

# NITTAN COMPANY, LIMITED

## Modern Slavery Statement

This statement has been published in accordance with the Modern Slavery Act 2015. ("MSA"). It sets out the steps taken by Nittan Co., Ltd during financial year ending 31st December 2016 to prevent modern slavery and human trafficking in its business or supply chains. As a result of the introduction of the MSA, our business needs to assess suppliers to ensure there are no signs of slavery or human trafficking being present, either within their organization

## Overview of Business and Supply Chain

Nittan Co., Ltd carries out the supply products, installation, maintenance of fire alarm and fire suppression systems. Our supply chain is comprised of leading companies with a proven and established track record in the supply of goods and services to the fire alarm and fire suppression market. Suppliers are assessed and "approved" on their ability to supply Nittan Co., Ltd with quality goods and services. Each Supplier goes through a vetting process and is then monitored, thereafter, for performance to certain criteria.

## Responsibility

The Directors and senior management team of Nittan Co., Ltd have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons working for us, or on our behalf, in any capacity comply with it.

## Our Policies

Nittan Co., Ltd is committed to an effective and comprehensive anti-slavery and trafficking policy as part of our compliance with the MSA. The MSA aims to crack down on practices that amount to "modern slavery", "servitude", "forced and compulsory labour" and human "trafficking". It includes exercising ownership over a person;

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coercing or threatening someone to perform work they would not do voluntarily; and arranging or facilitating another person's travel with a view to them being exploited (even where the person consents to the travel).

Nittan Co., Ltd has a zero tolerance approach to Modern Slavery of any kind within our operations and supply chain. We all have a responsibility to be alert to the risks, however small, in our business. Staffs are expected to report concerns, using the appropriate reporting channels, and management is expected to act upon them.

## MSA

Modern slavery can take many forms. These include (but are not limited to):

- 1) Forced work - for example through mental - or physical - threat;
- 2) Bonded work - where a person is forced to take a debt at the beginning of the working relationship and then kept in work until they have re-paid the debt (usually from their wages);
- 3) "Trafficked workers" - where workers travel from abroad and then forced or deceived into exploitative working arrangements at the place of destination;
- 4) Dehumanizing practices - where individuals are treated as a commodity or bought and sold as "property"; and
- 5) Workers being subject to physical constraints or limits on their free movement.

Nittan Co., Ltd operate its internal policies to comply with Human Rights and Code of Ethics where we confirm that we will not tolerate or condone abuse of human rights within any part of our business or our group supply chains and will take seriously any allegations that human rights are not properly respected.



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Furthermore, we will work closely with our main suppliers, with our employees in order to ensure the highest level of compliance with ethical trading initiatives.

All our group suppliers are required to comply with our specific ethical policies which require them to:

- Participate in ethical trading audits assessments;
- Provide employees with good working conditions, fair treatment and reasonable rates of pay; and
- Respect workers' human rights and comply fully with all applicable laws. The above policies also require that:
  - All work must be voluntary, and not done under any threat of penalties or sanctions.
  - Workers must not pay any deposits for work, and employers - whether labor users or recruiters - must not keep original copies of identity documents.
  - Indentured labor is prohibited, and workers must be free to leave work at any time, with all salary owed to be paid.

## Due Diligence

Nittan Co., Ltd are in the process of communicating to all our group suppliers of goods and services to establish whether they have an MSA Policy, are working towards a MSA Policy or have "best practice" controls in place. The results of these findings are documented and reviewed annually.

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## Risk Assessment and Management

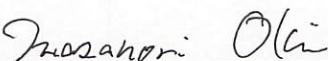
This year Nittan Co., Ltd will conduct regular Modern Slavery risk assessments within our own supply chains, implement appropriate controls to prevent Modern Slavery, and request the suppliers to notify Nittan Co., Ltd immediately if they become aware of any Modern Slavery within their supply chains. Suppliers which breach these obligations will face appropriate actions which could include termination of contracts.

## Training

Training is undertaken on the MSA at time of Induction and also in ongoing reviews. A MSA section on the Nittan "Intranet" where employees can read and update on the progress of any developments in this area will be prepared, incase necessary.

This statement was approved by the Board of Nittan Co., Ltd.

Masanori Oki

  
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President and Representative Director

Nittan Co., Ltd.