



Komatsu UK Ltd

Slavery and Human Trafficking Statement for the Financial Year 2025

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the **Act**) and sets out the steps taken by Komatsu UK Limited (**KUK**) during the financial year from 1 April 2025 to 31 March 2026 to identify, assess and address the risks of slavery, servitude, forced or compulsory labour and human trafficking (together referred to in this statement as **modern slavery**) within its business and supply chains.

KUK recognises that modern slavery risks can arise in both an organisation's own operations and its supply chains, including through complex and multi-tiered international supply chains. KUK is committed to continuing to develop its approach to identifying and managing these risks.

This statement builds on KUK's previous modern slavery statements and reflects the activities undertaken during the financial year ended 31 March 2026 and the areas in which KUK intends to continue developing its approach.

1. Organisation, Business and Supply Chain

KUK is part of the global Komatsu Group, whose head office is in Tokyo, Japan. KUK manufactures medium-sized hydraulic excavators, which are sold mainly to the European market.

KUK operates with a global supplier base comprising approximately 74 direct suppliers providing parts, services and equipment. Its supply chains can be extensive and may involve a number of tiers between the sourcing of raw materials, manufacture of components and delivery of finished components to KUK.

KUK's principal visibility is over its direct suppliers. KUK recognises that visibility of suppliers and working practices further down complex supply chains is more limited and that modern slavery risks may arise at different stages of those supply chains.

KUK's approach has historically concentrated principally on its direct suppliers. As part of the continuing development of its approach, KUK will seek to improve its understanding of modern slavery risks both within its supply chains and in relevant services supporting its own operations.

2. Policies and Standards

KUK management is committed to conducting business ethically and with integrity and to maintaining systems and controls intended to prevent and identify modern slavery within KUK's business and supply chains.

KUK expects its suppliers to conduct their businesses in accordance with applicable laws and appropriate standards relating to human rights and labour practices.

These expectations are supported by the KOMATSU Way, Komatsu's Worldwide Code of Business Conduct and KUK's Supplier Handbook.

The KOMATSU Way and Komatsu's Worldwide Code of Conduct

Komatsu defines its corporate value as "the sum total of the trust given to us by all our stakeholders and society".

The KOMATSU Way sets out the mindset, beliefs, values and standards of conduct expected of Komatsu Group employees. It requires compliance with applicable laws and rules of the business community.

These principles are supplemented by Komatsu's Worldwide Code of Business Conduct (the **Code**). All employees are required to follow the Code and training in the Code is mandatory.

In relation to employment, the Code provides that Komatsu Group companies shall not tolerate child labour or forced labour. Where a deviation from the Code is identified, an appropriate investigation and remedial action are required.

KUK's Supplier Handbook has also been revised to reinforce KUK's expectations of its direct suppliers concerning modern slavery and human trafficking.

3. Assessing and Managing Modern Slavery Risk

KUK recognises that effective management of modern slavery requires consideration of the risks to potentially affected workers and cannot rely solely upon supplier assurances.

KUK undertakes an annual review of its supply chain using factors including PESTLE analysis, product type and company ownership to support its assessment of supplier risk.

KUK recognises that modern slavery risk assessment continues to develop and that relevant risk factors may include the location and nature of activities undertaken within a supply chain, the type of goods or services being supplied and the characteristics of the workforce involved.

During the financial year, KUK continued to use its existing risk assessment processes together with its programme of supplier engagement, site visits and audits to assist in identifying potential concerns.

No instances of modern slavery were identified through these processes during the financial year. KUK recognises, however, that the absence of identified cases does not itself establish that no modern slavery risk exists within a complex supply chain. KUK will therefore continue to review and develop its approach to risk identification.

4. Due Diligence and Supplier Management

Since 2016, KUK has continued to develop its compliance activities relating to modern slavery.

Measures in place during the financial year included:

- **Annual Risk Assessments:** KUK's supply chain was reviewed using its existing risk assessment methodology, including consideration of PESTLE factors, product type and company ownership.
- **Site Visits and Supplier Audits:** KUK maintained a structured programme of supplier visits and audits intended to monitor supplier standards and identify potential concerns.
- **Supplier Declarations:** KUK's suppliers and on-site contractors have provided written confirmation of compliance with the Act. Where applicable, copies of suppliers' own modern slavery statements have also been obtained.
- **Supplier Standards:** KUK's Supplier Handbook communicates KUK's expectations concerning modern slavery and human trafficking to its direct suppliers.

