

## **UK Modern Slavery Act Statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by Saison Technology Co., Ltd. (the “Company”) to identify and prevent risks of modern slavery and human trafficking in its business and supply chains. This statement covers the period from 1 April 2025 to 31 March 2026.

This is the Company’s first such disclosure. As an IT company with global ambitions, we recognise our responsibility to ensure that human rights are respected and that modern slavery and human trafficking is not taking place in our business operations and supply chains. The Company takes this important issue seriously and is committed to building a stronger management system through continuous improvement.

### **1. About the Organisation**

#### Company Profile

Company name: Saison Technology Co., Ltd.

Headquarters: 1-8-1 Akasaka, Minato-ku, Tokyo, Japan

Employees: 696 (as of 31 March 2026)

Businesses: HULFT Business, Data Platform Business, Systems Integration Business

The Company provides enterprise data integration services and supports system design, development and maintenance for a wide range of customers including financial institutions, manufacturers, telecommunications carriers and public institutions.

### **2. Supply Chain Overview**

The Company’s supply chain is primarily related to software development and systems integration, with limited procurement of physical products compared to manufacturing industries.

#### Major Procurement Categories

- Technical Services (outsourced development, system operation and maintenance)
- IT Hardware & Equipment (Servers, PCs, peripherals, etc.)
- Software Licences (Development Tools, Database, etc.), Cloud Services

#### Main Regions of Suppliers

- Japan (primarily outsourced development partners and hardware vendors)
- North America & Europe (Software Vendors, Cloud Service Providers)
- Asia-Pacific region (outsourced development partners)

### 3. Policy on Prevention of Modern Slavery

The Company does not tolerate any form of modern slavery, forced labour or human trafficking. We respect the dignity and rights of all people and strive to ensure that these practices are not taking place in our business operations and supply chains.

The Company upholds international norms regarding human rights, complies with relevant laws and regulations, and aims to conduct its business in line with these norms.

#### Relevant Policies

- Human Rights Policy: Sets out our commitment not to engage in any acts that harm the working environment, including discrimination, human rights violations and harassment, and to fulfil our responsibility to respect human rights
- Sustainable Procurement Policy: Sets out our commitment to establish trusted cooperative relationships with suppliers and to work together towards procurement with full consideration of social, environmental and economic aspects, including respect for human rights

### 4. Initiatives Conducted in FY 2025

#### (1) Risk Assessment

In FY 2025, the Company conducted its first human rights due diligence. Through questionnaires and interviews with our employees and suppliers, based on the 26 categories of human rights risks set out in the report published by the Human Rights Bureau of the Japanese Ministry of Justice (“Business and Human Rights”), we identified the following risk areas.

#### Identified Risks

- Harassment/Discrimination
- Excessive working hours
- Occupational health and safety

With regard to risks directly related to modern slavery, such as forced labour and child labour, although the severity of such incidents is high, the likelihood of occurrence has been assessed as relatively low. On the other hand, we recognise that attention should be paid to risks related to harassment/discrimination, excessive working hours and occupational health and safety. Risk assessments are conducted every February, and information is updated accordingly.

## (2) Supply Chain Management

#### Considerations in Supplier Selection

- Communicated the Company's Sustainable Procurement Policy to major suppliers (82 companies) and obtained their agreement to it
- Conducted screening for links to organised crime groups and credit checks when selecting new suppliers to verify compliance with generally accepted standards of corporate conduct

#### Periodic assessment of suppliers

- Conducted questionnaire surveys for suppliers in accordance with the 26 categories of human rights risks (including forced labour and child labour) set out in the report published by the Human Rights Bureau of the Japanese Ministry of Justice ("Business and Human Rights")
- Exchanged information on working conditions and human rights at meetings with major development outsourcing partners

#### Corrective Measures for Supplier Non-compliance

- Where supplier non-compliance is discovered, the Company demands correction based on contractual termination provisions and, after correction has been made, requires the supplier to submit a report on the corrective actions taken and provide representations and warranties regarding prevention of recurrence. If the supplier fails to correct the non-compliance within a reasonable period, the Company will take measures including contract termination.

### (3) Governance and Internal Controls

- Governance Structure
- Overall oversight: Atsushi Yoshihara, Director and Executive Officer, General Manager of Corporate Management Division
- Operational management: Corporate Management Division
- Monitoring: Business Process Management Department

Established Processes:

We operate the following processes:

- New Supplier Assessment Process: Conduct screening for links to organised crime groups and credit checks to verify compliance with generally accepted standards of corporate conduct
- Monitoring Process: Communicate the Company's Sustainable Procurement Policy to major suppliers, obtain their agreement to it, and verify their compliance with generally accepted standards of corporate conduct

Internal Audit: Internal Audit Office

The promotion of the above practices and the monitoring process are reviewed by the Internal Audit Office on a regular basis during operational audits.

### (4) Training

The following internal training sessions were conducted in FY 2025.

- E-learning for all employees: 672 employees (96%) completed the course.  
The main topics covered the relationship between business and human rights, and the intersection of AI technology and human rights issues.

### (5) Reporting and Consultation Channels

The Company has established both an internal reporting channel and an external reporting channel operated by an independent third-party organisation. Reports can be made by telephone, email or web form.

The reporting system is designed to enable the reporting of concerns about human rights violations, including modern slavery, forced labour and human trafficking. It ensures protection of the reporter's anonymity, prohibition of retaliation, strict confidentiality obligations and an appropriate investigation process. In FY 2025, there were no reports directly related to modern slavery.

## **5. Key Performance Indicators on Human Rights Risks**

The Company has set the following key performance indicators and will continue its efforts to reduce human rights risks.

- Training completion rate for all employees: 95% or above
- Sustainable Procurement Policy agreement rate among major suppliers: 100%
- Number of modern slavery-related reports: 0

## **6. Plan for Future Initiatives**

The Company will continuously improve its efforts to address the risks of modern slavery and human trafficking.

### **(1) Short-term Initiatives (FY 2026)**

- Regular implementation of human rights training for all employees
- Integrating human rights education into new employee training
- Improving visibility of working conditions through questionnaire surveys for suppliers

### **(2) Medium- to long-term direction**

- Establish a framework for setting KPIs and measuring effectiveness (response rate to supplier questionnaires, etc.)
- Operate the supplier assessment and selection process
- Provide suppliers with information on the Company's initiatives
- Strengthen dialogue with stakeholders
- Conduct annual human rights due diligence

This statement has been approved by the Board of Directors of Saison Technology Co., Ltd. and is signed by Makoto Hayama, Representative Director, pursuant to section 54(6)(a) of the Modern Slavery Act 2015. The Company will continue to review this statement regularly and report on the progress of its initiatives.

Saison Technology Co., Ltd.  
Representative Director  
Makoto Hayama

Date of Approval: 15 September 2026