

## **KODAK ALARIS MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **Financial Year Ended 31 March 2021**

#### **Introduction**

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 (MSA) and outlines the steps Kodak Alaris has taken to 31 March 2021 and plans to implement to prevent Modern Slavery and human trafficking within the Group and ensure it does not take place in our business or supply chains. Modern Slavery and human trafficking are crimes and a violation of fundamental human rights and consequently have no place in Kodak Alaris.

We want our customers and stakeholders to be confident that we treat our employees fairly, with respect for human rights and are not exposed to unsafe working conditions or in any way forced to work under slavery. We believe that when ethical standards are in place this can improve worker well-being, productivity and quality of output. We do this through a series of measures and policies covering whistleblowing, Anti-Bribery and Corruption and ensuring all employees have remuneration and benefits that meet national legislative requirements.

Overall, we believe that our risk to Modern Slavery and human trafficking is low.

Previously published Modern Slavery and Human Trafficking Statements can be found via the following link: <https://legal.kodakalaris.com/en-us/corporate-policies>.

Please feel free to contact us at [legal@kodakalaris.com](mailto:legal@kodakalaris.com) with any comments, queries or suggestions regarding our statement. We welcome a dialogue with all customers and stakeholders who are interested in this subject.

Kodak Alaris has its corporate headquarters in the UK with sales operations globally and one manufacturing facility in Colorado, US. For the purpose of this statement, any reference to Kodak Alaris includes the operating businesses and the group subsidiaries through which they trade.

#### **Structural Organisation**

Kodak Alaris was established in 2013 when the UK Kodak Pension Plan formed Kodak Alaris from three businesses acquired from Eastman Kodak Company. These businesses are:

- Kodak Moments
- PPDS – (formerly Paper Photochemical & Film (PPF))
- Alaris

In 2016, management launched a new business, called AI Foundry, to assist organisations with the streamlining and automation of manual back office processes.

During 2020 several key events occurred that resulted in the following:

- The ownership of the Kodak Alaris Group transferred from the UK Kodak Pension Plan to the UK Pension Protection Fund
- The PPDS business was sold to the Sino Promise Group with the Film product line being retained and transferred internally to the Kodak Moments business unit
- The AI Foundry business was sold to Gateless Group

- The new shareholder, the UK Pension Protection Fund, instructed the Board and management team of Kodak Alaris to cease marketing the divestiture of the Alaris and Kodak Moments' businesses in the process committing to a "retain, run and grow" strategy for the retained businesses.

### COVID-19

During 2020/21, like many other businesses Kodak Alaris was not immune from the consequences of COVID-19. The pandemic created and continues to create a level of uncertainty and has had a significant impact on revenue and EBITDA. Due to the scale of the impact this resulted in material reductions in headcount, employee furlough, planned investments being stopped or postponed and visits to customers and suppliers being prevented. Unsurprisingly like many companies our proposed initiatives in the field of modern slavery were curtailed or repositioned throughout the year, however key successes can still be reported. These are detailed below.

### Risks and Opportunities

As in prior years in this statement we identify our supply chains and employment relationships as the key risk areas for Modern Slavery. Below are some of the risks that the company has addressed over the past year:

- We have continued to mature our approach for tackling Modern Slavery at all levels within our supply chains within Kodak Alaris;
- We have updated the Group Board and Kodak Alaris Executive Committee on Modern Slavery so that directors and key management understand their role and accountability in eradicating Modern Slavery from our business and our supply chains;
- We have further revised and reissued certain selected standard terms of business globally for sales, purchasing and distribution and in the process reviewed and refreshed the language around obligations to prevent Modern Slavery;
- We continued to ensure that new key suppliers were not onboarded until they had received copies of and confirmed their acceptance of Kodak Alaris's Suppliers Code of Conduct which refers to the Modern Slavery and Human Trafficking Statement; and
- We provided training to employees globally to make them aware of their responsibilities in this area with over 80% of the workforce completing the training.

There are no known issues of Modern Slavery in our business or supply chains. No suspected incidents were reported in the year however if there were any these would have been duly recorded and investigated by the Group Compliance Officer. Kodak Alaris remains thoroughly committed to taking swift and robust action and notifying the authorities where appropriate should any evidence of Modern Slavery or human trafficking be identified.

### Policies

Kodak Alaris's governance programme is overseen by the Board whose responsibility is to ensure compliance and accountability across all operating companies. The CEO oversees the day to day management of Kodak Alaris's programme to tackle Modern Slavery and Human Trafficking.

Kodak Alaris's zero tolerance approach to Modern Slavery is outlined in our Group Modern Slavery Statement. This applies not just to our employees and contractors but to all persons working for us

or on our behalf in any capacity and requires our approach to be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and to be reinforced as appropriate thereafter.

Another relevant policy as mentioned above is our Supplier Code of Conduct. All suppliers are expected to acknowledge the Supplier Code of Conduct and maintain at least equal standards in their own organization. Our Supplier Code of Conduct is integrated into our procurement system, is incorporated into our contracting terms and is used in bid processes.

#### Our Supply Chain

Our supply chains operate across the globe and include a small number of countries, commodities and industries that we deem to be at higher risk for Modern Slavery issues.

We purchase a wide range of goods and services from IT hardware and software, to scanner and kiosk components, paper and film, to waste disposal products, finance and audit services. Some of these we use in our own business (Internal Supply Chain) and some we incorporate into products we sell to our customers (External Supply Chain).

Particularly through COVID-19 we have worked increasingly closer with our suppliers providing us with even greater insight into their operations and organisations and thus increasing opportunities for us to identify risks to Modern Slavery.

We have also ensured through this increasing engagement that we have supported suppliers with payments to protect orders in the short term and thus reduce the potential for Modern Slavery.

