

JAE EU - Modern Slavery & Human Trafficking Statement 2025

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Document Title	Modern Slavery & Human Trafficking Statement 2025
Responsible Role & Department	HR Director, Human Resources
Official Approval	JAE EU Board of Directors
Date of Approval	6th June 2025
Operational Period	1st April 2024 – 31st March 2025 (FY24)
Review Period	May 2025
<p>Summary:</p> <p><i>This statement is designed to satisfy the requirement Section 54 of Part 6 of the Modern Slavery Act 2015 which mandates that certain commercial organisations publish an annual "slavery and human trafficking statement" detailing:</i></p> <ul style="list-style-type: none"> <i>steps taken to prevent modern slavery in their supply chains and business.</i> <i>This statement must be signed by a senior executive and prominently displayed on the organisation's website</i> 	

Introduction

Within JAE EU we recognize that the challenges related to modern slavery and human trafficking are continually evolving, and we are dedicated to continuously improving our processes, policies, and practices to address these issues.

Our ethical standards are the foundation of everything we do, and we uphold a strict zero-tolerance policy toward modern slavery and human trafficking. This commitment extends to all employees, workers, contractors, suppliers, and agents who work with us.

Organisational Structure

We are a supplier of technology solutions and have successfully established three strong products lines in Connectors, User Interface Solutions and Aerospace. We form part of a group of companies all acting in the same sectors.

JAE EU's parent company is Japan Aviation Electronics Industry, Limited (JAE HQ). JAE HQ have its headquarters in Tokyo, Japan and within the group have over 10154 employees worldwide, while JAE EU itself employed 82 members of staff as of 31st March 2025.



For more information on JAE HQ corporate data see the following website pages:

- [Corporate Data | Company-Japan Aviation Electronics Industry, Ltd.](#)
- [Corporate Profile | Company -Japan Aviation Electronics Industry, Ltd.](#)
- [Business Overview | Company-Japan Aviation Electronics Industry, Ltd.](#)

Our Business

JAE EU's core activities focus on Sales, Distribution, Marketing, and Engineering, organized into business units such as:

- Connector Business Development (Connectors, Harnesses and Antennas) for various industries such as Automotive and Industrial Electronics
- Aerospace Sensors

Along with support functions including Corporate Planning/Operations, Finance, HR, IT, Supply Chain/business planning, Connector New Business and office administration and compliance.

Our Supply Chains

JAE EU does not directly manufacture any of its products. Instead, we procure and distribute products that are manufactured by entities within the JAE Group or by approved external partners.

JAE EU sources its products from seven key manufacturing entities within the JAE Group: JAE Headquarters (HQ), JAE Philippines, JAE Tijuana, JAE Oregon, JAE Wuxi, JAE Wujiang, and JAE Taiwan. In addition, we work with a third-party assembly partner based in Serbia. To ensure compliance with the Modern Slavery Act 2015, JAE EU undertakes thorough due diligence on all manufacturing entities and partners. These companies are subject to regular audits—either as part of the Group-wide compliance program or through localised initiatives—to confirm adherence to our ethical standards and legal obligations.

In addition to its manufacturing supply chain, JAE EU relies on a range of other suppliers to support the efficient operation of its office and sales-based environment. These suppliers provide essential items such as stationery, food and beverages, furniture, and other office supplies. JAE EU has 2 office-based premises, its European Headquarters in Aldershot Hampshire (United Kingdom) & Hilden Dusseldorf (Germany).

Office occupancy increased steadily during FY24, following an earlier IT issue during latter part of FY23. Operations experienced a successful reintegration into the workplace, JAE EU has implemented a hybrid working model at its UK Headquarters. Under the current policy, employees are required to work a minimum of two days per week from the office, with the remaining three days based at home. This model has been widely adopted by the majority of personnel.

Responsibilities

To safeguard the effective implementation of this policy and statement, JAE EU has clearly established responsibilities throughout the organisation:

- **Senior Management Team:** Responsible for ensuring that JAE EU and all of our business partners comply with all legal and ethical obligations, including those related to combating modern slavery.
- **Human Resources & General Affairs Department:** Responsible for raising awareness among staff and management regarding our obligations, as well as the controls and processes in place to meet those obligations.
- **Management at All Levels:** Responsible for ensuring that all team members under their supervision receive adequate and regular training, fully understand our commitments, and consistently comply with them.

Monitoring

During FY24, there were no reported cases of modern slavery or human trafficking within JAE EU operations. However, we remain vigilant and are committed to continuous improvement. We will not become complacent; instead, we will uphold and enhance our safe, legal,

and ethical practices while striving to advance our efforts in this critical area.

Our adherence to JAE-HQ Corporate Policies on Slavery and Human Trafficking

JAE EU is committed to ensuring that modern slavery and human trafficking are not present in our business or supply chains.

While JAE EU does not currently have a standalone, localised anti-slavery policy, we are dedicated in our commitment to ethical conduct and integrity in all aspects of our business operations. We actively implement and enforce robust systems and controls to prevent modern slavery and human trafficking from occurring within our organisation or among our suppliers.

