



Komatsu UK Ltd

Slavery and Human Trafficking Statement for the Financial Year 2024

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (“the Act”), and sets out the steps undertaken by Komatsu UK Limited (“KUK”) during the previous financial year to ensure that slavery and human trafficking (“human rights abuse”) is not operating within its own business nor its supply chains, and the further steps which are to be taken going forward.

Organisation's Structure

KUK is part of the global Komatsu Group, whose head office is in Tokyo, Japan. KUK manufactures medium-sized hydraulic excavators, sold mainly to the European market. The company’s 2024 financial year runs from 1st April 2024 to 31st March 2025.

Our Supply Chains

KUK operates with a global supplier base, comprising around 75 companies, providing parts, services and equipment. The supply chains can be extensive and sometimes involve a number of levels between raw materials entering the manufacturing process, through to delivery of the finished component to KUK.

KUK management are committed to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in KUK’s supply chains. The Company has a commitment to engage only those suppliers that uphold these principles. In cases where it is apparent a supplier has failed to take steps to cease or prevent human rights abuse, KUK reserves the right to immediately terminate the business relationship.

Since 2016, KUK has continued to enhance its compliance activities under the Modern Slavery Act. Key initiatives include:

- **Annual Risk Assessments:** Based on PESTLE analysis, product type, and company ownership, our supply chain is reviewed annually to assess risk.
- **Site Visits and Supplier Audits:** A structured programme of regular audits and visits helps monitor supplier compliance. No issues have been identified to date.
- **Supplier Declarations:** All suppliers and on-site contractors have provided written confirmation of compliance with the Act. Where applicable, copies of their own Modern Slavery Statements have also been obtained.
- **Team Training:** All purchasing team members have completed e-learning training focused on modern slavery in procurement.
- **Company-Wide Awareness:** Komatsu Limited has provided internal training on modern slavery and human rights to all KUK employees, with additional modules for procurement staff to enhance awareness, improve risk identification, and strengthen preventative measures.

- **Supplier Handbook Updates:** The handbook provided to direct suppliers has been revised to reinforce KUK's expectations regarding modern slavery and human trafficking.

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 is the Company's *"Mindset, belief, values, and code of conduct in writing that the Komatsu group employees should follow"* and explains what is required from employees in order that the Company can achieve its corporate value. The KOMATSU Way requires compliance with the laws and rules of the business community, and to expand upon this, Komatsu has in place a Worldwide Code of Business Conduct (the Code). All employees must follow the Code, and undertaking training in the Code is mandatory. In relation to employment, the Code states that Komatsu Group companies shall not tolerate child labour or forced labour. Where any deviation to the Code is found to be in existence, a proper investigation is required, and remedial action must be taken.

There are contact persons in the organisation to whom whistle-blowers can report breaches of the Code, including information about possible human rights violations and infringements of labour standards. No instances of child labour or forced labour have been reported nor alleged in financial year 2024.

Further Steps

In the 2025 financial year, KUK remains committed to reinforcing its stance against modern slavery and enhancing supplier accountability. Key actions planned include:

- **Ongoing Risk Assessments:** KUK will continue conducting annual risk evaluations across its supply chain, with expanded scope to include any new suppliers and service providers.
- **Enhanced Transparency Measures:** We will persist in encouraging suppliers to improve transparency within their own supply chains. Regular site visits and targeted "open-eye" audits of Tier 1 suppliers will be maintained to ensure alignment with KUK's standards and legal obligations.
- **Refresher Training:** Relevant employees will receive updated training on modern slavery and human rights, reinforcing awareness and strengthening vigilance across all departments.

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 ending 31st March 2025.



Stuart Reid
Managing Director
KOMATSU UK LIMITED

27th August 2025