assessments that include the risk of modern slavery and human trafficking. Core activities include:

Human Rights Legislative Landscape Assessment:

Mapping and gap analysis of developments on current and upcoming human rights obligations at the national and international level against the UN Guiding Principles framework. Wave 1 focuses on identified value chain countries and the known legislation gap for international human rights treaties and labour standards. This is updated and monitored on a periodic basis.

Analysis of the Workforce Composition:

An initial desktop assessment and mapping of Hitachi Europe's value chain focusing specifically on workforce composition and the intersectionality of vulnerable groups.

Salient Risk Assessment Value Chain Mapping:

Mapping of Hitachi Europe's value chain; an initial desktop assessment profiling the link on business relationship type and interests, operating context regarding political change, ethnic tension, conflict, corruption, legislation enforcement and rule of law, the type of business activity and presence and intersection of vulnerable groups to measure and to identify areas where there is potential or indirect risk for modern slavery using published data from sources such as:

- Armed Conflict Location & Event Data Project (ACLED) Conflict Severity Index
- Geneva Academy's Rule of Law in Armed Conflict Portal
- World Justice Project (WJP) Rule of Law (RoL) Index
- Ratification of International Human Rights Treaties per country
- Ratification of International Labour Standards per country
- United Nations Children's Fund (UNICEF) and Global Child Forum's Children's Rights and Business Atlas
- International Trade Union (ITUC) Global Labour Rights
- U.S. Department of State Trafficking in Persons Report
- Transparency International's Corruption Perception Index
- U.S. Department of Labour List of Goods Produced by Child Labour or Forced Labour
- United Nations Development Programme Gender Inequality Index
- Walk Free Global Slavery Index

The below table provides a snapshot of risk profiles for first tier sourcing countries, using modern slavery analysis from [Walk Free's 2023 Global Slavery Index*](#).

Estimated prevalence of modern slavery per 1,000 population

Most prevalent

The countries estimated to have the highest prevalence of modern slavery tend to be conflict-affected, have state-imposed forced labour, and have weak governance.

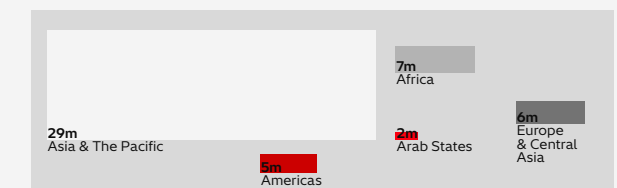
	Rank	Prevalence Rate*	# of People
North Korea	1	104.6	2,696,000
Eritrea	2	90.3	320,000
Mauritania	3	32.0	149,000
Saudi Arabia	4	21.3	740,000
Türkiye	5	15.6	1,320,000
Tajikistan	6	14.0	133,000
United Arab Emirates	7	13.4	132,000
Russia	8	13.0	1,899,000
Afghanistan	9	13.0	505,000
Kuwait	10	13.0	55,000

Least prevalent

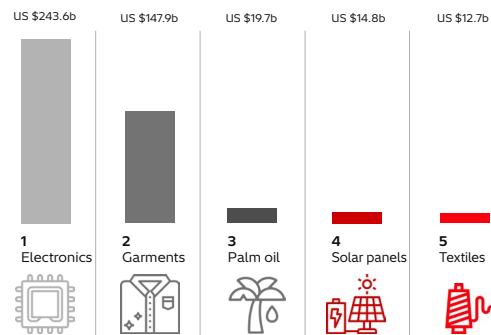
The countries with the lowest prevalence of modern slavery are those with strong governance and strong government responses to modern slavery.

