



HAMAMATSU PHOTONICS UK LIMITED

MODERN SLAVERY STATEMENT

Financial year 01-October-2024 to 30-September-2025
(issued in accordance with the Modern Slavery Act 2015)

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1. Introduction

This Modern Slavery Statement outlines the steps taken by Hamamatsu Photonics UK Ltd (“HPUK”) during the financial year 1 October 2024 to 30 September 2025 to prevent modern slavery and human trafficking within our operations and supply chains.

HPUK is committed to conducting business ethically, responsibly, and with integrity. We recognise that modern slavery is a serious global issue and we take our responsibilities seriously in identifying, preventing, and addressing any risks within our business and supply chain.

2. Our organisation and structure

Hamamatsu Photonics is a leading provider of cutting-edge photonics technology and products. With 70 years of experience, the company delivers innovative solutions to customers across a wide range of industries, including medical, scientific research, industrial, and telecommunications. Hamamatsu Photonics offers a comprehensive range of products, such as imaging sensors, light sources, and optical systems designed to meet customers’ unique needs.

Hamamatsu Photonics UK Ltd is a subsidiary of Hamamatsu Photonics K.K., a global leader in optoelectronic components, systems, and technologies. HPUK operates across the UK and Ireland, supplying advanced photonics products and technical expertise to customers in scientific research, medical diagnostics, industrial manufacturing, and related sectors. Some of our operations include:

- Sales, distribution, and customer support for photonics products
- Technical support for customers and approved distributors
- Collaboration with universities and research institutions
- Administrative, HR, and operational functions

We employ over 6,600 employees in offices around the world (as of Sep 2025). We manufacture and sell such equipment and apparatuses as well as delivers integrated solutions encompassing end products, services and components. Details of our company and business information can be found on the “Corporate Information” page of the Hamamatsu’s website: <https://www.hamamatsu.com/eu/en/our-company/corporate-profile.html>.

This statement applies to all employees, workers, contractors, and third parties acting on behalf of HPUK.

3. Financial overview

For the financial year 2024/2025, the financial information for HPUK shows:

- Turnover: £31,307,498
- Gross Profit: £11,028,908
- Profit After Tax: £2,466,553
- Employees: 72

For the consolidated group (covering the same FY 2024/2025 period):

- Net Sales: ¥212,051m
- Operating Profit: ¥16,163m
- Ordinary Profit: ¥18,802 million
- Profit Attributable to Owners: ¥14,203 million

These figures demonstrate the scale of the global organisation and the importance of strong governance across all subsidiaries, including HPUK.

4. Our supply chains

Our supply chains primarily include:

- Manufacturing and assembly operations primarily based in Japan
- Optoelectronic components and materials suppliers
- Technical and engineering service providers
- Logistics and distribution partners
- Recruitment and labour agencies.
- UK and EU suppliers providing logistics, facilities management, IT services, and professional services

While much of our supply chain is based in Japan and Europe, we recognise that certain regions and industries may present higher risks due to labour practices or local regulatory environments.

We operate our business in compliance with applicable laws and regulations, and we expect our suppliers to do the same, including the laws against modern slavery. Our expectations are set out in our Code of Conduct for Representatives and Suppliers.

In addition, we endeavour to include a provision within our purchase contracts with our suppliers, whereby suppliers are asked to warrant that in performing their contractual obligations they will ensure that they and their sub-contractors shall:

- comply with all applicable laws, statutes, regulations and codes relating to modern slavery, anti-bribery and anti-corruption, including but not limited to the Modern Slavery Act 2015, the Bribery Act 2010 and Hamamatsu Photonics UK Ltd Code of Conduct for Representatives and Suppliers;
- take reasonable steps to ensure that there is no slavery, human trafficking, bribery or corruption in their business or supply chains and that they have and maintain their own policies and procedures; and
- to promptly notify Hamamatsu Photonics UK Ltd as soon as they become aware of any actual or suspected slavery, human trafficking, bribery or corruption in their business or supply chains.

HPUK aims for a consistent approach when working with suppliers and that ethical trading considerations remain a critical factor when choosing our supply base and approval process.

5. Our policies

HPUK maintains a suite of policies that support our zero-tolerance approach to modern slavery, including:

- Code of Conduct
- Supplier Code of Practice
- Contractual clauses requiring supplier compliance with the Modern Slavery Act
- Ethical recruitment practices, including right-to-work checks
- Whistleblowing Policy
- Anti Financial Crime Policy
- Equality, Diversity and Inclusion Policy

These policies set clear expectations for ethical behaviour, legal compliance, and transparent reporting. These are reviewed annually and communicated to relevant staff and suppliers.

6. Due diligence

We are committed to acting ethically and with integrity in all our business dealings and to putting in place effective systems and controls which aim to ensure modern slavery is not taking place anywhere in our own business or in our supply chains. As part of this commitment, we focus on the welfare and safety of individuals at potential risk, undertake periodic due diligence reviews of our key suppliers and, where appropriate, provide support and guidance to help suppliers to address any concerns that they might have in their own business and supply chain.

In the UK, all personnel working for the company are required to supply relevant and up to date legal documents to provide proof of eligibility to work in the UK and age on the commencement of employment.

During Financial Year 2024/2025, we strengthened our due diligence processes by:

- Conducting supplier risk assessments focusing on geography, industry, and labour practices
- Requesting modern slavery declarations from key suppliers
- Reviewing and updating contractual terms to reinforce labour-standards expectations
- Monitoring higher-risk categories such as electronics components, logistics, and outsourced services

Where concerns arise, we engage directly with suppliers to seek assurance and corrective action.

7. Risk assessment

We assess modern slavery risks across:

- Supply chain tiers, particularly outside the UK/EU.
- Labour-intensive services such as cleaning, maintenance, and logistics.
- Recruitment practices.

For the reporting year, no confirmed instances of modern slavery were identified within our operations or supply chain.

8. Training and awareness

We consider it important to raise awareness and increase sensitivity on human rights risks among employees in order for our company to respond to human rights issues including modern slavery and human trafficking.

To ensure employees understand and can identify modern slavery risks, we provide:

- Mandatory training for HR, procurement and management teams.
- Awareness materials for all staff.
- Guidance on recognising signs of exploitation and reporting concerns.
- Updated copy of the Employee Handbook to all staff and all new starters receive a copy as part of their induction.

We continue to embed a culture of vigilance and ethical responsibility across the organisation.

9. Reporting concerns

To date, we have not identified any current suspected incidences of modern slavery in our supply chains.

We constantly strive to improve our systems and processes to ensure that modern slavery is not present in our supply chain or within our business. Our Board-level Sustainability Committee provides a direct overview of our Environmental, Social, and Governance (“ESG”) agenda. Modern Slavery prevention is one of the key areas under the Social section of the ESG agenda. To drive further progress in this area, we have taken the following actions:

- We revised and republished our Whistleblowing Policy annually, reissuing it digitally to all employees and is included in our Employee Handbook.
- We also ensure new employees receive a copy as part of their onboarding with Hamamatsu Photonics.
- We update and review all of our policies annually

10. Measuring effectiveness

We monitor our progress through:

- Supplier compliance rates and declarations.
- Employee training completion.
- Whistleblowing reports.
- Outcomes of supplier audits and risk assessments.

No concerns or incidents were raised during the reporting year.

11.Approval

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Hamamatsu Photonics UK Ltd's Modern Slavery Statement for the financial year 1 October 2024 – 30 September 2025.

It was approved by the Managing Director of Hamamatsu Photonics UK Ltd ("HPUK") on 01-January-2026



Name : Craig Palmer

Title : Managing Director

Date : 01-January-2026