KUK recognises that declarations and contractual requirements are only part of an effective due diligence process. Its supplier visits, audits and ongoing supplier relationships provide further opportunities to identify indicators of inappropriate labour practices and to raise concerns where necessary.

Where concerns are identified, KUK's response will depend upon the nature and seriousness of the circumstances. KUK will seek appropriate investigation and corrective or remedial action and, where appropriate, engagement with the supplier concerned.

Where a supplier is unwilling or unable to take appropriate action to prevent or address serious human rights abuses, KUK reserves the right to suspend or terminate the business relationship. In determining the appropriate response, KUK will consider the potential consequences for affected workers and seek to avoid action which could unnecessarily increase their vulnerability.

5. Training and Awareness

KUK considers employee awareness important to the identification and management of modern slavery risk.

All members of KUK's purchasing team have completed e-learning training focused on modern slavery in procurement.

Komatsu has also provided internal training concerning modern slavery and human rights to KUK employees, with additional training for procurement staff intended to improve awareness, risk identification and preventative measures.

KUK intends to continue providing appropriate refresher training to relevant employees and to develop awareness of modern slavery risks as its approach evolves.

6. Reporting Concerns and Remediation

KUK has established channels through which employees can report suspected breaches of the Code, including information concerning potential human rights violations and infringements of labour standards.

No instances of child labour or forced labour were reported or alleged through these channels during the financial year ended 31 March 2026.

If KUK becomes aware of a credible modern slavery concern within its own operations or supply chain, it will seek to investigate the circumstances and determine an appropriate response. Depending upon the circumstances, this may include engagement with the relevant supplier or other party, corrective or remedial measures and escalation within KUK or the wider Komatsu Group.

KUK recognises that the interests and safety of potentially affected workers should be considered when determining the appropriate response to an identified concern.

7. Monitoring Effectiveness and Continuous Improvement

KUK monitors the operation of its modern slavery controls through its annual risk assessment, supplier engagement, site visits and audits, supplier declarations, employee training and internal reporting arrangements.

No instances of modern slavery were identified or reported through these processes during the financial year.

KUK recognises that measuring activity alone does not necessarily demonstrate that modern slavery controls are effective. It also recognises the importance of developing its approach over time as its understanding of risks within its operations and supply chains improves.

During the financial year, KUK continued the measures established in previous years, including supplier risk assessment, supplier visits and audits, supplier declarations, employee training and reinforcement of the standards contained in its Supplier Handbook.

KUK's next stage of development will be to consider how its existing activities can provide a clearer assessment of modern slavery risk and the effectiveness of the measures taken to address it.

8. Further Steps

During the financial year ending 31 March 2027, KUK intends to continue developing its approach to modern slavery, proportionate to the nature of its business and supply chains.

Its areas of focus will include:

- **Risk Assessment:** continuing the annual assessment of its supplier base while considering how modern slavery-specific risk factors can be more clearly incorporated into that assessment;
- **Supply Chain Understanding:** seeking to improve KUK's understanding of modern slavery risks within relevant areas of its supply chain, recognising that its current visibility is greatest at direct supplier level;
- **Supplier Due Diligence:** continuing supplier site visits and audits, with attention directed towards suppliers or activities where KUK identifies a greater potential risk;
- **Own Operations:** considering modern slavery risks associated with relevant contractors, service providers and labour arrangements supporting KUK's own operations;
- **Training:** providing appropriate refresher training to relevant employees on modern slavery and human rights; and
- **Effectiveness:** considering appropriate measures which will allow KUK to monitor and report more clearly on the effectiveness of its modern slavery activities in future statements.

KUK will review progress in these areas as part of the preparation of its next annual Modern Slavery Statement.

9. Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Komatsu UK Limited's slavery and human trafficking statement for the financial year ended 31 March 2026.

It was approved by the Board of Directors of Komatsu UK Limited on 25 August 2026.



Stuart Reid
Managing Director
KOMATSU UK LIMITED

25th August 2026