For the purposes of aforesaid, JAE EU actively monitors and observes various JAE HQ corporate policies and guidance's, these can be found at the following website pages:

- Basic policy for procurement | Company-Japan Aviation Electronics Industry, Ltd.
- JAE Group Sustainable Procurement Guideline | Company-Japan Aviation Electronics Industry, Ltd.
- JAE Group Conflict Mineral Policy | Company- Japan Aviation Electronics Industry, Ltd.
- JAE Group Green Procurement Guideline | Company- Japan Aviation Electronics Industry, Ltd.

JAE EU operates in strict accordance with the **JAE Group Charter of Corporate Behaviour** and the **JAE Commitment to Respect for Human Rights**. Relevant excerpts from these policies are provided below to demonstrate our alignment and commitment.

Elimination of Discrimination and Inhumane Treatment

We are committed to fair and inclusive employment practices. Discrimination of any kind—based on race, colour, age, gender, sexual orientation, gender identity, ethnicity, national origin, disability, pregnancy, religion, political views, union membership, veteran status, genetic information, or marital status—is not tolerated in our hiring, compensation, promotion, or training practices. We do not conduct medical tests or physical examinations that could result in discriminatory outcomes. We are also committed to preventing all forms of inhumane treatment in the workplace, including sexual harassment, abuse, corporal punishment, verbal abuse, or physical and mental coercion. Disciplinary procedures are clearly defined, regulated, and communicated to all employees.

Prohibition of Child Labour

We do not employ anyone under the legal minimum age, or under 15, whichever is higher. Workers under 18 are not assigned hazardous tasks. Student workers are properly supported, managed, and trained in accordance with legal standards. In FY24, JAE EU did not employ or engage with any person under the age of 18.

Prohibition of Forced Labor

We do not use forced, bonded, or trafficked labour. Employees retain access to their personal identification documents, are not charged recruitment fees, and are provided with employment terms in a language they understand.

Appropriate Working Hours and Proper Wages

We comply with all local laws regarding working hours and ensure wages meet or exceed legal minimums, including appropriate overtime pay. All employees receive clear wage information and are protected from unlawful deductions.

Freedom of Association

We respect employees' rights to form or join trade unions and engage in collective bargaining. Open communication with management is encouraged and safeguarded from retaliation.

Due diligence processes and risk assessment

The primary focus of JAE EU's supply chain is the logistics and planning of products sold to customers. All products are manufactured within the JAE Group or by a single third-party partner, making our office-based sales environment relatively low-risk regarding modern slavery and human trafficking. We conduct thorough risk assessments before engaging with any company and perform regular audits to ensure compliance.

All JAE Group companies and third-party partners are held to the same corporate policies outlined in this statement. Everyone associated with JAE EU is expected to uphold high standards to ensure modern slavery and human trafficking are not present in any aspect of JAE's operations, including in the supply of parts and materials.

JAE EU also monitors and periodically reviews employee working hours and salaries to ensure compliance with modern slavery laws and maintain fairness and competitiveness within the market.

Supplier adherence to our values and ethics

If any third-party suppliers breach rules related to modern slavery and human trafficking or fail to meet our standards, we will work with them to resolve the issue. In cases of major breaches or persistent non-compliance, we will consider terminating our legal and commercial relationship with that supplier.

All JAE manufacturing sites are accredited to at least ISO 9001:2015, or the higher IATF 16949:2016 standard for automotive components. To maintain this accreditation, sites—including JAE EU—undergo regular internal and external audits to ensure compliance with operational and people-related best practices, including working conditions, employee training, and resource planning. Additionally, many JAE Group sites are accredited to ISO 14001 (an environmental standard) and there are various other certifications also within the group such as ISO/IEC 17025:2017, ISO 45001:2018 and JIS Q9100. These can be viewed via JAE.Com website.

As a group, JAE continually works to improve its systems and processes to eliminate modern slavery and human trafficking risks.

Training

JAE EU ensures that all new employees are informed of their obligations regarding modern slavery and human trafficking. We are committed to continuously reviewing and improving our methods and controls. New employees are directed to relevant JAE Group policies via the JAE.com website and JAE EU Intranet, including those referenced in this statement. Employees are expected to familiarise themselves with these policies, comply with them, and raise any questions or concerns.

Next Steps & Ongoing commitments

We are committed to;

- upholding the highest of standards to remove modern slavery and human trafficking
- reviewing and updating our policies, including update to Whistleblowing policy/Code of Conduct in FY25 and new addition of Diversity and Inclusion policy
- ensuring improvements are made each year on modern slavery and human trafficking and documented within our statement
- implementing mandatory training for All JAE EU personnel to raise awareness and provide greater insight on 'how' they can identify and 'prevent' slavery and human trafficking, and how to report concerns (ensuring 100% completion).
- proudly continuing to display its Modern Slavery and human trafficking statement via our website (as seen in picture below)

JAE Europe, Ltd.

Sales

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JAE Europe, Ltd. Modern slavery and human trafficking statement (PDF: 549KB) 



Summary Statement

This statement is made by JAE EU pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2025.

Internal & Board level approval and sign off

This statement has been thoroughly checked, approved and signed off by JAE EU Internal Senior Management Team, & Officially by JAE EU Board of Directors

Koichi Tomizuka, Managing Director JAE Europe limited