

An aerial, high-angle photograph of a shipping yard. The yard is filled with hundreds of intermodal containers stacked in neat rows. The containers come in a variety of colors, including blue, red, green, yellow, and white. Two large yellow gantry cranes are positioned over the stacks of containers, their long jibs extending over the yard. The perspective is from directly above, looking down at the containers.

HITACHI

Modern Slavery Act

Transparency Statement
Hitachi Europe Limited



At Hitachi Europe Limited, our respect for human rights is fundamental to how we conduct business. While the risks associated with modern slavery continue to evolve, our commitment remains unwavering. We will continue to strengthen our processes, work closely with our suppliers and partners, and foster a culture where ethical business practices and human dignity are upheld throughout our operations and value chain.

Michele Fracchiolla
President & CEO, Hitachi Europe Limited



Modern Slavery Act 2015 Statement for the year ending 31 March 2026

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

This statement, our eleventh 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 2026 as well as our plans for the current year. This statement only covers Hitachi Europe Limited (HEU) – for other Hitachi Group company statements please see the relevant company website.



Highlights from the past 12 months

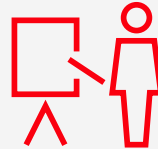
Over the last year, we have:



Started to deploy EcoVadis CSR & Sustainability Risk Assessments across our suppliers



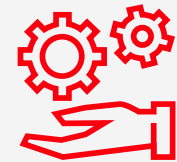
Continued to strengthen cross-company collaboration within our European operations on human rights due diligence



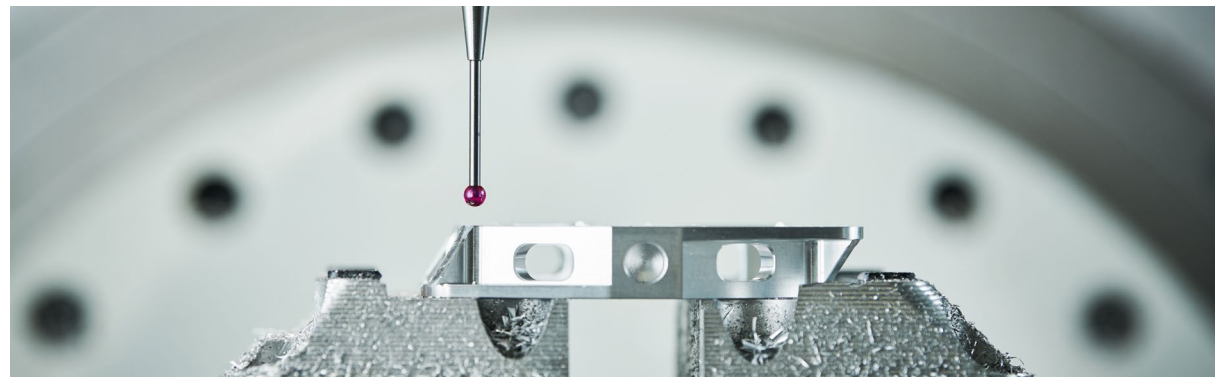
Continued to roll-out Business and Human Rights training



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



Introduced a new HR governance process requiring Finance approval for new roles and notification to the President & CEO, strengthening oversight of workforce planning and recruitment decisions



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.

Hitachi Europe Limited is the regional headquarters of Hitachi in the EMEA region and plays a critical role in supporting the growth of Hitachi overall, acting as a strong regional platform that brings together the breadth of Hitachi's businesses, capabilities, and expertise. By connecting businesses across the Group, creating opportunities for collaboration, and supporting customers across markets, Hitachi Europe Limited strengthens our collective offering and maximises the value of Hitachi.

In the 2025 financial year, Hitachi Europe Limited employed **168** people.

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.

The EMEA Regional Headquarters are at Datchet in the UK.

We also have:

Subsidiary companies in

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

Branch offices in

- 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

During the 2025 financial year, our supply chains comprised approximately **48 trade suppliers** and **838 non-trade**, located across Europe, Asia, Africa, the Middle East, and North America.

