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## Modern Slavery Statement

### 1. Introduction

Modern slavery is a crime and a gross violation of mental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another letter to like them personal or commercial gains.

JEOL USA, Inc. and its subsidiary JEOL CANADA, Inc. have a zero-tolerance approach to modern slavery, and we are fully committed to prevent slavery and human trafficking in our corporate activities. We are also committed to ensuring that there is transparency in our own business and our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c. 9) We all have a responsibility to be alert to the risks, however small, in our business and our wider supply chain.

At JEOL USA, Inc. and its subsidiary, JEOL CANADA, Inc. we are committed to acting ethically and with integrity in all of our business dealings and relationships, and to promote compliance with applicable laws and protect the dignity and rights of all people connected to our business. We strive to work ever more closely with our suppliers to ensure their workforce, and the workforce of their supply chains are treated with respect and dignity. At the heart of our mission lies a commitment to fostering inclusive workplaces and sourcing products responsibly.

This is JEOL USA, Inc. and its subsidiary, JEOL CANADA, Inc.'s first modern slavery statement pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c. 9), and it will be reviewed annually hereafter. We acknowledge that stamping out modern slavery and human trafficking risk is a process that will take time. Our reporting outlines the measures we have in place and the efforts we have commenced to assess and address risks of modern slavery and human trafficking in our business and supply chain.

### 2. Our organisational structure, business operations and supply chains

JEOL USA, Inc.'s corporate headquarters is located at 11 Dearborn Road, in Peabody, Massachusetts. JEOL USA, Inc. is a wholly owned subsidiary of JEOL, Ltd. of Akishima, Japan. JEOL USA, Inc. was incorporated in the United States in 1962. JEOL Ltd. itself has been in business since 1946.

The primary business of JEOL USA, Inc. is the sale and service of Electron Microscopes and Analytical Instruments.

JEOL USA, Inc. employs approximately 260 people of which about 180 are field service personnel the rest of our personnel are comprised of salespeople, technical experts, specialists, training engineers and support staff.

JEOL USA INC. is the sole distributor of JEOL Products and Service for North and South America. JEOL LTD. is located at 1-2 Musashino, Akishima, Tokyo, 196-8558 Japan. JEOL instruments and their attachments are manufactured in Japan at Akishima.

JEOL CANADA Inc.'s head office is located at 3275 1re Rue Local #\*, Saint-Hubert, QC J3Y 8Y6, Canada. JEOL CANADA INC. is a wholly owned subsidiary of JEOL USA Inc. and was incorporated in October 1993 in the province of Quebec.

The primary business of JEOL CANADA Inc. is the sale and service of Electron Microscopes and Analytical Instruments.

JEOL CANADA INC. has 11 employees throughout Canada, consisting of 8 field service engineers, a Service Manager, and a Customer Care Representative.

To learn more about our business, please see [www.jeolusa.com](http://www.jeolusa.com).

### **3. Our supply chain risk profile**

- 3.1. Within our operations, we have assessed our risk profile based on sector and industry risks as low. All our workers are employed in United States and Canada where we have fair and responsible employment practices in place to protect and promote workers' rights.
- 3.2. That said, we recognise that risks of modern slavery may be present in our supply chain in areas such as the manufacture of parts incorporated in JEOL instruments. Since a majority of such workers are not employed directly by JEOL USA, Inc., we have less control and visibility over their working conditions and employment terms and we continue to tailor our risk management actions to address those risks. Namely, we continue our efforts to classify supplier risks and map key parts of our supply chain to identify and improve our understanding of modern slavery risks.

### **4. Actions taken to combat slavery risks**

- 4.1. Building on the policies and procedures we currently have in place, JEOL USA, Inc. is in the process of developing and implementing strategies to.
  - 4.1.1. Assess and better understand areas of potential risk in our business and supply chain.
  - 4.1.2. Monitor potential risk areas in our business and supply chain; and
  - 4.1.3. Reduce or mitigate the risk of slavery and human trafficking occurring in our business and
- 4.2. JEOL assesses and manages those risks by maintaining consistent and high standards of due diligence and risk mitigation processes to monitor for and avoid modern slavery in all environments in which JEOL operates in, including developing and implementing those policies, processes and actions discussed in sections 5 to 8 below.
- 4.3. Such processes and actions include, but are not limited to, the following, provides training to all employees to raise awareness of this issue within the organisation.

### **5. Our policies on modern slavery**

- 5.1. Our Social Governance Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to enforcing effective systems and controls to

prevent modern slavery from taking place in our business and supply chain. A copy of our Social Governance Statement can be found on our website at: [www.jeolusa.com](http://www.jeolusa.com).

