

Modern Slavery and Human Trafficking Statement

Introduction:

This Modern Slavery and Human Trafficking Statement is made in accordance with and as a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31st March 2026.

Topcon is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero tolerance towards slavery and require our supply chain to comply with our values.

Our over all responsibility for identifying, assessing, and managing modern slavery risk and responding to modern slavery is overseen by the Regional President, EMEA.

Organisational Structure:

Topcon has business operations in the Asia-Pacific (APAC), the Americas, and Europe including the United Kingdom.

We operate in the Ophthalmic medical device and software sales and service sector. The nature of our supply chains is as follows:

We work with a number of key manufacturers and distributors who supply use with but not limited to Ophthalmic medical devices and software for us to see in a worldwide market.

For more information see:

<https://topconhealthcare.com/>

<https://topconhealthcare.eu/>

Policies:

We operate a number of policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

Recruitment and Selection Policy –

Our recruitment and selection policy ensures all legally required steps are taken and any new employee is not a victim of modern slavery.

Supplier Code of Conduct –

Our supplier code of conduct ensures our suppliers that preventing modern day slavery is important to us, and it is expected that they take required actions to uphold our commitments and values.

<https://global.topcon.com/about/governance/code/business/>, Chapters 1 and 7

Whistleblowing Policy –

Our whistleblowing policy ensures there is a route for staff to raise any concerns they might have and covers multiple areas of reporting including Human Rights, or which Modern day slavery is a part of.

https://global.topcon.com/sustainability/governance/reporting/?doing_wp_cron=1781873940.7509880065917968750000

Staff Code of Conduct –

Our Global Code of Conduct highlights the company's position on modern day slavery and via yearly training, this ensures all employees are aware of our business commitments and values. <https://global.topcon.com/about/governance/code/>, Chapter 4.1

Procurement Policy –

Our procurement policy details what steps should be taken when onboarding a new supplier or auditing an existing supplier and highlights modern day slavery as an area to be observant of.

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence:

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chain, we have adopted the following due diligence procedures:

- Internal Supplier Audits
- External Supplier Audits

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains.
- Engage with workers and suppliers.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide adequate grievance mechanisms and protection for whistleblowers.

Risk and Compliance:

UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.

We do not consider that we operate in a high-risk environment because:

- The risk level of low has been decided by evaluating our supply chains.
- We have also used the yearly completion of the UK Government Modern Slavery Assessment Tool (MSAT), to assist with risk, compliance, and KPI's.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance, or risk us moving our business elsewhere.

Effectiveness:

Topcon and supply chain KPI's are as follows:

- We will contact suppliers to enquire about their modern day slavery policies every 12 months.
- We will train our staff about modern day slavery issues and increase awareness.
- We will carry out a regular audit of suppliers and aim to cover +50% each year.
- Completing the UK Government MSAT yearly and reviewing the results.

Training staff:

Training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.

Next Steps:

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking by:

- Compliance questionnaires for suppliers.
- Increase amount of yearly supplier audits.
- Complete more on-site audits.

This statement was approved by the Regional President, EMEA.

Name and Signature:

Joe Keenan

Signed by:

A handwritten signature in black ink that reads "Joe Keenan". The signature is written in a cursive style with a large 'J' and 'K'.

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Date:

24/06/2026