

Modern Slavery Act Transparency Statement

To be "a company that wins the confidence of society through our business endeavours" — this fundamental aspiration guides actions and decisions of all Seiko Group companies.

We are committed to strictly comply with all laws, regulations and international norms, including Universal Declaration of Human Rights and ILO Declaration on Fundamental Principles and Rights at Work. Seiko explicitly prohibits all forms of human and labour rights abuses and takes appropriate steps to ensure that modern slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Our Business Structure

This statement is published on behalf of Seiko UK Ltd. – the wholly-owned UK subsidiary of Seiko Watch Corporation (SWC), which is engaged in product planning and sales of watches for domestic and overseas markets. The parent company of SWC, Seiko Holdings Corporation is headquartered in Tokyo, from where it coordinates the activities of all consolidated companies, i.e. manufacturing, distribution and sales of watches, electronic devices, system solutions, clocks, luxury accessories and other products.

Seiko UK Ltd. controls the UK marketing, sales and service activities for the SWC brands – SEIKO, PULSAR and LORUS — as well as the distribution of clocks, electronic dictionaries, printers, musical accessories and other products, supplied by Seiko Group companies - SWC, SEIKO Hong Kong Ltd., SEIKO CLOCK (Hong Kong) Ltd. and Seiko Solutions Inc. Most of these products are manufactured by Seiko Epson (SE) and Seiko Instrument Inc. (SII), which is a SEIKO Group company.

Our Supply Chain

SE and SII manufacture watches, acoustic equipment (tuners, metronomes), printers, and other products, distributed by Seiko UK Ltd. These products are manufactured in Japan (by both SE and SII), China (by both SE and SII) and Singapore (SII).

The suppliers of components for SE products sold in the UK are located in Malaysia and Singapore, while those of the SII Group are based in Japan, Hong Kong and China. The most frequently procured goods include metal parts and circuit components. The number of suppliers for SE and the SII Group is 900 and 1,100 respectively.

Clocks and electronic dictionaries, which occupy only a small share in the total turnover of Seiko UK Ltd. are supplied by SEIKO CLOCK (Hong Kong) Ltd. and Seiko Solutions Inc.

Our Policies

Article 5 of "Action Guidelines for Corporate Ethics" of Seiko Holdings Corporation requires all executives and employees to "respect fundamental human rights and individual personalities" and to "strive to realize an environment that is healthy and safe, free from unfair discrimination and harassment."

In addition, Seiko UK Ltd. has issued the Employee Guide, stipulating the rules that aim to ensure ethical behaviour of all employees. The Guide is accompanied by the Harassment Policy and Procedures, which prohibit all forms of physical, sexual or mental harassment, and Procedures for Disclosure of Information, describing the steps to report violations of corporate ethics, including human rights abuses.

Steps to Prevent Modern Slavery and Human Trafficking

Seiko UK Ltd. validates the results of due diligence processes, carried out by its suppliers, SII and SE. Furthermore, it regularly monitors the activities of these companies to ensure that all relevant policies are duly followed and that human rights violations are not taking place in their operations or in the supply chains. The measures taken by SII to prevent human rights abuses, including modern slavery and human trafficking, are described below.

· Measures taken by SII

The SII Group implements its original Supplier Certification System, which covers law compliance, protection of human rights, environmental management, risk management and other criteria. Through this system, potential suppliers of the SII Group are asked to answer self-assessment questionnaires which include questions regarding the violation of human rights such as unfair labour and conflict minerals. The SII Group conduct businesses only with suppliers who are adequately certified upon assessment. By the end of FY2017, about two thousand suppliers in Japan and overseas were certified through this system.

These measures of Seiko Group companies are designed to ensure that modern slavery, human trafficking or other human rights abuses are not taking place in the supply chains of Seiko UK Ltd. and SWC. The executives of all operating companies are required to

familiarize themselves with the Group's Law Handbook, which clarifies their authorities and obligations related to the management of legal risks. All concerns related to law violations or corporate misconduct can be lodged through an anonymous whistleblowing system.

The SE Group also carries out measures to prevent the use of modern slavery by engaging in activities such as supplier due-diligence and monitoring. For further details, please see the link below.

Modern Slavery Act Statement for EPSON (UK)

<https://www.epson.co.uk/legal/modern-slavery-act-statement>

Training

Seiko Group requires all employees and executives to complete business ethics training and compliance training, as well as to familiarize themselves with all relevant laws and regulations, including those pertaining to human rights. Additionally, we plan to conduct employee training which will contribute to the prevention of modern slavery, starting next fiscal year.

This statement was approved by the Board of Seiko UK Ltd. on 2019/3/15.



David Edwards
Managing Director,