#### Internal Supply Chain

We regularly assessed our own internal controls and are confident that our processes are adequate to ensure we do not inadvertently employ anyone who is a victim of any of the forms of Modern Slavery.

#### External Supply Chains

During the year we started to focus on key tier 1 suppliers by asking them to engage with us so that we could check their understanding of the Modern Slavery Act, whether they fall within scope and what they are doing to mitigate the risk of Modern Slavery within their own organization and supply chain. Our efforts were curtailed significantly by COVID-19 as travel bans prevented visits to suppliers and protecting the health and welfare of employees and the future of the business became key.

Whilst some desk top evaluation of risks to Modern Slavery was still possible, longer term we plan to double our efforts by taking a risk-based approach that focuses on high risk countries or jurisdictions. Reflective of continued remote working more detailed remote fact-finding due diligence is being designed and will be conducted on suppliers operating within such high-risk jurisdictions.

The responses to these questionnaires will continue to be assessed by the Purchasing Group in conjunction with the Legal team as part of the supplier onboarding process before any contractual negotiations are finalised. If there are any issues highlighted, the responsible buyer will continue with the assessment until satisfied the supplier understands their responsibilities and the importance of this work. If necessary, we will consider further steps, including visits where possible

or failing this, remote working sessions run by our Purchasing Group for additional assessment and training.

As we gain a greater understanding based on responses from key tier 1 suppliers and suppliers in high-risk jurisdictions we will continue to review and refine the steps we take to identify and mitigate the risk of Modern Slavery in our supply chains.

Whilst the focus is on tier 1 suppliers and suppliers in high-risk jurisdictions, we also plan to issue a short form simplified assessment process for small suppliers that are non-production and considered to be operating in a low risk industry or country. This is aimed to reduce the administrative burden on small suppliers whilst demonstrating the requirement for governance.

Where possible the Company will build long-standing relationships with its suppliers and customers to make clear its expectations of behaviour.

Naturally having divested of the AI Foundry and PPDS businesses during the past year, the number of suppliers Kodak Alaris now deals with is significantly less. The PPDS business had a global footprint and global supply chain.

#### Modern Slavery – Employees and Contractors

As at 1 April 2021 Kodak Alaris employed 1,559 employees and 60 contractors across the World.

Kodak Alaris expects all staff to be treated with dignity and respect. Our objective is to provide a working environment in which all employees can realise their potential, free from harassment and discrimination. Kodak Alaris is committed to ensuring the health and safety of its staff and has robust policies in place to support this. We have developed a very open management style and culture that encourages the reporting of concerns to senior management as soon as they are raised and management are expected to act on them immediately.

Kodak Alaris has a unionised workforce in several countries represented by several different trade unions and works councils. These also seek to protect staff interests and Kodak Alaris consults with them regularly on several issues including Modern Slavery.

Several resources are available within Kodak Alaris for employees to acquire advice or to report grievances or any alleged or actual wrongdoing whether these relate to Modern Slavery or other matters. There are whistleblowing channels provided by Navex available through the World where staff can raise concerns on a confidential basis in local language.

Given its continuing importance, Modern Slavery is incorporated into compliance training delivered as a focussed e-learning module to all employees in 2021.

Through 2021 we will also continue to raise awareness of Modern Slavery by supporting the training through internal Corporate Communications emails, Town Halls and campaigns.

With respect to contractors where permissible we require them to undertake training provided by Kodak Alaris and they are always recruited through accredited reputable agencies.

#### Modern Slavery – Employee Recruitment

Zero hours contracts of employment are often considered a source of Modern Slavery as they are seen as preventing employees from taking other more reliable work or regular time off.

Kodak Alaris believes zero hours contracts are a high-risk area that can facilitate Modern Slavery practices. Consequently, it does not employ anyone on zero hours contracts.

The lack of tolerance for Modern Slavery in the workplace is reinforced through the employee onboarding process. When a new employee joins Kodak Alaris they spend approximately half a day with a representative from HR familiarising themselves with the corporate policies which includes the Modern Slavery Policy. This education demonstrates that such behaviours will not be tolerated in the workplace, provides advice on reporting such incidents and confirms to perpetrators that they will be dealt with appropriately.

#### Next Steps

As part of our ongoing commitment to eliminating Modern Slavery and Human Trafficking, we understand and recognise that our own circumstances and those of our suppliers are constantly evolving and we will continue to review our processes to ensure they are fit for purpose. During 2021/22 and beyond we plan to:

- Continue to develop our approach for tackling any issues or examples of Modern Slavery at all levels within our supply chains across Kodak Alaris;
- Continue to update the Kodak Alaris Board and KAEC on Modern Slavery;
- Ensure that new and renewed supplier contracts are placed on the latest terms that include reference to the Supplier Code of Conduct and Modern Slavery Policy;
- Ensure that high risk suppliers are identified and that they complete an in-depth questionnaire to flush out issues of concern;
- Issue a short form simplified assessment process for small suppliers that are non-production and considered to be operating in a low risk industry or country;
- Deliver a focussed e-learning module to all employees on Modern Slavery as part of their Compliance training building on the work done with Purchasing to date;
- Undertake an awareness campaign with employees to highlight Modern Slavery through internal communications of the policy, Town Halls and campaigns; and
- Use the learnings from COVID-19 to remain close to key suppliers and ensure regular check-ins to understand the issues and challenges they face which may increase the risk of Modern Slavery.

The above statement was signed by the Chief Executive Officer of Kodak Alaris on 12 April 2021 as applying to the group's operating subsidiaries as well as to Kodak Alaris Holdings Limited.



Mark Alflatt

Chief Executive Officer