



## HANWA CO., LTD.

1-13-1 Tsukiji, Chuo-ku, Tokyo 104-8429, Japan

### Modern Slavery Statement

This statement is made pursuant to Section 54(1), Part 6 of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2025. This statement has been approved by board of directors.

#### **Our structure**

We are a global company which mainly specializes steel business as well as trading of various kinds of metals and alloys, food products, petroleum and chemicals, lumber, and machinery. We have subsidiaries and offices in several countries.

#### **Our policies in relation to slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our existing policies contain provisions aimed at ensuring that there is no slavery or human trafficking in any part of its global business or supply chain.

- [Hanwa Group Human Rights Policy](#)
- [Supply Chain Action Guidelines](#)

In addition to the above, in accordance with our corporate philosophy, we have established the "Corporate Ethical Standards" and the "Rules of Ethical Business Conduct" to ensure high corporate ethics through daily work. We have established the "Compliance Manual" for consistent penetration of corporate ethics and all the officers and employees shall observe the manual. It regulates that "Pay attention to human rights and eliminate wrongful discrimination, abuse and harassment, etc."

#### **Our approach**

- Human rights due diligence

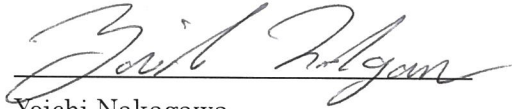
We support international human rights standards, including the International Bill of Human Rights, the International Labour Organization (ILO)'s Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights (UNGPs). We aim to build a human rights due diligence framework and continuously carry out human rights due diligence to identify, assess, and address adverse human rights impacts on stakeholders involved in our business activities. As a new initiative for this fiscal year, we conducted a Sustainability Activities Questionnaire targeting selected suppliers, with a focus on those with high procurement volumes. We confirmed that none of the responding companies were involved in forced labor or child labor. Going forward, we plan to gradually strengthen our human rights due diligence framework through enhancements to our assessment approach.

- Our training

We provided the new employees training and other trainings about modern slavery and human trafficking to ensure a high level of understanding of the risks of it in our supply chains and our business.

**Our whistleblowing system**

We have established compliance consultation desks in and out of the office. We encourage all the officers and employees to report in good faith any issues or concerns about potential violation of human rights, legal or regulatory requirements. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.



Yoichi Nakagawa

President

HANWA CO., LTD.

September 30, 2025