

KODAK ALARIS MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Welcome to Kodak Alaris' Second Slavery and Human Trafficking Statement published in July 2019. This statement is made pursuant to Section 54, Part 5 of the Modern Slavery Act 2015 (MSA) and outlines the steps Kodak Alaris has taken to 31 March 2019 to prevent Modern Slavery within the Group and ensure it does not take place in our business or supply chains.

Please feel free to contact us at 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.

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 (formerly Imaging - Consumer (I-C))
- PPF (formerly Imaging - Paper, Photochemicals & Film (I-PPF))
- Alaris (formerly Information Management (IM))

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

The above are the operating businesses within Kodak Alaris. Kodak Alaris has its corporate headquarters in the UK with operations globally. For the purpose of this statement, any reference to Kodak Alaris includes the operating businesses and the group subsidiaries through which they trade.

FY18 (1 January 2017 – 31 March 2018)

During 2017 we published our first Modern Slavery and Human Trafficking Statement that can be found via the following link: <https://legal.kodakalaris.com/en-us/corporate-policies>. In this statement we identified our supply chains and the employment relationship as the key risk areas for Modern Slavery. In order to address these risks during FY18 we:

- Continued to develop our approach for tackling Modern Slavery at all levels within our supply chains within Kodak Alaris;
- 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;
- Revised and reissued all standard terms of business globally for sales, purchasing and distribution to include new language to introduce and prevent Modern Slavery;
- Ensured new suppliers that were onboarded received copies of Kodak Alaris's Suppliers Code of Conduct which refers to the Modern Slavery and Human Trafficking Statement; and
- Undertook training with employees globally to make them aware of their responsibilities in this area with over 90% of the workforce completing the training.

There are no known issues of Modern Slavery in our business or supply chains. All suspected incidents that were reported in the year were 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 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 CFO 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).

Internal Supply Chain

We have 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

In FY19 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.

In FY20 we will continue our efforts in this area by taking a risk based approach that focuses on high risk countries or jurisdictions. Fact finding due diligence will be conducted on suppliers operating within such high-risk jurisdictions and we are sending out questionnaires to evaluate their compliance.

The responses to these questionnaires are assessed by the Purchasing Group in conjunction with the Legal team. 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 consider further steps, including visits 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 plan in FY20 to create 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.

Overall, we plan to issue 50 questionnaires during FY20. In order to achieve global coverage we plan to issue 10 per region (US and Canada; EMEA, LATAM and APAC) with a further 10 to be issued to tier 1 suppliers within high risk countries.

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

Modern Slavery – Employees and Contractors

At the end of FY19 Kodak Alaris employed 1,968 employees and 142 contractors across the World.

Kodak Alaris expects all staff to be treated with dignity and respect. Our aspiration 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.

Kodak Alaris has a unionised workforce in several countries represented by a number of different trade unions and works councils. These also seek to protect staff interests and Kodak Alaris consults with them regularly on a number of 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. This external service is available to all employees.

We realise that many of our staff who travel for business can also help combat Modern Slavery. During FY20, Modern Slavery will be incorporated into compliance training delivered as a focussed e-learning module to all employees. For those in Purchasing this will enhance the targeted Modern Slavery training previously rolled out given the work in that area was considered high risk.

In FY20 we will also continue our campaign of raising awareness of Modern Slavery by supporting the training through poster campaigns and internal communications of the policy.

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 FY20 and beyond we plan to:

- Continue to develop our approach for tackling 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 new terms that include reference to the Supplier Code of Conduct and Modern Slavery Policy;
- Carry out a detailed fact find on 50 Tier 1 suppliers across US & Canada, EMEA, LATAM and APAC with a focus on high-risk countries;
- Create 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; and
- Undertake an awareness campaign with employees to highlight Modern Slavery through poster campaigns and internal communications of the policy.

The above statement was approved by the Board of Kodak Alaris on 25 July 2019 as applying to the group's operating subsidiaries as well as to the Board of Directors of Kodak Alaris.



Mark Alflatt, Chief Financial Officer

Kodak Alaris Holdings Limited