Trade suppliers are suppliers providing products or goods to support other Hitachi business units, particularly business units in Japan, with those business units owning the supplier relationship and the European procurement team providing local support.

Non-trade suppliers, by contrast, relate more directly to our own expenditure and are primarily service based, such as consulting and R&D providers. Given the nature of our supply chain, which involves limited direct procurement of raw materials or manufacturing inputs, our supplier due diligence activities therefore primarily relate to our non-trade supplier population.

Governance and oversight

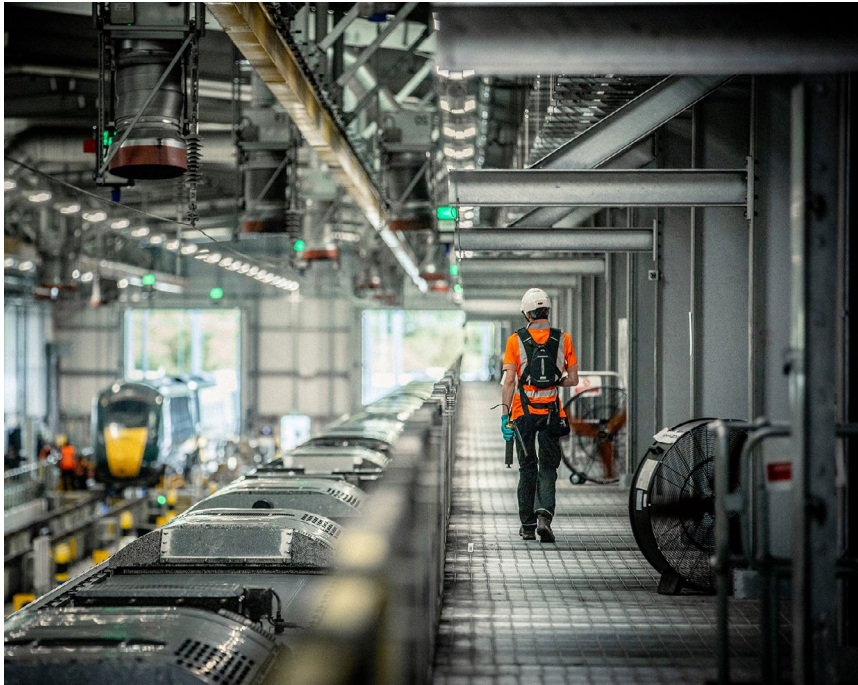
We operate within Hitachi's wider human rights and compliance governance framework. Group-level human rights forums support the implementation of Human Rights Due Diligence (HRDD) and report to executive leadership, including through the rollout of human rights initiatives and training. The Hitachi Group Human Rights Policy provides the overarching framework for this activity, requiring the identification and assessment of actual and potential human rights impacts, actions to prevent or mitigate identified risks, monitoring of effectiveness and remediation where appropriate.

Human rights concerns may be escalated through management, HR, Legal, Ethics & Compliance and the Global Compliance Hotline, with the Global Compliance Office overseeing the concerns-management process. Human rights harm is expressly recognised as potential material misconduct and may therefore be subject to formal investigation and escalation through Compliance. Compliance also reports case volumes, categories, and closure times, including a 90-day closure metric, to the Audit Committee, providing senior-level oversight of how concerns are managed and resolved. Significant human rights risks may also be escalated to senior executives for consideration and decision-making.

Operations

Hitachi Europe Limited operates as the EMEA corporate centre, with the EMEA Regional Headquarters in the UK.

We, along with our other UK-based locations, provide support and services to Hitachi's European Group of companies. This includes 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 2026, 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.

