



1. Introduction

This statement sets out the steps we, JAE Europe Limited (JAE EU), have taken as a business to combat and eradicate issues relating to modern slavery and human trafficking both within our organisation and in our supply chain.

We recognise that the issues surrounding modern slavery and human trafficking are always changing and evolving and so we continue to strive to improve our processes, policies, rules and requirements to tackle these issues.

We are committed to upholding the highest of standards to remove modern slavery and human trafficking.

Our ethical policies are at the heart of everything we do and we have a zero tolerance approach to modern slavery and human trafficking. This applies to employees, workers, contractors, suppliers and agents.

2. Organisational Structure

We are a supplier of technology solutions and have successfully established 3 strong products lines in Connectors, User Interface Solutions and Aerospace. We form part of a group of companies all acting in the same sectors.

JAE EU's parent company is Japan Aviation Electronics Industry, Limited (JAE HQ). JAE HQ have its headquarters in Tokyo, Japan and within the group have over 9427 employees worldwide, while JAE EU itself employs 82 including temporary personnel at 31st March 2022.

For more information on JAE HQ corporate data see the following website pages:

- [Corporate Data | Company - Japan Aviation Electronics Industry, Ltd.](#)
- [Corporate Profile | Company - Japan Aviation Electronics Industry, Ltd.](#)
- [Business Overview | Company - Japan Aviation Electronics Industry, Ltd.](#)

3. Our Business

JAE EU's core business activities centre as a Sales/Distribution and Marketing/Engineering office and are segmented into business units such as;

- Automotive Connectors & Harnesses
- Aerospace, and
- Distribution, Industrial and Multimedia

Along with supporting functions such as Corporate Planning, Finance, HR, IT, Operations (including project management and Quality), Supply Chain and associative office administration and compliance functions.

4. Our Supply Chains

JAE EU does not directly manufacture any of its products nor has any direct involvement with procurement for the purposes of manufacturing.



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JAE EU only purchases and supplies products that have been manufactured directly within the JAE Group. JAE EU purchases its manufactured products from seven manufacturing entities within the group, these are JAE HQ, JAE Philippines, JAE Tijuana, JAE Oregon, JAE Wuxi, JAE Wujiang and JAE Taiwan.

Within a thriving office/sales based environment, JAE EU has a number of other suppliers to perform its operations efficiently. These suppliers will be supplying items such as stationery, food and beverages, furniture and office supplies, however within FY21 (April 2021-March 2022) JAE EU offices within Europe have been underutilised due to JAE EU continuing various safety protocols in relation to Covid 19, i.e. travel restrictions and ongoing working from home.

5. Our adherence to JAE-HQ Corporate Policies on Slavery and Human Trafficking

JAE EU is committed to ensuring that there is no modern slavery or human trafficking in our supply chain (operational and logistics structure) nor in any part of our business.

JAE EU does not specifically have a localised Anti-slavery policy, however we are wholly committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain or business.

For the purposes of aforesaid, JAE EU actively monitors and observes various JAE HQ corporate policies and guidance, these can be found at the following website pages:

- Basic policy for procurement | Procurement | Company- Japan Aviation Electronics Industry, Ltd.
- CSR Procurement Guideline | Procurement | Company- Japan Aviation Electronics Industry, Ltd.
- JAE Group Responsible Minerals Procurement Policy | Procurement | Company- Japan Aviation Electronics Industry, Ltd.

JAE EU in particular operates in strict accordance and compliance with JAE's Charter of Corporate Behaviour and JAE Commitment to Respect for Human Rights and labor., see some of the relevant sections of such policies which have been included in paragraphs 5.1-5.7 below";

5.1. Prohibition of Compulsory Labor

We shall employ all employees based on their free will, and shall not force employees perform compulsory labor.

- Employment based on their free will means employment based on a person's voluntary decision.
- Compulsory labor means any labor that is performed contrary to the will of the laborer.
- For example, it refers compulsory labor, bondage, non-voluntary and exploitative prison labor, slave labor or labor on human trafficking (including transfer and receipt of personnel by intimidation, abduction, fraud, or similar means).
- Compulsory labor includes work with no right to quit employment as well as seizure of original copies of government issued identification cards, passports, or work permits from employees and hinderance of the use of said documents by the owner.
- Furthermore, employment contracts need to clearly indicate working conditions in the language that employees can understand, and must not require employees to pay recruitment or other fees to the employer or employment placement companies.



5.2. Prohibition of Inhumane Treatment

We shall respect the human rights of employees and shall prohibit severe and inhumane treatment, such as abuse and harassment (abuse) of all kinds, etc.

- Inhumane treatment refers to sexual harassment, abuse, corporal punishment, insults, mental or physical coercion, etc.
- Regarding such matters, it is also important to stipulate applicable requirements, types and procedures of discipline in the employment rules, and display them for all employees to see.

5.3. Prohibition of Child Labor

We shall not employ a child who has not reached a minimum working age, and we shall not have them perform jobs that would compromise his or her sound development.

- A child is a person who is at the minimum age for employment or the age for mandatory education last year as prescribed by the laws and regulations of each country, or 15 years old, whichever is the highest age.
- Young workers are workers under the age of 18, and examples of laws and regulations that protect young workers from work that threatens their health and safety include restrictions on night labor and dangerous jobs, etc.
- Furthermore, student employees such as under internship contracts who work while enrolled in an educational institution, qualified education personnel or administrators shall be assigned, various records required by laws and regulations shall be maintained, and appropriate support and training must be offered.

