

NEC Modern Slavery and Human Trafficking Statement

This Modern Slavery and Human Trafficking Statement (this “Statement”) is made pursuant to section 54(1) of the UK Modern Slavery Act 2015, by NEC Corporation (“NEC”, or the “Company”) and its consolidated subsidiaries within the scope of the aforementioned Act, namely, NEC Europe Ltd., NEC (UK) Ltd., NEC Software Solutions UK Limited, Netcracker Technology EMEA Limited and ABeam Consulting Ltd. (together with NEC, the “Companies”).

This Statement outlines the initiatives made by the Companies in the year ended 31, March 2026 (“Fiscal 2026”¹), to prevent modern slavery and human trafficking from occurring in the Companies’ supply chains or business.

This Statement was approved by the Board of Directors of NEC on September 30, 2026.

a) The NEC Group’s structure, business and supply chain

NEC was founded in 1899 and is headquartered in Tokyo, Japan.

The NEC Group, consisting of the Company and its consolidated subsidiaries, has 101,800 employees (as of 31, March 2026), and annual turnover for Fiscal 2026 of 3,582.7 billion yen. For more information on the NEC Group's business, please see the corporate profile². The NEC Group promotes IT services, social infrastructure and other businesses based on its purpose "NEC creates the social values of safety, security, fairness and efficiency to promote a more sustainable world where everyone has the chance to reach their full potential."

The NEC Group procures components, electronic equipment, software, maintenance, and other solutions from suppliers around the world. The percentage of its consolidated procurement amounts were 67.9% for Japan, 12.3% for Asia, 9.5% for North America, 9.2% for EMEA (Europe, the Middle East and Africa) and 1.1% for Central and South America in Fiscal 2025.

b) The NEC Group’s policies in relation to slavery and human trafficking

The NEC Group has placed respect for human rights as one of the Principles of the NEC Way³ and also in the NEC Group Code of Conduct⁴, which clearly states that each and every officer and employee of the NEC Group needs to comply with these

¹ All other fiscal years are referred to in the same manner.

² <https://www.nec.com/en/global/about/profile.html>

³ <https://www.nec.com/en/global/sustainability/management/nec.html>

⁴ https://www.nec.com/en/global/about/pdf/necway/nec_code_of_conduct.pdf

principles. In addition, the NEC Group supports the International Bill of Human Rights, the International Labour Organization (ILO) Core Labour Standards, the UN Guiding Principles on Business and Human Rights (UNGPs), the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct, the Ten principles of the UN Global Compact⁵, and other internationally recognized national laws and regulations in the relevant region. The NEC Group Human Rights Policy⁶, which is applicable to all officers and employees of the NEC Group, including fixed-term contract employees, temporary employees, and part-time employees, states that where national laws in the relevant jurisdiction conflict with internationally recognized human rights, the Company will seek ways to respect the principles of internationally recognized human rights. The NEC Group also encourages its suppliers, business partners, and customers to understand this Policy and share its commitment to respecting human rights. Furthermore, suppliers are required to comply with the "NEC Group Procurement Policy"⁷ and "Guidelines for Responsible Business Conduct in Supply Chains"⁸

c) The NEC Group's due diligence process in relation to modern slavery and human trafficking in its business and supply chain

(1) Promotion framework

- The CEO oversees the initiatives based on the NEC Group Human Rights Policy.
- The Company discusses risks related to human rights on a regular basis at a Risk Control and Compliance Committee.
- The CFO, who is in charge of sustainability promotion at NEC, presents regular reports on the status of the initiatives for respecting human rights to the Board of Directors.
- The Board of Directors monitors the progress of the initiatives.
- Please see below for details of initiatives implemented by the Companies other than NEC,
 - NEC Europe Ltd. and NEC (UK) Ltd.
http://uk.nec.com/en_GB/emea/about/policy/modern_slavery_and_human_trafficking_statement.html

⁵ NEC became a signatory to the UN Global Compact in 2005.

⁶ https://www.nec.com/en/global/sustainability/pdf/human_rights_en.pdf

⁷ <https://www.nec.com/en/global/purchasing/renshiki-a2.html>

⁸ https://www.nec.com/en/global/purchasing/data/en2_sc_csr_guideline_4e.pdf

- NEC Software Solutions UK Limited
<https://www.necsws.com/modern-slavery-statement/>
- Netcracker Technology EMEA Limited
<https://www.netcracker.com/netcracker-modern-slavery-and-human-trafficking-statement>
- ABeam Consulting Ltd.
<https://www.abeam.com/content/dam/abeam/jp/en/about/sustainability/social/statement2026.pdf>

(2) Human rights due diligence process

- The Company conducts human rights due diligence (the “Human Rights DD”) according to the UNGPs, with a focus on those human rights issues that it has determined as salient. The Company sets activity targets and KPIs, manages progress, conducts transparent disclosure, and submits reports to the Board of Directors in a timely manner.
- The Company assesses impacts on human rights appropriately to heighten the effectiveness of the Human Rights DD. Further information on the history of the impact assessments can be found here.
<https://www.nec.com/en/global/sustainability/social/humanrights.html>
- From Fiscal 2022, NEC has identified the following human rights issues as salient. Each salient issue is assigned to a department responsible for the Human Rights DD.
 - AI and Human Rights
 - Human rights risks related to geopolitical situations and conflicts
 - Human rights in supply chains
 - Employee safety and health

d) The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk

- Business
 - (1) Promotion framework for employee safety and health

The Company examines modern slavery and human trafficking issues that may affect employees under the agenda of “Employee safety and health” which is one of the salient human rights issues. Since 1997, the Company has used the Human Rights Promotion Committee to share and discuss the status of human rights awareness activities for all employees and the implementation of various measures under the Inclusion & Diversity Policy,

with the aim of respecting human rights, including prohibiting discrimination and preventing harassment and overwork.