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

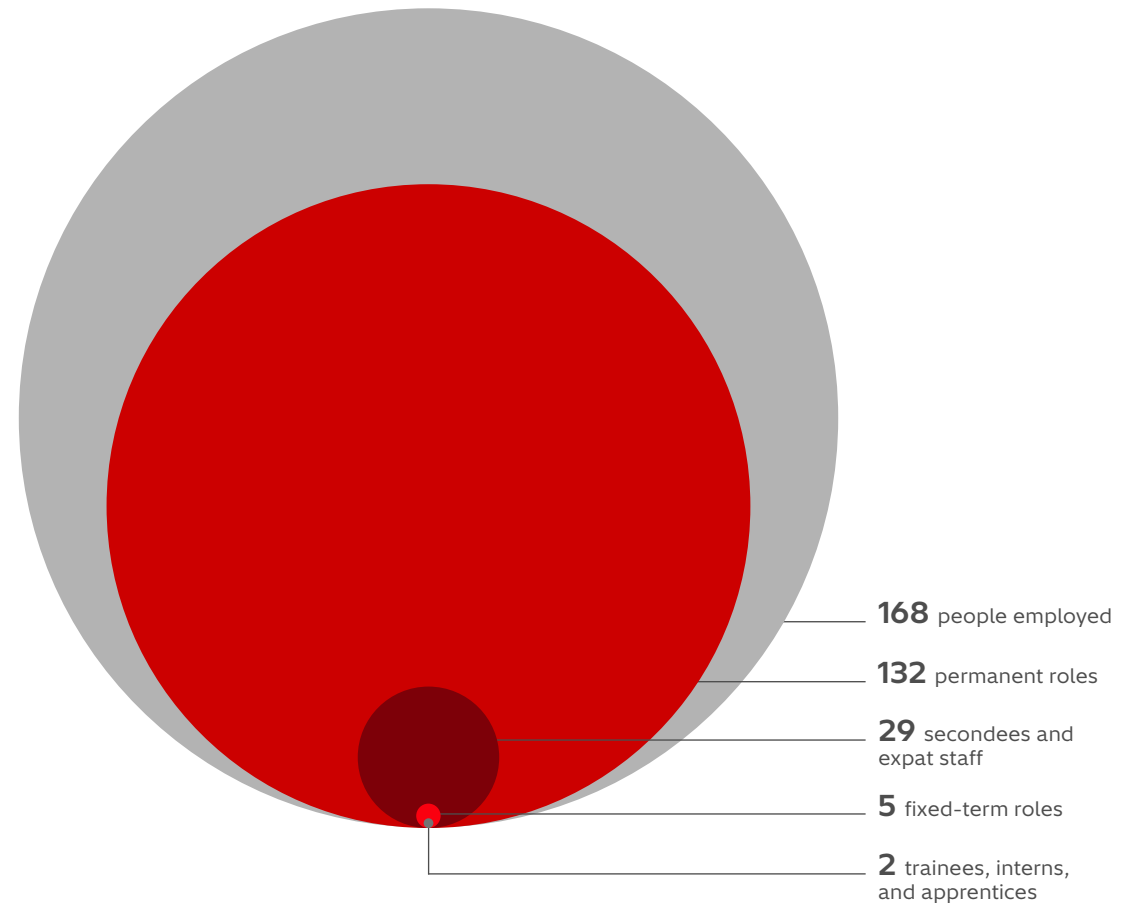
In the 2025 financial year, Hitachi Europe Limited had a turnover of £124.1 million.



Our staff

We **employ 168 people**. This includes 132 permanent roles, and 5 fixed-term roles. In addition, we have 2 trainees, interns, and apprentices, and 29 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.



48 trade suppliers

14 are Hitachi Group companies

838 further suppliers

58 are Hitachi Group companies

Our supply chain

We have approximately **48 trade suppliers** (of which 14 are Hitachi Group companies) that supply either complete products or components of our products. Many of these suppliers are headquartered in:

- Europe
- Asia-Pacific
- The Middle East
- North America

We have approximately **838 further suppliers** (of which 58 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:

- Europe
- Asia-Pacific
- The Middle East
- Africa
- North America

As part of our **2024 Human Rights Saliency Risk Assessment**, we assessed potential human rights risks by reference to their likelihood and severity. The assessment identified a range of salient risks, with the most significant issues including **forced labour, modern slavery, human trafficking, migrant worker risks, child labour, health and safety concerns and wider labour rights risks**.

