



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Welcome to Kodak Alaris' Fourth Modern Slavery and Human Trafficking Statement.

This statement is made pursuant to Section 54, Part 5 of the Modern Slavery Act 2015 (MSA) and outlines the key modern slavery risks associated with Kodak Alaris' business and the actions implemented and further actions to be implemented aimed at eradicating modern slavery and human trafficking within its business and supply chains.

As a global organisation with a direct presence in 11 countries and indirectly selling into an additional 100+ countries we take a zero-tolerance approach to slavery and human trafficking to ensure our corporate activities and our supply chains are free of slavery and human trafficking.

This statement relates to the actions and activities during the financial year 1 April 2021 to 31 March 2022 (FY22) as well as planned activities.

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 stakeholders who are interested in this subject.

Our Business

Kodak Alaris is a UK headquartered group and 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 (KM))
- PPF (formerly Imaging - Paper, Photochemicals & Film (I-PPF))
- Alaris (formerly Information Management (Alaris))

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

The PPF and AI Foundry businesses, except the Film business of PPF, have since been divested and the business today comprises of KM and Alaris. KM provides Film and premium quality photo products to consumers. Alaris offers class-leading scanners, software and service to enable data capture. A full description of the business of Kodak Alaris can be found at www.kodakalaris.com. The business is today owned by the Pension Protection Fund.

Policies

Kodak Alaris's governance programme is overseen by the Board whose responsibility it is to ensure compliance and accountability across the group. 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 and Human Trafficking 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 is our Supplier Code of Conduct. All suppliers are required 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.

Approach

The approach to addressing the risks of Modern Slavery and Human Trafficking has matured over recent years as a result of several initiatives undertaken to tackle Modern Slavery and Human Trafficking. Some examples include:-

- Updating and communicating to suppliers Kodak Alaris's Suppliers Code of Conduct which refers to the Modern Slavery and Human Trafficking Statement thus setting clear expectations with suppliers on their obligations in this area;
- Revising and reissuing all standard terms of business globally for sales, purchasing and distribution to include new language to introduce and prevent Modern Slavery and Human Trafficking and providing Kodak Alaris the right to terminate contracts without notice in the event of any evidence of Modern Slavery and Human Trafficking together with rights of access to premises and diligence to investigate any concerns;
- Advising the Kodak Alaris Board and Kodak Alaris Executive Committee on Modern Slavery and Human Trafficking enabling the directors and key management to understand their role and accountability in eradicating Modern Slavery and Human Trafficking from our business and our supply chains; and
- Undertaking 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 current or historic known issues of Modern Slavery or Human Trafficking in our business or supply chains. Any incidents reported would be 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.

Areas of Continuing Focus

We would call out the following areas identified to be at risk from Modern Slavery and Human Trafficking and will focus our efforts to continue to address those risks in the coming year:-

- **Supplier/Procurement** – we will continue to require that suppliers to Kodak Alaris adhere to the highest ethical standards. The majority of Kodak Alaris's suppliers are long standing trusted partners that demonstrate the expected levels of behaviour. Nonetheless binding commitments to preventing Modern Slavery and Trafficking will remain incorporated into our vendor onboarding and contracting process and a robust process of due diligence and verification of vendors will continue to be undertaken prior to accepting any products or services. Where we identify potential or actual risks with a supplier spot checks and visits will be undertaken;
- **Employees/Contractors** – we will continue to demand that employees act in compliance with our Employee Code of Conduct which clearly stipulates the conduct expected of them when representing the organization. All employees are required to remind themselves of

the conduct guide on an annual basis and new joiners are also provided with a copy as part of their onboarding. All staff should be treated with dignity and respect, operate in a safe working environment and realize their potential free from harassment and discrimination. We will therefore continue to provide training to all employees globally to remind them of their duties, how to identify and report any concerns and how they will be investigated. We will also not employ any individual on a zero hours contract as we believe such contracts are unethical and increase the risk of Modern Slavery;

- **Whistleblowing** – We encourage all employees, customers, suppliers and other partners to report any concerns relating to the activities of the organization, or the supply chain of our organization. This includes any circumstances that may give rise to Modern Slavery and Trafficking. We will continue to have a whistleblowing procedure supported by a global reporting hotline enabling employees to report matters of concern confidentially and in their local language to the Group Compliance Officer whose duty it is to fully investigate the matter. This enables employees to report issues without fear of retaliation;
- **Recruitment of Contractor/Agency Workers** – When recruiting contractors/agency workers we will continue to use well known, reputable employment agencies many of whom are long standing partners. Any agencies used will continue to be fully vetted in accordance with our vendor onboarding and contracting process prior to engaging any workers. Agency and contractor headcount at 31 March 2022 represented 8% of the total workforce.

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 FY23 and beyond we plan to:

- Continue to develop and refine our approach for tackling Modern Slavery and Human Trafficking at all levels within our supply chains across Kodak Alaris;
- Continue to update the Kodak Alaris Board and Kodak Alaris Executive Committee on Modern Slavery and Human Trafficking;
- Investigate any reported issues as necessary in accordance with corporate policy;
- Deliver a focussed e-learning module to all employees on Modern Slavery and Trafficking reinforcing:-
 - how to assess the risk of Modern Slavery and Human Trafficking in relation to various aspects of the business, including resources and support available;
 - how to identify the signs of Modern Slavery and Human Trafficking;
 - what initial steps should be taken if Modern Slavery and Human Trafficking is suspected;
 - how to escalate potential Modern Slavery and Human Trafficking issues to the relevant parties in the organisation;
 - what external help is available, for example through Government/State Modern Slavery Helplines, Gangmasters, Labour Abuse Authorities etc.; and
 - what steps our organisation should take with any suppliers that do not implement Modern Slavery and Human Trafficking policies in high-risk scenarios, including removal from our supply chain.

The above statement was approved by the Board of Directors of Kodak Alaris Holdings Limited on 25 May 2022 and applies equally to all group operating subsidiaries.

Signature:

A handwritten signature in black ink, appearing to read "Diane Gardner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Diane Gardner, Chief Financial Officer

Kodak Alaris Holdings Limited