(2) Human Rights Impact Assessment for Employees

In order to strengthen management related to occupational health and safety (OH&S) and to confirm the actual status of efforts to respect human rights, the Company conducts periodic written surveys at our global sub-subsidiaries including Japan. In Fiscal 2026, the Company conducted written surveys of 48 domestic subsidiaries and 49 subsidiaries outside Japan. Survey items are developed with reference to JEITA's Responsible Business Conduct Guidelines and the Responsible Business Alliance (RBA) Code of Conduct. Based on the Fiscal 2026 survey responses, the Company has confirmed that there are no significant risks relating to child labour, freedom of association, collective bargaining rights, across all companies surveyed. In addition, in FY2026, the Company conducted a corporate-level assessment of employee-related impacts with the support of BSR and identified risks related to safety and health, such as excessive working hours and harassment. The Company will strengthen its monitoring of these identified risks.

- Supply chains

(1) Promotion framework for sustainable procurement

At NEC, the Chief Business process Transformation Officer (CBXO) is responsible for sustainable procurement across the entire NEC Group, and decisions are made by a committee chaired by the head of procurement in the Business Process Transformation Division.

For consolidated companies outside Japan, NEC works with procurement managers at regional headquarters in Central and South America, Europe, and ASEAN and major local subsidiaries directly controlled by NEC to conduct periodic operational reviews in line with their annual activity policies and plans, and to promote sustainable procurement in accordance with the culture and business practices of each country, as well as with the basic policies and guidelines mandated by NEC. The NEC Group has identified the following six priority risks for supply chain management: human rights and labour, occupational health and safety, environment, product quality and safety, information security, and fair trade and ethics. Measures conducted in Fiscal 2026, are described in (2) to (3) below.

(2) Signing of Declarations by Suppliers

The NEC Group ensures implementation and compliance with its policies by requiring suppliers to enter into master contracts and to submit declarations stating their commitment to the Guidelines for Responsible Business Conduct in Supply Chains (“declarations”).

In the Mid-term Management Plan 2025, the Company has included “supply chain sustainability” as one of the “materiality” which are priority management themes from an ESG perspective that the Company needs to adopt to reinforce non-financial (ESG/future financial) evaluation methodologies to underpin the sustainable growth of companies and society. The Company worked toward a target of having suppliers who have signed declarations account for 75% of our total procurement amount by the end of Fiscal 2026 as an indicator of “supply chain sustainability”. As of the end of Fiscal 2026, the Company has obtained declarations from approximately 14,000 suppliers in and out of Japan, covering 88% of our consolidated procurement value.

(3) Human Rights Impact Assessment and Remediation for Suppliers

• Document Check

The Company asks its suppliers to conduct self-assessments, “Sustainable Procurement Self-assessment,” to assess the status of supplier compliance with the Company’s requirements and initiatives. The assessment covers checks on human rights, OH&S, the environment, fair trade, and other, as well as details on the acceptance of foreign technical intern trainees and the handling of human rights issues by Tier 2 suppliers and further upstream. Measures conducted in Fiscal 2026, are as follows:

- The Company received responses from 645 out of the 734 Tier 1 suppliers contacted.
- Each supplier’s efforts were evaluated on a five-point scale (A, B, C, D, Z) for each inspection theme—human rights, OH&S, the environment, fair trade, and other—based on their “score rate” and “critical points” evaluation criteria. The Company has provided feedback sheets to all of the suppliers that responded, indicating their score for each inspection theme and comparison to the average score

for each procurement category, and shared the evaluation results with them.

- 7 suppliers received a Z rating, indicating the existence of potential risks. Among these suppliers, 7 suppliers were rated Z in the human rights inspection theme. Through supplier engagement, such as NEC's understanding of the conditions and providing corrective action guidance, the Company will support suppliers that received the Z rating, with the aim of completing the correction of identified issues during the first half of Fiscal 2027.
 - For suppliers identified with high-risk items for correction in the fiscal 2025 surveys, the Company provided corrective guidance and follow-up until correction was completed. Records are also kept of corrective plans and reports upon completion of corrective actions, which are used to improve our activities. No risks related to forced labour or child labour were identified in fiscal year 2025 either.
- Third-party audits and second-party audits conducted by NEC
The Company is taking the following steps in accordance with OECD Due Diligence Guidance for Responsible Business Conduct. In Fiscal 2026, no nonconformances related to forced labour or child labour were identified through the processes described below:
 - Step 1: Collect and evaluate information on each risk from the perspectives of the ICT sector, regions, and business characteristics, based on The ICT Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights, the International Trade Union Confederation (ITUC)'s 2020 ITUC GLOBAL RIGHTS INDEX, other external research reports, and internal analysis of the NEC Group's procurement structure.
 - Step 2: Identify high-priority business domains while referencing results of international NPO BSR's evaluations of human rights impact. The risks identified are human rights risks to workers in manufacturing processes at plants of suppliers outside Japan (including outsourced production), human rights risks to foreign technical intern trainees in manufacturing processes at plants of suppliers in Japan, risk of long working hours in software development, and OH&S risks during construction, maintenance,

and inspection.