- 5.2. JEOL USA, Inc. makes sure its suppliers are aware of its policies and adhere to the same high standards. Our Supplier Code of Conduct sets forth our expectations of all suppliers of goods and services to JEOL related to human rights and ethical business practices. A copy of our Supplier Code of Conduct can be found on our website at: [www.jeolusa.com](http://www.jeolusa.com).
- 5.3. JEOL's Code of Business Conduct ethics sets forth the expectations for all JEOL employees to act in an ethical and professional business manner.

## **6. Due diligence processes**

- 6.1. In order to identify and manage risks of modern slavery and human trafficking in our own business, we carry out background checks and periodically reassess our employment practices to ensure we meet or surpass employment standards in all jurisdictions in which we operate.
- 6.2. We are constantly in the process of reviewing and improving our approach to supplier due diligence with the aim of ensuring a more robust action plan to address modern slavery risks. As part of our initiative to identify modern slavery risks in our supply chain, we are currently in the process of completing a supplier risk-mapping assessment, starting with our key suppliers.
- 6.3. Certain key suppliers have been asked to complete a comprehensive supplier-due diligence questionnaire and lower-risk suppliers will be asked to do the same during the course of the next reporting period. As we receive responses from our suppliers, we reserve the right to undertake additional verifications and audits.

## **7. Supplier adherence to our values**

- 7.1. JEOL seeks to do business with suppliers that have similar values, ethics, and moral business practices, including those related to human rights. JEOL will not tolerate any form of modern slavery and human trafficking within its supply chain.
- 7.2. JEOL enforces a strict code of compliance and does not tolerate slavery and human trafficking within its supply chains.
- 7.3. We have a dedicated compliance team, which consists of involvement from the following departments:
  - 7.3.1. Legal
  - 7.3.2. Audit and compliance
  - 7.3.3. Human resources
  - 7.3.4. Procurement
  - 7.3.5. Sales
- 7.4. We will include anti-slavery provisions in our standard terms and conditions which are used with our suppliers and ensure that such provisions are included in all contracts as appropriate.

- 7.5. To ensure all suppliers and contractors in our supply chain comply with our values, we ask our suppliers to conform to our Supplier Code of Conduct and will not trade with any who do not demonstrate compliance.
- 7.6. We are currently investing in a training program to make sure our employees are aware and capable of recognizing and reporting the risks of modern slavery and human trafficking in our business and supply chain.
- 7.7. In order to further develop the above-mentioned policies, we plan to include information regarding modern slavery risks in our employee onboarding materials. We are also in the process of developing training for all employees on how to detect and report human trafficking and all forms of modern slavery risks.
- 7.8. Through our training programs, employees are encouraged to identify and report any potential breaches of JEOL's Supplier Code of Conduct. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

## **8. Remediation measures**

- 8.1. To date, we have not identified any instances of modern slavery or human trafficking in our business and supply chains, therefore, we have not been required to take remedial measures.

## **9. Remediation measures relating to loss of income to vulnerable persons**

- 9.1. We recognise that instances of modern slavery and human trafficking often impact the human rights of particularly vulnerable groups, such as migrant labourers, unskilled labourers, indigenous people, women, or children. To date, we have not discovered instances of modern slavery in our business and supply chain, therefore, we have not been required to take measures to remediate the would-be loss of income to vulnerable families.

## **10. Effectiveness in combatting modern slavery risks**

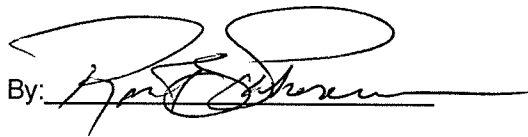
- 10.1. To date, has not taken any actions to assess the effectiveness of our actions in preventing and reducing risks of modern slavery in our activities and supply chain. Going forward, we will assess the effectiveness of our actions by evaluating KPIs, namely the number of staff trained, the number of suppliers and contractors screened, the number of reported breaches, and the instances of remedial actions being taken.

## **11. Approval of the Statement**

- 11.1. This statement is made in accordance with Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act and constitutes JEOL USA, Inc. and JEOL Canada, Inc. joint modern slavery statement for the year commencing on May 31, 2024 and ending on May 30, 2025.
- 11.2. This statement was approved by the Board of Directors of JEOL USA, Inc. pursuant to Paragraph 11(4)(b)(ii) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act on May 28, 2024.

11.3. In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signed

By: 

Robert Pohorenec

President

Date: May 27, 2025

I have the authority to bind both JEOL USA, Inc. and JEOL Canada, Inc.