

# Modern Slavery Report

For the financial year ended March 31, 2024

## 1 Introduction

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

JEOL USA, Inc. and its subsidiary JEOL CANADA, Inc. (together, "JEOL") have a zero-tolerance approach to modern slavery and are fully committed to preventing 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* (the "Act"). We all have a responsibility to be alert to the risks, however small, in our business and our wider supply chain.

This is JEOL's first modern slavery report pursuant to the Act, made for its financial year ended March 31, 2024.

## 2 Structure, Activities and Supply Chains

JEOL USA, Inc.'s corporate headquarters is located 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 USA, Inc. employs approximately 260 people of which about 180 are field service personnel. The rest of our personnel is comprised of salespeople, technical experts, specialists, training engineers and support staff.

JEOL CANADA, Inc.'s head office is located in Saint-Hubert, Canada. JEOL CANADA, INC. is a wholly owned subsidiary of JEOL USA Inc. and was incorporated in October 1993 in the province of Quebec. JEOL CANADA, Inc. has 10 employees throughout Canada, consisting of eight field service engineers, a Service Manager and a Customer Care Representative.

The primary business of JEOL USA, Inc. and JEOL CANADA Inc. is the sale and service of Electron Microscopes and Analytical Instruments procured from JEOL Ltd. JEOL USA, Inc. is the sole distributor of JEOL Products and Service for North and South America. JEOL instruments and their attachments are manufactured in Japan in the city of Akishima.

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

## 3 Risk Assessment

Within our operations, we have assessed our risk profile based on sector and industry risks as low. All of our workers are employed in the United States and Canada, and we have fair and responsible employment practices in place to protect and promote workers' rights.

That said, we recognise that risks of modern slavery may be present further down our supply chain in the procurement of raw materials used for the manufacture of JEOL instruments. Since such workers are not employed directly by JEOL, we have less control and visibility over their working conditions and employment terms.

JEOL assesses and manages these risks by maintaining consistent and high standards of due diligence to monitor for and avoid modern slavery in all environments in which JEOL operates in, including developing and implementing the policies, processes and actions discussed below.

## **4 Policies**

Our Social Governance Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to prohibiting forced, bonded, trafficked and child labour from taking place in our business and supply chain. A copy of our Social Governance Statement can be found on our website at: <https://www.jeolusa.com/ABOUT-US/Social-Governance>.

JEOL 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.

JEOL's Code of Business Conduct sets forth the expectations for all JEOL employees to act in an ethical and professional business manner and reaffirms our zero-tolerance policy towards any kind of modern slavery, including forced labour and child labour.

## **5 Due Diligence**

As part of its due diligence in ensuring its operations and supply chain are free of forced labour and child labour, JEOL includes, in its General Terms and Conditions of Purchase, a requirement for the supplier to comply with rules related to forced labour and child labour.

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.

## **6 Training**

JEOL offers an internal Ethical Business Practices course that touches on forced labour and child labour. We track attendance and ensure that all our employees successfully complete the course.

## **7 Remediation**

JEOL recognizes that any forced labour or child labour found in an organization's business or supply chain should be addressed on a first-priority basis. We have not discovered any instances of forced labour or child labour in our business or supply chain. Therefore, no remediation measures have been necessary and no such measures could have led to loss of income to vulnerable families.


## **8 Assessing Effectiveness**

We do not currently assess the effectiveness of our actions in preventing and reducing risks of modern slavery in our operations and supply chain. As we explore and implement further measures to prevent and mitigate modern slavery risks in our operations and supply chains, we will monitor and review performance to assess the effectiveness of any actions taken.

## **9 Approval**

This report was approved by the Board of Directors of JEOL USA, Inc. pursuant to subparagraph 11(4)(b)(ii) of the Act on May 28, 2024.

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.

By:   
Robert Pohorenc  
President, Director  
Date: May 28, 2024

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