	Rank	Prevalence Rate*	# of People
Switzerland	160	0.5	4,000
Norway	159	0.5	3,000
Germany	158	0.6	47,000
Netherlands	157	0.6	10,000
Sweden	156	0.6	6,000
Denmark	155	0.6	4,000
Belgium	154	1.0	11,000
Ireland	153	1.1	5,000
Japan	152	1.1	144,000
Finland	151	1.4	8,000

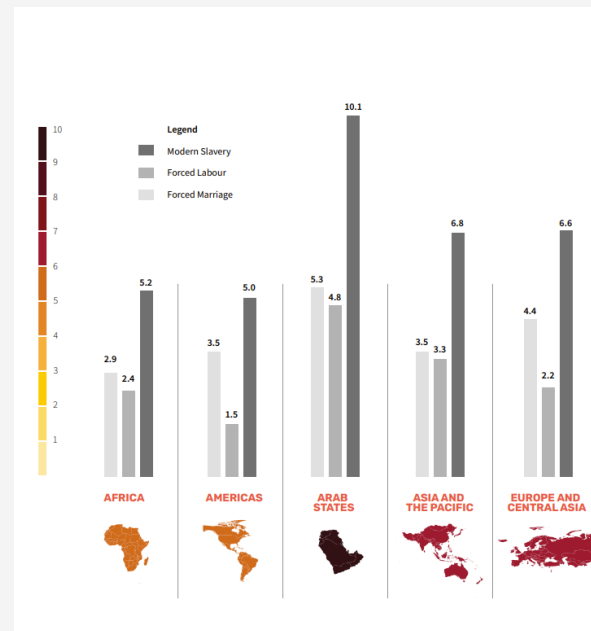
49.6m people are living in modern slavery globally



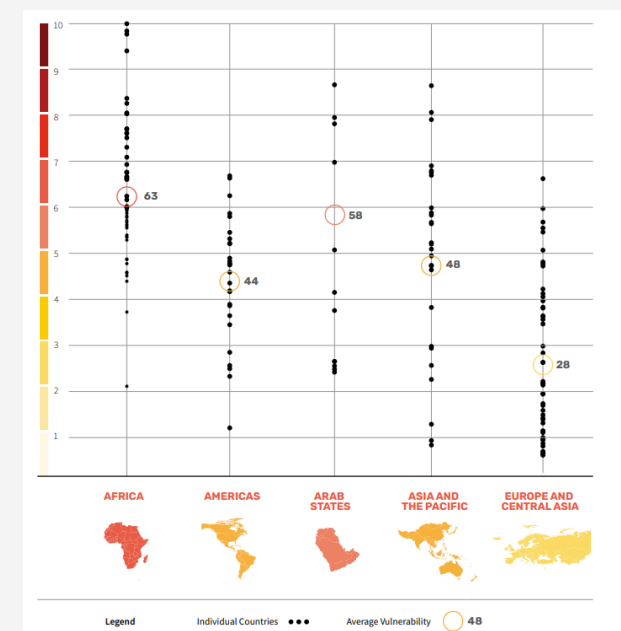
Of the products at-risk of being produced with modern slavery, G20 countries spent the most on:



Prevalence of modern slavery (per 1,000 people), by region and type



Level of vulnerability to modern slavery with regional averages



Effectiveness

In ensuring that slavery and human trafficking is not taking place in its business or supply chains, measures against such performance indicators as it considers appropriate Hitachi Europe remains absolutely committed to supporting the efforts to identify and eradicate modern slavery and human trafficking.

Over the last year:

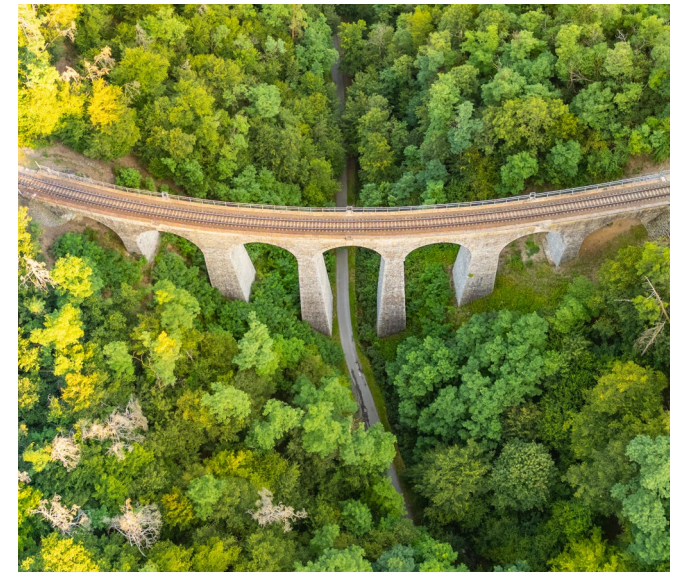
Hitachi Group has:

- Continued its **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.
- In addition, 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**.

