

Anti- Slavery and Human Trafficking Statement for FY2024

This document is a statement by Noritsu Koki Co., Ltd. disclosing its commitment to preventing forced labor and human trafficking in the Group's operations and supply chain in accordance with Section 54 of the UK Modern Slavery Act 2015.

1. About the Noritsu Koki Group

■ Structure and Business Overview

The Noritsu Koki Group (the "Group") has 13 consolidated companies and 1,239 employees (as of December 31, 2024), mainly in the parts/materials business and the audio equipment/peripherals, which both utilize globally advanced technologies. This statement is issued by Noritsu Koki Co., Ltd. (the "Company") on behalf of its consolidated company AlphaTheta EMEA Limited (European subsidiary of AlphaTheta Corporation, one of the core companies of the Group) which is a reporting entity under the UK Modern Slavery Act 2015 (the Act).

For more information about the business of our Group, please visit our website.

https://www.noritsu.co.jp/business_en/

■ Supply Chain

This statement describes the supply chain of products supplied by the Group. Products supplied by the Group are manufactured at plants operated by consolidated subsidiaries and at plants operated by contract manufacturers (EMS providers, ODMs). AlphaTheta EMEA Limited imports and sells DJ, music production and audio equipment to individual and corporate customers in Europe, including the UK. This equipment is made in contract manufacturing plants located primarily in China and Southeast Asia. The Group has established long-term collaborative relationships with these contract manufacturing plants, which are required to comply with the Noritsu Koki Group Procurement Policy.

■ Corporate Philosophy

In its corporate philosophy, the Company's mission is "Prosperity for society and people" and its vision is to be "A corporate group that continues producing 'No. 1/Only 1' businesses." The Company aims to realize this mission and vision by implementing its values – "Understand the needs of the age and think one step ahead," "Pursue products and services that enrich lives," and "Respect the potential for growth and innovation and support a spirit of challenge."

Corporate Philosophy:

https://www.noritsu.co.jp/about_en/

2. Policies Related to Preventing Slavery and Human Trafficking

■ Noritsu Koki Group Human Rights Policy

In July 2022, the Group disclosed the Noritsu Koki Group Human Rights Policy (revised in Nov 2023), which was approved by the Board of Directors. The policy is based on international human rights standards, including the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and its follow-up, the Guiding Principles on Business and Human Rights, and the Children's Rights and Business Principles. This Policy states that the Group will not tolerate any form of slavery and human trafficking and expects all of the Group board members, employees as well as its suppliers and other business partners to comply with the Policy. To fulfill its responsibility to respect human rights, the Group is committed to developing and continuously implementing a framework of human rights due diligence to avoid causing or fomenting negative human rights impacts in its value chain.

Noritsu Koki Group Human Rights Policy:

https://www.noritsu.co.jp/sustainability_en/other_policies_en/#section3

■ Noritsu Koki Group Code of Conduct

The Group has established the Noritsu Koki Group Code of Conduct to clarify its basic management approach and expected standards of conduct for corporate executives and employees. The Code of Conduct is based on the basic policy of compliance with all applicable laws and regulations in each country and region where the Group operates, and consists of the following six items: (1) Legal Compliance, (2) Social Contribution, (3) Working Environment, (4) Information Management, (5) Ethical Behavior, and (6) Delivering Safe and High-Quality Products and Services.

Noritsu Koki Group Code of Conduct:

https://www.noritsu.co.jp/company_en/conduct_en/

■ Noritsu Koki Group Procurement Policy

The Group has established the Noritsu Koki Group Procurement Policy, which clearly states its commitment to promoting sustainable procurement including consideration for human rights and the environment, as well as legal compliance. With the aim of further propelling its procurement activities based on the policy, the

Group established the Noritsu Koki Group Procurement Guidelines which stipulate specific standards and approaches of behavior the Group expects its business partners to comply with and apply to their business operations. In establishing these guidelines, the Group has referred to the Code of Conduct of Responsible Business Alliance (RBA) and the Responsible Business Conduct Guidelines of Japan Electronics and Information Technology Industries Association (JEITA). The guidelines consist of eight sections: Labor, Health and Safety, Environment, Ethics, Quality and Safety, Information Management, Business Continuity Plan, and Management System.

AlphaTheta EMEA Limited, a reporting entity under the Act has established an Anti-Slavery and Human Trafficking Policy which states that AlphaTheta EMEA Limited will not tolerate any form of slavery and human trafficking and expects all of its business partners who works for, or on behalf of, AlphaTheta EMEA Limited anywhere in the world to adhere to the same standards and report any concerns to AlphaTheta EMEA Limited.