The assessment also highlighted that the nature and severity of these risks vary by geography, with higher-risk issues identified across a number of jurisdictions. These findings help us to understand where our most significant potential human rights risks may arise and provide a basis for prioritising areas for further due diligence and monitoring.

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 Leadership Team 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 seek to work with suppliers that operate in accordance with our values and expectations

on responsible business conduct. These expectations are supported through our supplier due diligence processes, including questionnaires, risk assessments, and audits, with identified issues informing further supplier engagement, corrective actions and, where appropriate, additional due diligence. We also support suppliers through engagement and training to help strengthen their capabilities and address identified areas for improvement. We also invest in building awareness across Hitachi, including through human rights training for business leaders and annual compliance training that reinforces employees' responsibility to identify and report concerns.

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

- **Hitachi Europe Limited's written employment practices and procedures** ensure fair recruitment and treatment of employees.
- **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, Opportunity and Inclusion (DOI) 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**
- **Hitachi Europe Generative AI Acceptable Use Policy**
- 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 our internal portals, and we regularly review and update our policies accordingly.

Due diligence

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

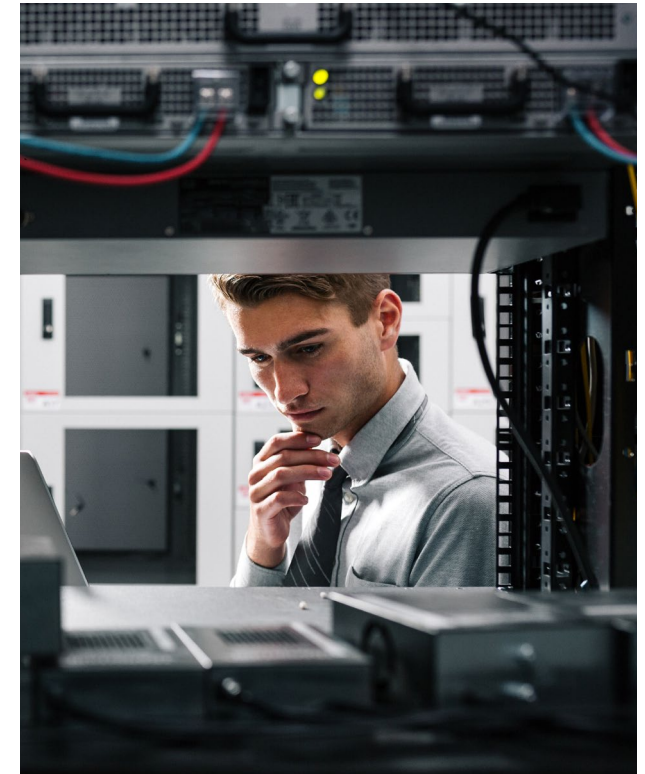
Hitachi Europe Limited identifies, assesses, controls, and monitors the risk of modern slavery and human trafficking through our supplier due diligence as prescribed by the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, as well as the UN Guiding Principles.

Our due diligence measures include:

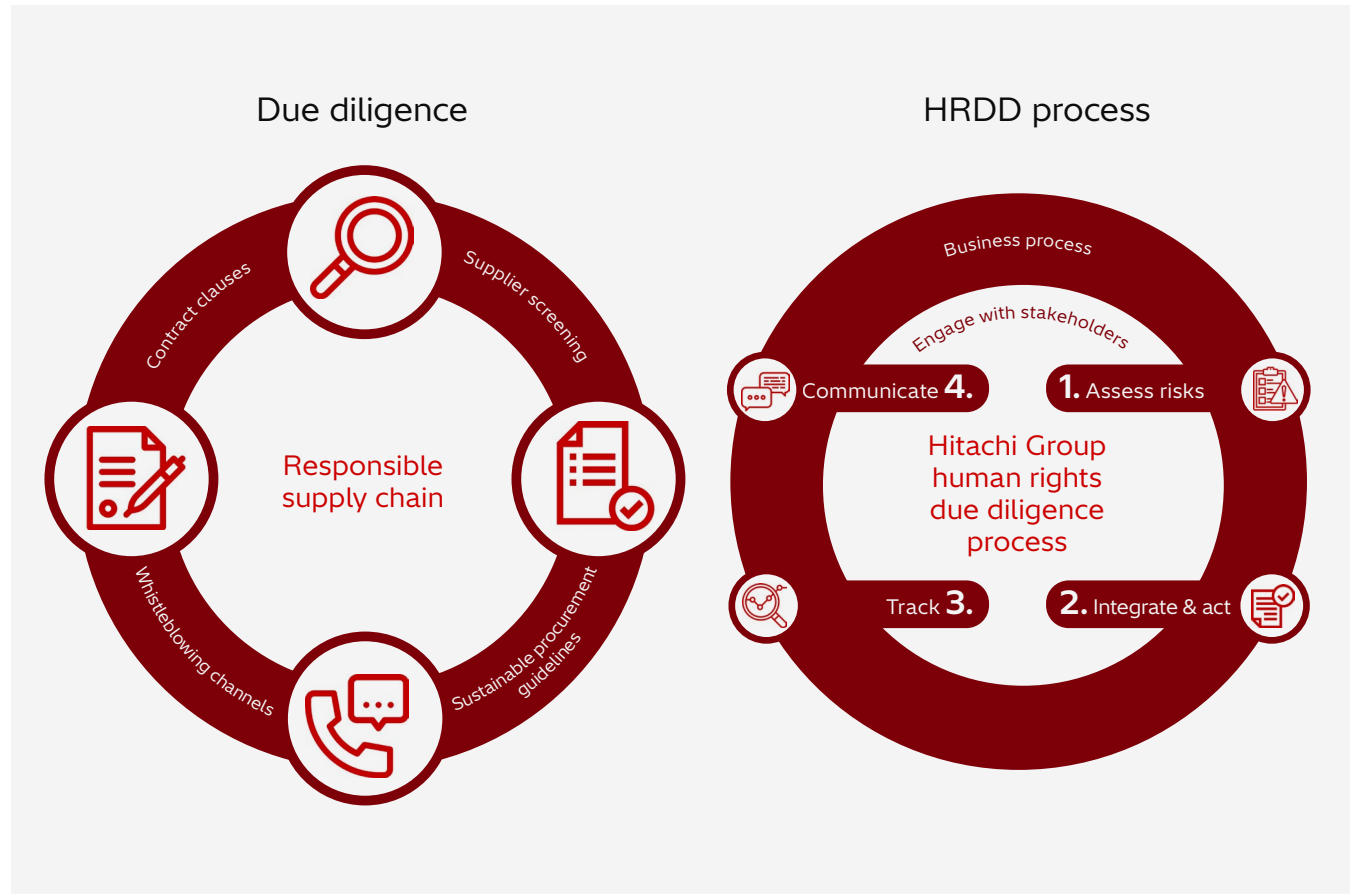
- **Sustainable Procurement Guidelines and contractual clauses:** Shared with all suppliers, requiring freely chosen employment, fair wages, and humane treatment and requiring that all suppliers must comply with applicable laws and Hitachi policies.
- **Supplier due diligence and audit rights:** All suppliers undergo supplier screening in the form of desktop checks for sanctions, adverse media, Know Your Customer (KYC), and ethical risks.

Where supplier screening or assessment results indicate a heightened risk, the supplier may be subject to enhanced due diligence, including an audit. The regional headquarters supports the audit process by coordinating with external audit providers to ensure that relevant assessments are carried out. These audits form part of a broader sustainability audit programme, with human rights due diligence, including working conditions, forming an important component of the audit scope.

