SUMITOMO ELECTRIC GROUP

SEPE Group: SEI Interconnect Products (Europe) Ltd. - SEI Identification Solutions Ltd. - Heinrich Thulesius GmbH & Co. KG

Statement on Slavery and Human Trafficking for Financial Year 2024-2025

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Introduction

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and outlines the measures being taken by **SEI Interconnect Products (Europe) Ltd,** including **SEI Identification Solutions Ltd.** and **Heinrich Thulesius GmbH & Co. KG** (together "**SEPE Group**") to prevent modern slavery and human trafficking ("**Modern Slavery**") in our business and supply chains during the financial year 2024-2025.

The SEPE Group is part of the larger Sumitomo Electric Group ("**SEG**") of companies, SEG, in accordance with its corporate philosophy which consists of the Sumitomo Spirit and the Corporate Principles, strives to be a group of companies worthy of society's trust by conducting its business activities in an honest manner.

SEG recognises that ethical labour practices, including modern slavery prevention, are fundamental to the group's success, sustainability, and integrity and have outlined labour and employment activities on the group **CSR portal.** These are not just aspirational commitments, but policies which demonstrate our practical processes in ensuring an ethical work place is a reality.



The Sumitomo Spirit encourages all employees, officers and directors ("**Employees**") to:

- **Banji-nissei** - do their best not only in business, but in every aspect of their lives;
- **Shinyo-kakujitsu** - place importance on integrity and good management; and
- **Fusu-furi** - never sacrifice integrity for easy profit.

Additionally, each company of SEG shall commit to drive their business based on key corporate principles:

- Offer the very best goods and services to satisfy customer needs;
- Build technical expertise, realise changes and strive for consistent growth;
- Contribute to creating a better society and environment, with a firm awareness of our social responsibility;
- Maintain high corporate ethics and strive to become a company worthy of society's trust; and
- Nurture a lively corporate culture that enables employee self-improvement.

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1. Organisational Structure, Business & Supply Chains

Our Business

The SEPE Group is a subsidiary of Sumitomo Electric Industries, Ltd. ("**SEI**"), which itself forms part of the Sumitomo Electric Group. SEI is a Japanese manufacturer of electrical wire, optical fibre cables, electronics and hard metal products established in 1897. SEI's headquarters are in Osaka, Japan.

The SEPE Group operates the European sales and distribution network of SEG's broad spectrum of electronic wire products and new technologies. The products sold and distributed by the SEPE Group are used in consumer electronics, industrial, automotive, data transmission, telecommunications, medical, environment, railway and aerospace applications. As of August 2025, the SEPE Group has 93 employees across seven facilities located in the United Kingdom, France, Germany and Italy.

Supply Chain Overview

The SEPE Group's global supply chain operates worldwide and sources products from the SEI Electronics Division companies to service the European market for these products; its consolidated turnover is approximately €61.9 million. The SEPE Group's supply chains encompass multiple tiers, including direct and indirect suppliers of raw material and components, and administration services such as HR, facilities management and logistics.

We actively map our supply chains—both material and labour—focusing on identifying high-risk industries, countries, and stages (e.g., raw material extraction). This includes understanding recruitment practices and sourcing of migrant workers.

2. Organisational Policies

Corporate Governance & Oversight

The Corporate Social Responsibility Committee ("**CSR Committee**"), formed of senior management from SEG, is committed to ensure the best strategy for supporting and advancing human rights, including abating modern slavery risks, in all the communities where SEG operates. Each year the CSR Committee describes the measures taken by SEG to further strengthen its corporate social responsibility and SEG complies with and expects its suppliers to comply with the Corporate Social Responsibility Basic Policy.

Code of Conduct & Supplier Code of Conduct

Our SEG Global Code of Conduct prohibits all forms of modern slavery and is available in over 30 languages. It sets clear standards for all employees and business partners. Awareness and understanding of the Code of Conduct is promoted to Employees by face-to-face training, e-learning and effective internal communication.

The Supplier Code of Conduct ("**SCoC**"), adopted in 2021, contractually binds suppliers to upholding ethical labour standards, human rights, and zero tolerance for modern slavery. Non-compliance can result in contract termination.

Human Rights Policy & Due Diligence

Guided by the UN Guiding Principles and international standards, SEG's Global Policy on Human Rights commits to continuous improvement and thorough due diligence, integrating these standards into decision-making and supplier relationships. The Human Rights Policy applies to the SEPE Group as a subsidiary of SEG. SEG also expects all business partners related to its business activities to comply with the Policy.

3. Assessing and Managing Risk

Risk Assessment Process

SEG uses a risk assessment framework that covers all tier 1 and high-risk tier 2 parties of our supply chain, including suppliers, subcontractors, and support functions. In FY 2023-2024, an independent

review focused on migrant worker conditions and confirmed low risks overall, while identifying specific improvement areas in relation to migrant workers which we have been able to address in FY 2024-2025. Risk assessments undertaken have shown there is no evidence of forced labour in our workforce or labour supplier chain and no incidences of child labour.

Risk Prioritisation and Management

Risk is prioritised monitoring regulatory demands and using geographic, sectoral, and labour vulnerability factors. We engage local experts, NGOs, and legal advisors to validate findings and plan actions as necessary.

We have also developed day-to-day commercial practices which support risk management; The SEPE Group requires high risk suppliers to agree to and comply with legal compliance and ethical conduct terms, including, by accepting the SCoC in commercial contacts, or adhering to enhanced modern slavery clauses.

