

## UK Modern Slavery Act Statement

This statement was made by NTN Europe S.A. for fiscal year ending 31 March 2024, pursuant to section 54 of the Modern Slavery Act 2015 and was approved by the Board of Directors in July 2024.

This statement is updated every financial year and have been made by NTN Europe and its two subsidiaries, NTN Wälzlager GmbH and NTN Bearings (UK) Ltd.

The aim of this declaration is to set out the measures put in place within the company and its two subsidiaries to ensure that modern slavery is not part of our business or supply chain conduct.

NTN Europe is one of the world's leading designers, developers and manufacturers of bearings, linear modules, constant velocity joints, encoders, timing rollers, vehicle spare parts, maintenance products and services. Our products are largely manufactured in our industrial sites.

NTN Europe offers global solutions (Product Life Cycle Management), our customized offer (from design to storage) integrates maintenance, training of the teams and all the services that optimize product performance within its application.

NTN Europe have its head office at Annecy (France).

### 1. CSR

[Corporate Social Responsibility](#) is a foundation of NTN Europe's governance.

To guarantee the longevity of our Company and the sustainability of our activities, we must meet the expectations of our shareholder, but also those of all of our stakeholders, namely our employees, our customers, our suppliers and local communities.

We also have a responsibility in the face of societal challenges, contributing to the fight against global warming, preserving all natural resources, promoting diversity and inclusion, ensuring respect for human rights throughout our supply chain.

We ask that our trading partners integrate environmental concerns into their activities and interactions in business. They undertake to apply the national and international conventions, standards, and regulations in force.

With the [EcoVadis rating of 77/100](#) obtained in October 2023, NTN Europe is one of the top 1% of rated companies for its CSR approach.

## 2. Slavery & Human Trafficking management within our organization

### a. Code of Ethics

In 2010, NTN Europe implemented a code of ethics describing in detail our fundamental ethical principles and the way in which we intend to conduct our operations within the group.

Its deployment is part of a process of continuous progress: we therefore published a new version in early 2020, complete and more enriched with examples to meet the legislative requirements of the "Sapin II" French law. Compliance with this code of ethics is enshrined in the Internal Regulations of NTN Europe, and in the event of non-compliance, sanctions are provided for.

This specific policy integrates the NTN Group's vision of ethics and compliance, especially the recommendations and procedures to ensure respect and protection of persons, and we are committed to ensuring that every employee is familiar with it. This Code of Ethics is transmitted to our business partners, who must adhere to our values.



## b. Trainings

We strive to make Group employees aware of ethics through training sessions lasting 2 hours for all newly hired employees within the company. The training rate for the 2023 fiscal year is 95%. All the necessary documentation is available on our Compliance Intranet which is accessible for all employees at any time.

Our goal is to reduce the risk of modern slavery taking place in our activities or our supply chains by sensitizing our employees on the main risks that may arise at any time.

## 3. Slavery & Human Trafficking management within Supply Chain

### a. Supply Chain management

NTN Europe is fully engaged in observing Human Rights guidelines and expects each of its suppliers and their own subcontractors, regardless of their country of residence, to implement the principles of the **International Labor Organization**.

This engagement implied to reject all forms of forced labor or modern slavery, to support the effective abolition of child labor, the elimination of harassment and discrimination in respect of employment and occupation, but also with the protection of employees against retaliation with a whistleblowing process, freedom of association and the right of collective bargaining.

NTN Europe expects its suppliers to favor initiatives that promote equality between men and women and to develop the diversity of teams in all its components: mix of ethnic and social origins, place given to young people and seniors, integration of disabled people.

Mining is an important source of revenue for many states. However, this same mineral wealth plays a major role in the persistence of insecurity in these countries. For example, if conflict minerals (tungsten, tantalum, tin, gold) are required for the function or production of a product, the supplier must declare his/her sources of procurement and must be able to justify this declaration.

NTN Europe encourages its trading partners to develop the skills of their employees. Professional training should be seen as a tool for performance, increasing the company's pool of talent, knowledge, and experience.

It is important for NTN Europe to have relationship with trade partners that integrates in their policies, activities, and interactions strong environmental concerns.

The process for deciding on our supplier panels is subject to validation by a committee which gives reasons for its decisions according to precise and transparent criteria. NTN Europe uses a globally recognized automated platform to assess suppliers against self-assessment questionnaires (SAQ) of 17 questions such as working conditions and human rights, health and safety, ...



## b. Sustainable Procurement Charter

Since 2016 NTN Europe has used a Collaborative and Sustainable Procurement Charter to reiterate its commitments in the field of business relations, ethics and the environment and to specify its requirements towards its suppliers.

In 2022, in a progress-making approach, NTN Europe rolled out a new Sustainable Procurement Charter to cover new topics on CSR aspects such as:

- Working conditions and Human Rights: wages and employee benefits, working conditions, harassment.
- Health and safety: Emergency preparedness, workplace ergonomics, chemical handling, fire protection.
- Business ethics: Privacy, financial accountability (accurate records), responsible information management, anti-competitive practices and anti-trust, prevention of corruption, conflicts of interest, counterfeit goods, export controls and economic sanctions, whistleblowing and protection against retaliation.
- The environment: Greenhouse gas emissions, Water quality and consumption, Air quality, Biodiversity, Consumer safety.

In 2023, the percentage of purchasing turnover covered by the sustainable purchasing charter had risen to 87%.

## 4. Due Diligences

NTN Europe is committed to assessing the risks associated with the region which are the most affected by human rights violations, particularly in relation to modern slavery.

To combat human rights abuses, we have initiated a KYC (Know Your Customer) and KYS (Know Your Supplier) approach. The goal is to better know our partners and to detect if the company, its shareholders, beneficial owners, or managers have been convicted, are listed in international sanctions or if they are politically exposed.

These results are shared periodically with sales/purchasing teams so that they can take stock of the associated risks and take the necessary measures.

## 5. Whistleblowing

NTN Europe have affirmed its commitment to fight against modern slavery by setting up a whistleblowing system which have been made available to all internal and external person in connection with NTN Europe, whether employees, beneficiaries, customers, suppliers, or any other partner of the Group, in addition to the usual alert methods.

This alert line is available to allow all stakeholders to report behavior potentially contrary to ethics and applicable rules via a specific organization for the collection and processing of alerts within NTN Europe through an alert procedure available to all and easily accessible to employees and external collaborators of the company from the website. This procedure guarantees the anonymity of employees.

## 6. Commitment

This statement constitutes NTN Europe S.A. and its two subsidiaries, NTN Wälzlager GmbH and NTN Bearings (UK) Ltd declaration in response to the Modern Slavery Act of 2015. It applies to fiscal year ending 31 March 2024.

It was approved by the Board of Directors on:

Name of the company:

NTN Europe

Represented by:

D. LAJILA

Date and signature:

08/05/2024



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