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## 1 Organisation

This statement is made by Kanadevia Inova (“KVI”)<sup>1</sup> in accordance with Section 54(1) of the UK Modern Slavery Act 2015 and relates to activities during the financial year 1 April 2023 to 31 March 2024.

This statement sets out the steps KVI takes to ensure that there is no slavery or human trafficking in its own business and its supply chains.

Kanadevia Inova AG, as the parent of several companies incorporated in the UK, meets the threshold required under the UK Modern Slavery Act. However, its subsidiaries follow the same principles and procedures described in this statement.

Kanadevia Inova AG is wholly-owned by Kanadevia Corporation, a Japanese publicly-traded company.

As of 31 March 2024, KVI operated in the following regions, either directly or through subsidiaries it controls:

- Europe
- North America
- Middle East
- Australia

KVI has a global supply chain, with most suppliers located in Europe, Asia and in project locations in the regions in which it operates.

## 2 Modern Slavery

KVI considers that modern slavery includes:

- slavery, servitude and forced or compulsory labour
- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement

## 3 Commitment

### 3.1 Commitment within the KVI Group

KVI acknowledges its responsibilities in relation to combating modern slavery and commits to complying with international and domestic legislation in this regard. KVI understands that this requires an ongoing review of both its internal practices in relation to its labour force and, its supply chains.

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<sup>1</sup> During the financial year 2023-2024, Kanadevia Inova operated under the name Hitachi Zosen Inova. The companies in the Hitachi Zosen Inova group changed their names to Kanadevia Inova as of 1 October 2024.

KVI does not knowingly enter into business with any organization that supports or is found to involve itself in modern slavery.

No labour provided to KVI in the pursuance of the provision of its own services is knowingly obtained by means of modern slavery. KVI adheres to the standards required in relation to its responsibilities under relevant employment legislation in the countries of operation.

### **3.2 Commitment at Kanadevia Corporation**

KVI's parent company, Kanadevia Corporation, is also committed to respecting human rights including the elimination of forced labour and child labour. The most recent Kanadevia Corporation commitment in this regard was passed with effect from 1 April 2024, and is attached as Annex A to this statement.

## **4 Supply Chains**

The main supply chains of KVI include those related to engineering & design, manufacturing, procurement, erection, operation and maintenance, laboratory services, spare parts management, retrofit and service from various suppliers in the regions where KVI operates. KVI first-tier suppliers may have further contractual relationships with lower-tier suppliers.

KVI takes a robust approach against modern slavery and human trafficking.

KVI considers its main exposure to the risk of modern slavery and human trafficking to exist in the labour supply of construction and manufacturing both within first tier and lower tier suppliers.

In general, KVI considers its exposure to modern slavery and human trafficking to be limited, as KVI assesses such suppliers via transparent competitive tender processes and thereafter monitors such suppliers.

## **5 Steps**

KVI has not, to the best of its knowledge, conducted any business with another organisation that has been found to have involved itself with modern slavery.

KVI takes the following steps to ensure that modern slavery is not taking place:

- Require all suppliers to commit to the KVI Supplier Code of Conduct. Suppliers are specifically required to respect best practice and the provisions of the UN Universal Declaration of Human Rights & the Conventions of the International Labour Organization regarding elimination of child labour and non-use of forced labour and eradication of slavery and human trafficking
- Ensure its supplier contracts include termination powers in the event that the supplier is, or is suspected of being, involved in modern slavery
- Put qualification measures in place to identify and assess the potential risks in its supply chains
- Set up alert procedures: the employees of KVI are expected to report violations of the Code of Conduct or the Supplier Code of Conduct (both of which include prohibitions against modern slavery) to their managers or to the Compliance Officer, as appropriate.

- Employees and third parties use KVI's independent Alert Hotline – if desired, anonymously – to notify any concerns, either about themselves or others  
[KVI Whistleblower Alert Hotline](#)
- Raise awareness by the publication of posters at construction sites, awareness within HR teams and Site Manager training. These include additional hotline numbers and reporting mechanisms

## 6 Policies and Further Applicable Documents

KVI has the following policies which further define its stance on modern slavery.

- KVI Code of Conduct:
  - In English: [KVI Code-of-conduct\\_EN](#)
  - In German: [KVI Code-of-conduct\\_DE](#)
  - In French: [KVI Code-de-conduite\\_FR](#)
- Supplier Code of Conduct: [KVI Supplier Code of Conduct](#)
- Recruitment Procedures

## 7 Compliance

KVI Legal and Compliance functions together with all the managers and employees of all disciplines of KVI are engaged in combating modern slavery.

KVI Compliance can be contacted at:

[compliance@hz-inova.com](mailto:compliance@hz-inova.com)

Zurich, Switzerland

Tadashi Iwanaga  
Chairman

Bruce Gailey  
Legal Director Corporate and Compliance

**Annex A****Hitachi Zosen Corporation<sup>2</sup> Human Rights Policy  
Effective 1 April 2024**

Our company and our subsidiaries (collectively, our "Group"), recognize the importance of respect for human rights among people affected by global business activities, and in order to further promote efforts to respect human rights and fulfill its responsibilities, our Group hereby establish the Human Rights Policy (hereinafter, the "Policy") based on the concept of "Respect for Human Dignity " as stipulated in our Group Charter of Ethical Behavior. Our Group respect the "International Bill of Human Rights" and the "Declaration on Fundamental Principles and Rights at Work" of the International Labor Organization (ILO) and promote efforts to respect human rights. As a company that signs the United Nations Global Compact, our Group respect the ten principles of the United Nations Global Compact.

**1. Scope**

This Policy applies to the officers and employees of our Group. The term "officers and employees" shall mean directors, corporate auditors, and other executives and employees (including contract employees and temporary employees) of our Group. Our Group will also encourage all stakeholders, including our supply chain, to understand this Policy and endeavor to respect human rights.

**2. Respect for human rights**

Our Group will comply with the laws and regulations of the countries or regions in which we operate. In the event of a conflict between internationally recognized human rights and the laws of each country or region, we will pursue a course of action which fully respect the internationally recognized human rights. Our Group also recognizes that the following human rights initiatives are an important element of respect for human rights.

- **Discrimination and harassment**
  - We will respect the diversity of individuals and will not engage in any discrimination or harassment, nor will we accept such discrimination.
- **Freedom of Association and the Right to Collective Bargaining**
  - We will respect the freedom of association and the right to collective bargaining.
- **Forced labor and child labor**
  - We will not engage nor accept any forced labor or child labor.
- **Working hours, wages, and occupational health and safety**
  - We will comply with the laws and regulations applicable to working hours and wages.
  - We shall strive to the create a safe and a healthy working environment.

**3. Human Rights Due Diligence**

Our Group will conduct human rights due diligence to identify, prevent and mitigate negative human rights impacts. In order to effectively address the negative impact on human rights, our Group will continuously examine the methods and effects of implementing human rights due diligence.

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<sup>2</sup> At the time of publication, the name of our parent company was Hitachi Zosen Corporation. The company changed its name to Kanadevia Corporation on 1 October 2024.

4. Remedies

If it becomes clear that our Group has caused or has been involved in a negative human rights impact, our Group will promptly rectify and remedy it through appropriate procedures. Our Group will also strive to establish and operate an effective complaint handling system.

5. Education

Our Group will continue to educate and enlighten officers and employees on respect for human rights so that this Policy can be implemented.

6. Dialogue

Our Group will engage in sincere dialogue and discussions with relevant stakeholders regarding actual and potential negative impacts on human rights.

7. Disclosure

Our Group will disclose the progress and results of our efforts to respect human rights on our website and other media .