

Statement on the UK Modern Slavery Act 2024

1. Introduction

This statement is published by our company on behalf of the group conducting business and managing supply chains in the UK, pursuant to Section 54 of the Modern Slavery Act enacted in the UK on October 29, 2015. The purpose is to disclose our policies and the activities undertaken to prevent international human rights violations, including slavery and human trafficking, within our business and supply chains for the fiscal year 2024.

2. About Optex Group Co., Ltd.

Since the establishment of Optex Co., Ltd. in 1979, we have aimed to be a group of companies overflowing with entrepreneurial spirit. By transforming our actions and taking on the challenge of new business creation, we strive to build a society that is safe, secure, comfortable, and efficient. We possess technological strengths in various niche markets, including a 40% global market share in outdoor security sensors, 30% globally and 50% domestically in automatic door sensors, and a leading position in image-processing LED lighting. Our headquarters are located in Shiga Prefecture, Japan, where we actively contribute to the community through environmental education and supporting future athletes. We operate with approximately 2,100 employees across 41 subsidiaries, 1 affiliate and 95 domestic and overseas sites. Our consolidated revenue is approximately 56.3 billion Japanese yen, with significant sales overseas. In the UK, we conduct business through Optex (Europe) Limited, Farsight Security Services Ltd., Raytec Limited, and Gardasoft Vision Limited. For more detailed company and business information, please visit our website.

[Company information | OPTEX GROUP CO., LTD.](#)

3. Policies and Initiatives on Preventing Slavery and Human Trafficking

(1) Basic Policy

At our company, respecting the human rights of all individuals involved in our business activities is essential for sustaining our business and fulfilling our social responsibilities. We have strengthened our management system by transitioning to a holding company structure in 2017 and have periodically revised the "Optex Group Code of Conduct" since it was clearly established in 2003. On July 12, 2024, we also published the "Optex Group Human Rights Policy," practicing our commitment to human rights. This policy supports international norms such as the "UN Guiding Principles on Business and Human Rights" and the "International Bill of Human Rights," and applies to all employees and officers of the Optex Group and its subsidiaries. We also expect our suppliers and business partners to understand and support this policy, and we continuously

engage with them on this matter.

(2) Basic Approach

With the basic stance of "continuously enhancing corporate value while earning the trust of all stakeholders, including customers, business partners, shareholders, and the community," we have established a system for regularly reviewing related policies and regulations. Not only do we publish the "Optex Group Code of Conduct" and the "Optex Group Human Rights Policy" on our website, but we also disclose the Corporate Social Responsibility initiatives of each group company there. Policies and regulations are also provided in English, ensuring that they are accessible to our employees and officers, including those in our overseas subsidiaries, on a regular basis. Furthermore, we have established and properly operate an internal reporting system that allows for consultations on human rights violations, among other issues.

4. Processes for Preventing Slavery and Human Trafficking in the Supply Chain

(1) Supply Chain Policy

Our supply chain initiatives also focus on respecting basic human rights. We believe that the effective prevention of slavery and human trafficking can only be achieved through cooperation with our suppliers, and we emphasize sharing our philosophy with them.

(2) Supply Chain Approach

Our core business companies have established a "Responsible Minerals Policy" to prevent human rights abuses, environmental destruction, and the exacerbation of armed conflicts through supply chain surveys and collaboration with suppliers. Additionally, our main manufacturing companies not only set a "Parts Procurement Policy" but also promote improvement activities with partner factories through a program called "PROGRE3," visiting suppliers' manufacturing sites, and conducting improvement guidance and exchange meetings on a regular basis, under the belief that "manufacturing is people development."

5. Education

At the Optex Group Co., Ltd., the "Optex Group Code of Conduct" is available in both English and Japanese on the corporate website and intranet, ensuring that it is accessible at all times. It is also communicated internally through company notices.

6. Moving Forward

We aim to contribute to society through high-value-added business activities and ultimately gain broad societal support. We will continue to focus on complying with laws, fostering high ethical standards, fully recognizing the importance of human rights issues, and engaging with and gaining further understanding and cooperation from our supply chain partners as we conduct our business

Compliance with The UK Modern Slavery Act 2015

activities.

This statement was approved by the Group Compliance Promotion Committee, consisting of various companies within our group, on June 26, 2024, and by the Board of Directors of Optex Group Co., Ltd. on July 12, 2024.

July 12, 2024

Tatsuya Nakajima
President and CEO,
Optex Group Co., Ltd.