5.4. Prohibition of Discrimination

We shall eliminate discrimination with respect to job offering and employment, and shall make an effort toward achieving fairness as to equal opportunity and treatment.

- Discrimination is defined as differential treatment of employment, remuneration, promotions, or education, not based on individual ability, aptitude, and achievement or similar objective characteristics.
- Factors for discrimination include race, skin colour, age, gender, sexual orientation, sexual identity, ethnicity, nationality, disabilities, pregnancy, religion, political affiliation, union membership, presence or absence of military service, heredity, marital status, etc. In addition, if a medical or physical examination is detrimental to equality in opportunity or treatment, it shall be regarded as a discriminatory act.

5.5. Appropriate Wage

We shall pay at least the legal minimum wage to employees, and shall make no unreasonable wage reduction.

- The minimum wage is the minimum wage mandated by the laws of the country of residence. In addition to guaranteeing this amount, other compensations are also necessary including overtime allowances and benefits required by law.



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- Furthermore, it is necessary to clearly inform all employees regarding the wage policies and pay dates in accordance with wage regulations, and to be able to confirm accurate remuneration based on payroll statements for wages paid each time for all employees.
- In addition, unfair wage reduction refers to “reduction of wages by deduction of amounts as disciplinary measures” and similar actions.

5.6. Work Hours

We shall manage work hours, holidays and vacations of employees in an appropriate manner in order to have work hours not exceed the legally prescribed limit.

- Appropriate management shall mean the following and similar actions.
 - Annually prescribed work days should not exceed the legally prescribed limit.
 - Weekly work hours (excluding emergency and abnormal situations) including overtime work hours should not exceed the legally prescribed limit.
 - A holiday (day off) should be given at least one day per week.
 - The right to annual paid leave should be given in compliance with the right specified by laws and ordinances.

5.7 Workers Right to Organise

We shall respect the workers right to organise as the means to induce negotiations between labor and management regarding subjects such as working environment, wage levels, etc.

- In accordance with the laws and regulations of each country, the right to organise and participate in labor unions based on the free choice of group members shall be respected, and collective bargaining shall be permitted.
- It is important for employees to be able to communicate with the management team, regarding administration and working conditions without discrimination, intimidation or retaliation, so that both parties could share issues with each other.

6. Due diligence processes and risk assessment

The predominant part of JAE EU’s supply chain is the logistics and supply/demand planning of products sold by JAE EU to its customer base. All products are manufactured internally within the JAE group (as described above) and so our activities as an office based sales environment are considered to be of lower risk in respect of modern slavery and human trafficking matters.

All JAE group companies are subject to the corporate policies as described and listed throughout this statement. All members of the JAE Group are held to the same high standard when it comes to ensuring that modern slavery and human trafficking plays no part in any of JAE’s activities, including those that supply parts and materials to JAE’s group companies to implement the same standard.

In recognition of the importance which JAE EU places on eradicating issues of modern slavery and human trafficking in respect of its workforce, JAE EU monitors and undertakes periodic reviews of its employee’s working hours and annual salaries for benchmarking purposes. This is to ensure not only that all relevant and applicable modern slavery and human trafficking laws are fully adhered to, but also that JAE EU remains fair and competitive in the markets in which it operates.

7. Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking.

If any of our third party suppliers are found to be in breach of any rules or regulations relating to modern slavery and human trafficking or do not adhere to the standards we set, we will attempt to assist them to rectify the issue and if there is a major breach, we will consider terminating the legal and commercial relationship with that business. Persistent breaches by any of our third party suppliers will also be treated seriously and again we will consider terminating the relationship in such instances.

All JAE manufacturing sites are accredited to ISO9001:2015 as a minimum or the higher IATF 16949:2016 standard. Sites producing automotive components are accredited to the higher IATF 16949:2016 standard.

To retain this accreditation, all sites & their associated remote functions & sales offices (JAE-EU included) are subjected to regular audits (both internally & from the external Certification Body) to ensure we comply with the required standards.

These standards relate to many best practice operational, systematic and people related processes, e.g. working conditions, resource planning, managing work-loads for employees, motivating employees and training/skills requirements for efficiencies.

In addition, many sites at which the JAE Group manufacture products are accredited to ISO14001 which is an environmental standard.

As a group, JAE is continually striving to improve its systems and processes to ensure there is no presence of any issues relating to modern slavery and human trafficking.

8. Training

We have implemented a system whereby all new employees of JAE EU are notified of the obligations imposed on them relating to modern slavery and human trafficking and we are committed to continually reviewing all and any methods, controls or otherwise that we have in place for the purposes of improvement. All new employees are directed to materials of all of JAE Group's policies which relate to them via JAE.Com website and JAE EU Intranet, including those listed in this statement. Employees are expected to read and adhere to those policies and raise any comments or questions they have.

This statement is made by JAE EU pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2022.

JAE EU Board of Directors has approved this statement.

A handwritten signature in black ink, appearing to read 'W. Oyamada'.

Wataru Oyamada, **Managing Director**
JAE Europe Limited