



Approved by:  J Beaven General Manager		 <b>MinebeaMitsumi</b> <small>Passion to Create Value through Difference</small>  <b>United Kingdom</b>  <b>Human Resources Policy</b>		NMB-HR-POL067   Effective Date: 21.04.2022	
<b>Subject: Slavery and Human Trafficking Statement – Modern Slavery Act 2015</b>					
Iss 1	Original Issue	31 March 2016	C Bennett		
Iss 2	Annual review & change to corporate name & logo	31 March 2017	C Bennett		
Iss 3	Annual review	31 March 2018	C Bennett		
Iss 4	Amended to include statement on 'end of fiscal year'	31 Oct 2018	C Bennett		
Iss 5	Annual review	8 April 2019	C Bennett		
Iss 6	New format i.a.w published guidelines	30 May 2019	C Bennett		
Iss 7	Annual review	26 May 2020	C Hopkinson		
Iss 8	Annual Review	07 April 2021	C Hopkinson		
Iss 9	Annual Review	21 April 2022	C Hopkinson		

This **Modern Slavery and Human Trafficking** statement is made on behalf of **NMB-Minebea UK Ltd. (the Company)**.

This annual statement is made and published upon conclusion of the 2021/2022 fiscal year (31<sup>st</sup> March 2022) and pursuant to section 54(1) of the Modern Slavery Act 2015.

#### a) **The Company:**

**NMB-Minebea UK Ltd.** part of the 'MinebeaMitsumi Group' of companies, is situated two (2) miles west of Lincoln, England and forms part of the Rod End & Spherical, Fastener Business Unit dedicated to the design, manufacture and supply of self aligning rod end and spherical bearings for the worldwide aerospace, industrial and automotive sectors.

The company is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our procurement activities take place in England; and our contractors and suppliers are predominantly UK and EU based. These procurement activities include raw material suppliers and sub-contract processors (typically 70 to 100) representing >90% of our purchases.

#### b) **Policies & Procedures**

The Company operates a number of internal policies to ensure we are conducting business in an ethical and transparent manner; these include (but are not limited to):

1. Anti-slavery & human trafficking policy statement.
2. Recruitment Policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will, plus policies in relation to Young Persons at Work; Equal Opportunities etc.
3. Code of Business Conduct. This code explains the manner in which we behave as an organisation, and how we expect our employees and suppliers to act.
4. Corporate Code of Conduct. This code explains the measures for compliance with Labour, Health & Safety, Environment and Ethics & Business Practice for the Group Companies in addition to any company site specific policies and procedures.

5. Corporate Social Responsibility Policy. This policy sets out how we look to integrate our business values and operations to meet the expectations of our stakeholders - who include our customers, employees, investors, suppliers, the community and the environment.
6. Anti-Bribery. This policy sets out the company position on any form of bribery and corruption, and provides guidelines aimed at ensuring compliance with laws, rules and regulations as well as enabling employees and persons associated with the company to understand associated risks whilst providing secure means of reporting incidences.
7. Public Interest & Disclosure Policy. This policy and procedure is to provide safeguards to enable employees to raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

### **c) Due Diligence**

The Company operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier, whilst conducting annual surveys to report on their processes and due diligence taken to ensure that they and their supply chains remain complaint.

In addition to the above, as part of our contract with suppliers, we shall set out to ensure they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
5. We may terminate the contract at any time should any instances of modern slavery come to light.

### **d) Risk Management**

As part of our contract with suppliers, we undertake regular site audits to monitor compliance with company expectations and legal requirements, which includes a review of working conditions. We choose which facilities to audit based upon performance and risk assessments and if any issues are identified during an audit the supplier is required to prepare a corrective action plan and resolve all violations within an agreed and monitored time period.

### **e) Assessment of Effectiveness**

This fiscal year, 107 suppliers have been surveyed, providing 49 responses with statements of compliance, with 58 responses to be received.

### **f) Training**

The Company conducts a range of training initiatives, including but not limited to; induction, vocational and on-line training for employees, and covers our General Rules and the importance of acting with integrity and in line with our own internal Integrity and Conduct code.

The Company Disciplinary policy includes termination of employees found to be involved in any breach of the law banning forced labour, slavery and human trafficking.

Our procurement/buying team understand their obligations relating to modern slavery and actions to be taken if they suspect any violation is taking place within the supply chain and our 'Supplier Requirements' stipulated on purchase orders and published on the company website refers to compliance with this act.

NMB-Minebea UK Ltd. will continue to update its policies and procedures as required to ensure it maintains appropriate safeguards against any mistreatment of persons involved in its supply chain or own business.

### **Approval for this statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the **NMB-Minebea UK Ltd.** slavery and human trafficking statement.