Incident Example and Remediation

SEG proactively addressed the payment of recruitment fees to third parties by migrant workers. During our review, we identified an area for improvement within one of our SEG group companies in Hungary. It was discovered that, unbeknownst to the SEG company, some migrant workers had paid recruitment fees to third-party agencies—contrary to SEG's zero-recruitment fee commitment under our Global Migrant Worker Policy.

Restitution has since been made to the affected workers. Following legal consultations, the SEG group company has taken further steps to prevent recurrence and reinforce ethical recruitment practices. These include:

- Educating current recruitment partners on modern slavery risks and their legal obligations.
- Strengthening existing contracts with enhanced modern slavery clauses to ensure compliance and accountability.
- Introducing in contracts an external Migrant Worker Policy for third-party recruitment agencies, clearly outlining their responsibilities under modern slavery legislation.

SEG remains committed to continuous improvement, robust oversight, and ensuring that all operations and partners uphold our ethical standards and legal obligations.

4. Due Diligence in Relation to Modern Slavery

Supplier Due Diligence

As part of the SEG Compliance Programme, new and current business partners must go through the Human Rights Due Diligence process in order for SEG to be assured that the business partners it engages with meet the required standards of ethical conduct. To ensure that SEG's initiatives are promoted in line with the Human Rights Policy, adverse media report scanning and fact-finding investigations are conducted regularly of our high-risk stakeholders, including domestic and overseas affiliates. Where modern slavery indicators are flagged, we carry out enhanced checks. We monitor higher-risk suppliers through regular reviews and follow-ups to ensure compliance and drive continuous improvement across our supply chain.

We have encountered suppliers with history of ethical labour concerns, and in such relationships, insured the inclusion of enhanced modern slavery clauses and sought non-negotiable compliance with the SCoC. All prospective and existing suppliers undergo human rights due diligence and must comply with SCoC requirements. Contractual clauses allow termination for modern slavery violations.

SEG continues to develop internal expertise and alignment with the Corporate Sustainability Reporting Directive in the EMEA region and provided training to senior management. In addition, SEG continues to advance its relationship with external vendors, including trialling due diligence software to support supply chain monitoring, human rights due diligence and mitigate risks related to modern slavery within the SEPE Group supply chain.

Monitoring and Audits
We monitor supplier compliance via audits, media screening, and performance reviews, with worker interviews and third-party verifications for accuracy. Specifically, the SEG HR team conducts periodic reviews of its supply chain via a questionnaire to its group companies designed to scan risks around unethical labour practices and modern slavery (including child labour, forced labour, and migrant worker issues) in the labour supply chain. When risks are identified the business concerned is scrutinised further.

Grievance and Remediation Mechanisms
The SEPE Group encourages suppliers to establish grievance channels. Internally, an externally operated whistleblowing hotline (Navex) provides protected channels for employees and business partners to report concerns. We regularly analyse and periodically audit our whistleblowing reports to track trends, remedial action and develop more-focused training on key issue areas.

5. Training
Training is provided regularly within SEG to build awareness of unethical conduct including human rights abuses, bullying and harassment and modern slavery. All employees at SEG receive ongoing training on the SEG Code of Conduct which, includes express references to the Human Rights Policy, anti-harassment training, whistleblowing and our new workplace culture training in the EMEA region. Customised training is provided to employees operating in relevant risk areas.

6. Monitoring and Evaluation: Understanding and Demonstrating Effectiveness

Performance Indicators
KPIs include:

- Percentage of suppliers signed up to SCoC
- Number of due diligence assessments conducted
- Number and outcome of whistleblowing reports related to modern slavery
- Rate of completed employee training

Continuous Improvement
SEG reviews and updates policies and practices every year, drawing on risk assessments, incident outcomes, stakeholder feedback, and evolving legal standards (such as the EU Corporate Sustainability Due Diligence Directive). Our standard modern slavery clauses continue to be reviewed on a periodic basis to ensure they remain robust and fit for purpose. For FY 2024-2025, SEG is focusing on strengthening its SCoC to ensure alignment with the forthcoming CSRD and updating its Human Rights Policy and due diligence processes.

Whistleblowing and Speak up Culture
SEG continues to promote a 'speak up' culture that encourages a workplace where Employees feel comfortable raising concerns about unsafe, unethical or unlawful practices. This 'speak up' culture is facilitated, in part, by an external whistleblowing hotline (operated by Navex), with an option of anonymity, for Employees or business partners to raise their concerns. The SEG Code of Conduct and Whistleblowing Policy prohibit retaliation against those that raise concerns of unsafe, unethical or unlawful practices.

Reports raised internally or via the external hotline are used to measure the effectiveness of training and the levels of awareness and understanding of Employees of unethical practices including on Modern Slavery.

SEG has also committed to prioritising investigations related to human rights, modern slavery and employee issues with a view to completing such investigations in the shortest time possible In FY 2024-2025 there were no reported concerns of modern slavery.

Intent and Commitment

SEG and the SEPE Group are steadfast in its responsibility to respect and strengthen human rights across its global operations and supply chains; and we also remain committed to supporting suppliers in assessing and addressing modern slavery concerns in their business and supply chains.

This statement has been approved by the SEPE Group management team.

N. Perkins

Neil Perkins

Managing Director

Date: 22 September 2025