Noritsu Koki Group Procurement Policy:

https://www.noritsu.co.jp/sustainability_en/other_policies_en/#section2

Noritsu Koki Group Procurement Guidelines:

https://www.noritsu.co.jp/wp/wp-content/themes/noritsukoki/sustainability/pdf/society_procurement_activities/en/guideline_2025.pdf

AlphaTheta EMEA Limited Anti-Slavery and Human Trafficking Policy:

<https://alphatheta.com/en/company/anti-slavery-and-human-trafficking-policy-alphatheta/>

3. Efforts to Prevent Slavery and Human Trafficking

■ Human Rights Due Diligence

Since 2023, the Company has conducted human rights due diligence at the Groupwide level to ensure efforts to respect human rights are effective, in line with the Noritsu Koki Group Human Rights Policy. Human rights due diligence is the responsibility of the Sustainability Promotion Office of Noritsu Koki, which implements initiatives in collaboration with the Personnel & General Affairs Department and the procurement departments of Group companies. In 2024, the Group conducted further investigation on the prioritized risks (risks with high severity and relevance to the Group's business) based on the human rights risk map and implemented necessary measures. The human rights risk map was created in 2023, as the first phase of human rights due diligence assessing human rights risks

related to the Group's businesses.

■ Risk Assessment and Monitoring

To respect human rights and eliminate slavery and human trafficking from the Group's entire supply chain, the Group believes the business partners must also share its values and policies on respect for human rights. In 2024, with the aim of further propelling its procurement activities based on the policy, the Group established the Noritsu Koki Group Procurement Guidelines which stipulate specific standards and approaches of behavior the Group expects its business partners to comply with and apply to their business operations, and developed a self-assessment questionnaire (hereinafter referred to as SAQ) based on the guidelines. The Group also conducted supply chain audits of contract manufacturers through its quality audit mechanism, which overlaps with some areas of the Group Procurement Policy and the Guidelines.

Going forward, the Group will identify human rights risks (including slavery and human trafficking) within the supply chains of the Group's businesses through the implementation and analysis of the SAQ, consider and implement measures to mitigate and avoid such risks.

■ Effectiveness of Actions

As noted above, the Group conducts risk assessments, raises awareness of policies among its business partners and carries out quality audits of contract manufacturers annually. By monitoring the number and results of audits, the Company verifies the effectiveness of measures to prevent human rights violations.

The Group's efforts to address sustainability issues, including human rights issues such as slavery and human trafficking, are reported annually to the Sustainability Promotion Committee and the Board of Directors.

■ Education and Training

In 2022, the Group formulated and published the Noritsu Koki Group Human Rights Policy (revised in Nov 2023) and conducted human rights training for all the Group's executives and employees to raise awareness of the policy and embed it across the organization. In 2024, the Group carried out human rights training for all corporate executives and employees to raise their awareness of the new policy. Human rights training will be conducted annually for all corporate executives and employees.

AlphaTheta EMEA Limited has also invested in educating staff to recognize the risks of modern slavery and human trafficking through mandatory training and staff are

encouraged to identify and report any potential breaches of the AlphaTheta EMEA Limited Anti-Slavery Policy.

■ Remediation

The Group operates an internal reporting system covering the entire Group to rapidly detect and prevent risks and issues in corporate activities. Each Group company also operates its own whistleblowing hotline that accepts reports on actions that violate, or could potentially violate, the Noritsu Koki Group Code of Conduct, including legal violations, human rights issues and corruption. While the Company and its Group companies accept reports through their websites from Group stakeholders, including workers in the supply chain, the Group recognizes that it needs to establish more effective mechanisms for remedying human rights issues and thus is working towards this.

4. Looking Forward

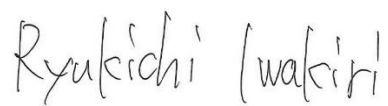
“Creating inclusive workplaces where diversity is respected and all employees can thrive and contribute with a future-oriented mindset” is one of the Group’s materiality issues. As a specific measure focused on respect for human rights, the Group is “respecting diversity and promoting more flexible ways of working.”

In 2025, the Group will continue efforts to raise human rights awareness across the organization and implement human rights training to cultivate an open corporate culture that respects diverse values and prevents human rights violations, including slavery and human trafficking. At the same time, the Group will inform and promote awareness of the Noritsu Koki Group Procurement Guidelines established in 2024 among its business partners, consider and implement measures to mitigate and avoid human rights risks within its supply chains including slavery and human trafficking identified through investigation using the guidelines based SAQ.

Noritsu Koki Group Materiality:

https://www.noritsu.co.jp/sustainability_en/materiality_en/#project

This statement was approved by a director delegated by the Company Board of Directors.

A handwritten signature in black ink, reading "Ryukichi Iwakiri". The signature is written in a cursive, slightly slanted style.

May 2025

Representative Director and CEO

Ryukichi Iwakiri