Hitachi Europe has:

- Appointed a Head of Human Rights Due Diligence Development**, who is responsible for assessing the current situation regarding **HRDD** and planning appropriate actions. The assessment also involves working with other Hitachi companies operating and/or headquartered within Europe, Middle East, and Africa to promote **HRDD** and advise on best practices, share learning, and to build an ongoing **HRDD** community.
- Completed Human Rights Due Diligence governance gap analysis** on status aligned to the UN Guiding Principles framework. We have devised a plan, produced recommendations, deliverables, and roadmap to align and adapt our policies and procedures to embed Human Rights Due Diligence.
- Established a core team and cross-functional working group** to provide strategic direction and leadership to ensure we have the appropriate mechanisms in place to identify, respond to, mitigate, and prevent adverse human rights impacts in our own value chain.
- Kicked off a salient risk assessment** of our value chain with the aim of identifying our salient human rights issues, which will form the basis for our ongoing risk analysis and our due diligence activities.
- Raised awareness, built expertise**, and developed and promoted Human Rights Due Diligence through the delivery of several training and awareness sessions on human rights and human rights due diligence.

- Annual mandatory Hitachi Group Code of Ethics and Business Conduct training** via our Global Ethics and Compliance programme; this includes a **new course on business and human rights**.
- Provided an **information exchange on Human Rights Due Diligence** amongst Hitachi companies headquartered and operating in EMEA to discuss challenges and good practices.
- Collaborated and actively engaged** with external organisations, stakeholders, international business associations and bodies on the issues of modern slavery.



Training

Employees

Hitachi Europe Limited ensures that **all new employees undertake mandatory online Global Ethics and Compliance training**, this includes 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.