Where a supplier repeatedly declines to participate in EcoVadis, including in circumstances where participation may present challenges for smaller and medium-sized enterprises, we seek to ensure that our due diligence does not end at that point. In such cases, we may use a digital backup ESG questionnaire to assess relevant risks within the supplier's operations. Responses are evaluated through a scoring process, and, depending on the outcome, we may work with the supplier to agree appropriate corrective actions and/or undertake further assurance measures, including audits. This alternative process helps us maintain oversight of supplier-related ESG and modern slavery risks where EcoVadis has not been completed.



- **Whistleblowing channels:** The Hitachi Global Compliance Hotline is a 24/7 speak-up channel for employees, contractors and business partners to raise suspected breaches of the Hitachi Group Code of Ethics and Business Conduct, company policies, or laws and regulations, with confidentiality and anonymity available where permitted by law and protection against retaliation. Concerns can be reported online, by phone, or directly to a manager or HR, Compliance or Legal, while existing reports can be followed up using a Report Key and password, and users can also submit questions through the system. The hotline is administered through NAVEX EthicsPoint.
- **Employee grievance process:** Our grievance process enables employees to raise concerns relating to their working conditions, workplace practices and fair treatment, with matters investigated and escalated where appropriate. Where a concern involves suspected wrongdoing or potential human rights harm, employees can also use Hitachi's wider whistleblowing and speak-up channels, providing an additional route through which potential labour and modern slavery-related risks may be identified and escalated.



Risk assessment

Hitachi Europe Limited undertakes the following risk assessment that covers the risk of modern slavery and human trafficking.

Our risk assessment begins with a salient risk assessment and value chain mapping exercise.

This first stage draws on internal and third-party data, including EcoVadis and IQ Plus, to support an initial assessment and profiling of potential modern slavery and broader human rights risks across the value chain. In undertaking this assessment, Hitachi Europe Limited considers the nature of its business relationships and interests, supplier spend, and a range of operating context factors, including political instability, ethnic tension, conflict, corruption, legislative enforcement, and the rule of law. It also takes into account the type of business activity being undertaken, as well as the presence of, and intersecting risks affecting, vulnerable groups.

An EcoVadis IQ Plus assessment was conducted for a total of 884 suppliers, among which 689 suppliers were mapped by the EcoVadis platform for risk assessment. EcoVadis IQ Plus assesses modern slavery and human rights risks by combining automated, data-driven supply chain mapping with publicly available document analysis and continuous external monitoring. As a result of this initial risk assessment, 32 suppliers were identified with high potential risks as compared to modern slavery requirements, which represents less than 5% of our supplier number. The majority of these suppliers are manufacturing companies of industrial equipment. Nevertheless, it should be noted that IQ Plus assessment is a passive assessment, solely based on companies' basic information and available information in the public domain.

As potential next steps, additional actions could be taken to conduct supplier engagement to improve accuracy and better understanding of supplier's risks, and if necessary, implement corrective actions by following Hitachi Group's programme – such as namely supplier risk assessment on EcoVadis and/or sustainability audit.

This initial profiling is supplemented by desktop research using publicly available data sources and recognised human rights, labour rights, and modern slavery indices to help identify where there may be actual, potential, direct, or indirect risks within the value chain.

These sources include, for example:

- Walk Free Global Slavery Index
- U.S. Department of State Trafficking in Persons Report
- U.S. Department of Labour List of Goods Produced by Child Labour or Forced Labour
- International Trade Union Confederation (ITUC) Global Rights Index
- Transparency International's Corruption Perceptions Index

Where relevant, we also draw on wider governance, conflict, and child rights indicators, such as:

- World Justice Project Rule of Law Index
- Armed Conflict Location & Event Data Project (ACLED) Conflict Severity Index
- UNICEF and Global Child Forum's Children's Rights and Business Atlas

Effectiveness

In seeking to ensure that slavery and human trafficking do not take place within our business or supply chains, we remain firmly committed to supporting efforts to identify and eradicate modern slavery and human trafficking, and to monitoring performance against appropriate indicators.