- Step 3: Map suppliers related to the above risks, evaluate the nature and scope of potential impacts, and conduct third-party audits by an external auditing firm, as well as second-party audits conducted by NEC, for selected suppliers (34 companies from Fiscal 2022 through Fiscal 2026). Incidents of nonconformance identified in these audits are evaluated and ranked according to the four categories (1. Response not required, 2. Items for improvement, 3. Items for improvement; high priority, 4. Items for correction) from the viewpoints of Japanese law and global standards. The Company provides feedback to suppliers and requests corrective action. For suppliers identified with high-risk items for correction in the Fiscal 2025 audit, the Company provided corrective guidance and follow-up until correction was completed.

- Establishment of Grievance Mechanism and Remediation

To minimize and prevent adverse impacts on human rights arising from our business activities, and to strengthen our commitment to respecting human rights, the Company has established the NEC Compliance & Integrity Hotline as a remedial mechanism to respond promptly and sincerely to human rights violations and improve the situation. This hotline accepts reports not only from the NEC Group employees, but also from business partners, and reports can be made anonymously. The identity of whistleblowers who contact the hotline and the nature of their reports are guaranteed confidentiality by the personnel in charge. In addition, whistleblowers will never suffer retaliation for having made a report. In the unlikely event that such retaliation takes place and is confirmed, necessary corrective measures will be taken. The NEC Group will immediately and accurately investigate the facts and the causes of the incident and strive to take appropriate measures to resolve the matter.

In addition, the Company has participated in the Japan Center for Engagement and Remedy on Business and Human Rights (JaCER) at the investigation stage, a cross-industry initiative launched by the JEITA and the Business and Human Rights Lawyers Network (BHRL), an association of lawyers.

- e) **The effectiveness in ensuring that modern slavery and human trafficking is not taking place in the NEC Group's business or supply chains, measured against such**

performance indicators as it considers appropriate

The Company uses the following as important indicators to measure the effectiveness of our initiatives:

- Types of complaints and the number of submissions received through the NEC Compliance & Integrity Hotline
- Results of the “Sustainable Procurement Self-assessment” and actual conditions survey
- Third-party and second-party audits and the progress of correction

In Fiscal 2026, based on the above indicators, the Company evaluated effectiveness of its initiatives towards human rights risks as follows:

- NEC Compliance & Integrity Hotline did not receive any concerns or reports related to modern slavery or human trafficking from employees or suppliers.
- Through supplier engagement, such as NEC’s understanding of the conditions and providing corrective action guidance, the Company will support 7 suppliers that received the Z rating in human rights inspection theme in the Fiscal 2026 survey, with the aim of completing the correction of identified issues during the first half of Fiscal 2027.
- For suppliers identified with high-risk items for correction in the Fiscal 2025 surveys, the Company provided corrective guidance and follow-up until correction was completed.

f) The training about modern slavery and human trafficking available to NEC Group’s staff and its suppliers

The Company provides the following training to prevent modern slavery and human trafficking:

- For employees
 - E-learning “Business and Human rights training” is held annually, and the attendance is required for all the employees at the Company and some of its subsidiaries and affiliated companies.
 - Annual training on Sustainability Procurement is provided to procurement personnel of the Company and its consolidated subsidiaries.
 - NEC provided training on sustainable procurement to employees at its regional headquarters and major local subsidiaries outside Japan.
- For suppliers
 - NEC provides information about seminars on “business and human rights” hosted by international organizations, government bodies, and industry

associations on the supplier portal for NEC Group.

The Company is a member of BSR and working group on Human Rights DD and supply chain run by the United Nations Global Compact Network Japan. By actively participating in external discussions on the latest trends and examples from other companies, NEC improves and enhances initiatives on global human rights issues.

g) Looking ahead, NEC's plan

The Company will continue to:

- review of the risk-based self-assessment process related to working practices and occupational health and safety for NEC Group employees.
- strengthen measures to combat excessive work for employees of the Company and its consolidated subsidiaries in Japan.
- strengthen risk assessment and identification through risk-based document inspections and expanded audits of the suppliers of the Company and its principal consolidated subsidiaries, as well as to promote ongoing improvements and measures for upstream suppliers.
- make transparent disclosure of Human Rights DD processes and efforts.



Kunikazu Amemiya

Member of the Board,

Corporate Senior Executive Vice President and CFO (Representative Executive Officer)

NEC Corporation

30 September, 2026