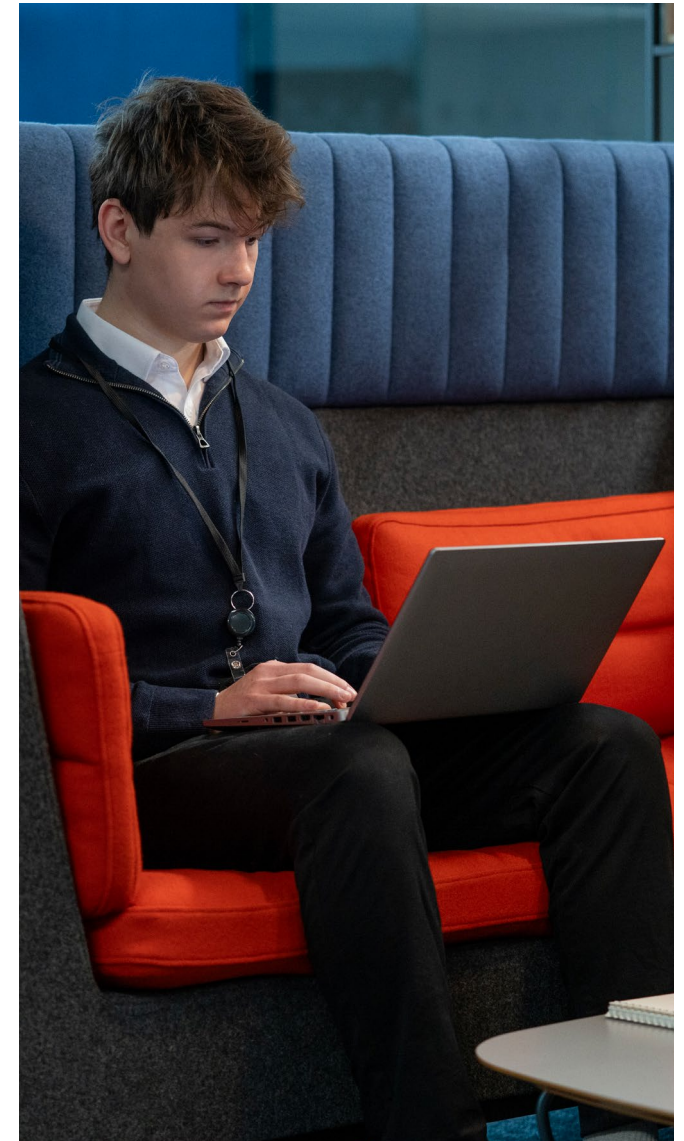
Suppliers

Hitachi Europe Limited encourages its suppliers to **establish training programmes** for managers and workers to implement its policies, procedures, and improvement objectives and to meet the applicable legal and regulatory requirements, this includes the provision of modern slavery training.

Training plans

Additional work will include modern slavery and trafficking training within a sustainability, ethical business, and human rights context.

During 2025, Hitachi Europe Limited will continue its internal awareness campaign on human rights due diligence which will incorporate modern slavery. This will include briefings, face-to-face meetings with key individuals, departmental team training and advanced bespoke training for targeted departments specifically related to the modern slavery risks they are likely to encounter.



Our future plans

The Human Rights Working Group will continue to provide strategic direction, leadership and to ensure Hitachi Europe Limited has the appropriate mechanisms in place to identify, respond to, mitigate, and prevent our adverse human rights impacts in our own value chain.

Over the next reporting year and beyond, the plan is 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.
- Strengthen tier 1 supplier and supply chain data, analysis and mapping including category classification by operational and sourcing country.

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.
- Review and strengthen our sustainable procurement Human Rights Due Diligence procedures incorporating data, system, and our processes.

- 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.

Due diligence

- Build on the work undertaken by the Human Rights Working Group as part of the wider HEU Human Rights Due Diligence Programme.
- Review, strengthen and develop strategy to reinforce Hitachi Europe's due diligence process (incorporating data, system, and our processes).
- Map and review existing supply chain governance processes related to modern slavery risk including cascading, non-conformances, stakeholder collaboration, risk assessment and grievance mechanisms.

Risk assessment

- Build on the salient risk assessment undertaken by the Hitachi Europe Human Rights Due Diligence Programme. Deepen our engagement with stakeholders and rightsholders and build capacity to understand how salient human rights issues and challenges can be assessed, identified, and prioritised proactively.
- Commence a supply chain mapping exercise and analysis with focus on supply chain and business relationships to aid identifying areas of high risk.
- Continue assessment and mapping of Hitachi Europe's value chain focusing specifically on workforce composition and the intersectionality of vulnerable groups.
- Continue deployment of the EcoVadis CSR & Sustainability Risk Assessment.
- Build on the work to develop an internal modern slavery scoring matrix and risk score; map against

value chain data and incorporate into the wider HRDD Programme.

Effectiveness

- Establish KPIs to develop, lead, monitor and be accountable for the implementation of various HRDD deliverables within Hitachi Europe whilst continuing to focus on ensuring we have the right processes in place to track effectiveness.

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.
- Deploy two new online mandatory courses and track the rollout. Continue activities to develop targeted bespoke training specifically related to the Human Rights Due Diligence and modern slavery risks.
- Continue to invite all Hitachi Group companies in Europe to join in collective learning on human rights with an aim to support Hitachi Group companies in strengthening their knowledge, guidance, and tools on how to embed Human Rights Due Diligence within their value chain.
- Provide an information exchange platform for Hitachi Europe Limited employees and amongst Hitachi companies in Europe to discuss challenges and good practice.
- Continue to collaborate and actively engage with external organisations, stakeholders, the UN Working Group, the Global Child Forum and other international business associations and bodies on the issues of modern slavery, peer learning and openly discussing challenges and solutions.



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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Hitachi Europe Limited's slavery and human trafficking statement for the financial year ended 31 March 2025. It has been ratified by Hitachi Europe Limited's Board of Directors.



Andrew Barr
President
Date: 30/09/2025