Over the past year we have:

- **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.
- **Maintained 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.

- **Continued to raise awareness, built expertise,** and develop and promote Human Rights Due Diligence through the delivery of several training and awareness sessions.
- **Conducted 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 Europe 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.
- **Established reporting to the Audit Committee** on cases received through our grievance mechanism, including case volumes, categories of cases and their status.



Training

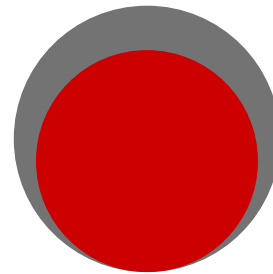
Employees

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, is refreshed annually** and requires 100% completion. 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. In addition, Hitachi provides publicly available training to support its Sustainable Procurement Code of Conduct, covering key expectations including working conditions, working hours, freedom of association and child labour.

Our cross-departmental Human Rights **Working Group takes part in regular development and training** on human rights and human rights due diligence. In addition, they are all required to undertake business and human rights training and will assist in the deployment of human rights training regarding issues of legal compliance, modern slavery and human trafficking.

Furthermore, during the financial year, human rights-related training was delivered to relevant internal stakeholders across EMEA. The training sessions, which were supported by external organisations such as the Equality and Human Rights Commission, were attended by employees from across multiple functions.

Below we have summarised the training completion rates:



Hitachi Group Code of Ethics and Business Conduct Training

168 enrolments

140 completed

83% completion rate



Modern Slavery Training

19 enrolments

19 completed

100% completion rate

During the 2025 financial year, we continued our **internal awareness campaign** on human rights due diligence which incorporated modern slavery. This included 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 may encounter.

Suppliers

We communicate our expectations regarding human rights, labour standards and modern slavery to suppliers through our Sustainable Procurement Guidelines and related supplier engagement activities. Suppliers are encouraged to implement appropriate training programmes for managers and workers to support compliance with these expectations and applicable legal requirements.



Our future plans

We are committed to continuously enhancing our modern slavery programme to effectively identify, assess, and mitigate modern slavery risks throughout our operations. We have outlined below our future commitments which form the basis of our approach and efforts to drive continuous improvement. We will transparently report our progress against these in our statement next year.

Over the next year and beyond we will focus on the following areas:

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

- 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

- 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.

Due diligence

- We will screen our supplier base through EcoVadis IQ Plus, using the supplier data available to Procurement, to identify potential supplier risks and determine where further due diligence or follow-up action may be required.
- As part of our wider Human Rights Due Diligence programme, we will continue to strengthen visibility of our supply chain through enhanced mapping and analysis of our non-trade supplier base. Given the significance of non-trade procurement within our operations, this work will support more targeted risk assessment and due diligence activities across our supplier network.

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 deployment of the EcoVadis CSR & Sustainability Risk Assessment.
- Develop an internal modern slavery scoring matrix and risk score; map against value chain data and incorporate into the wider HRDD Programme.
- Expand supplier self-assessment questionnaire coverage to strengthen human rights risk assessment and track progress by both supplier coverage and the proportion of total procurement spend assessed.
- Develop and communicate a human rights escalation process; designate appropriate specialist

ownership for concerns and define escalation routes to Legal where necessary.

- Strengthen supplier engagement to improve the accuracy of supplier information and deepen understanding of supplier-specific risks.
- Where appropriate, implement corrective actions in line with Hitachi Group programmes, including supplier risk assessments through EcoVadis and/or sustainability audits.

Effectiveness

- Establish KPIs to monitor the implementation of various HRDD deliverables within Hitachi Europe Limited whilst continuing to focus on ensuring we have the right processes in place to track effectiveness.

Training

- Maintain our people's awareness of modern slavery risks through the continued rollout and performance of training across functions.
- 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.

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 2026. It has been approved by Hitachi Europe Limited's Board of Directors.



Michele Fracchiolla
President and CEO
Date: 29/09/2026