

# **ZEBRA Group Modern Slavery Statement**

## **1. INTRODUCTION**

ZEBRA HOLDINGS CO., LTD. (hereinafter referred to as the “ZEBRA Group”) hereby publishes its statement for the fiscal year ended March 31, 2025, pursuant to Section 54 of the UK Modern Slavery Act 2015. This statement outlines the measures undertaken by Zebra Group during the fiscal year ending March 31, 2025 to prevent the occurrence of slavery and human trafficking within its supply chains and business operations.

## **2. OUR BUSINESS AND ORGANISATION'S STRUCTURE AND OUR BUSINESS**

Founded in 1897, ZEBRA Group comprises nine subsidiaries. With more than 2,000 consolidated employees, we are engaged in the development, manufacture, and sale of a wide range of writing instruments, including ballpoint pens, mechanical pencils, and markers.

For further details regarding our business activities, please refer to our website below.

<https://www.zebra.co.jp/corp/>

In the United Kingdom, we conduct sales indirectly through its subsidiary, ZEBRA PEN (UK) LIMITED. (hereinafter referred to as the “ZEBRA PEN UK”)

For further information regarding the business activities of ZEBRA PEN (UK) LIMITED, please refer to the website below.

<https://zebrapen.co.uk/>

## **3. OUR SUPPLY CHAINS**

Our products are sold in approximately 100 countries and regions worldwide. ZEBRA PEN UK our sales subsidiary, distributes our products in the United Kingdom and across various European countries. ZEBRA PEN UK supplies products to retailers, corporate clients, and online consumers.

In the course of manufacturing our products, Zebra Group works with a large number of suppliers both domestically and internationally. From the procurement of raw materials to the delivery of finished goods, our supply chain spans multiple countries and regions and involves diverse working environments.

We recognize that there are relatively higher risks of modern slavery in the following areas:

- Suppliers of our products (particularly raw material suppliers such as ink ingredients and metal components)  
Some raw materials are sourced from countries or regions where labour conditions and human rights protections may be insufficient. As a result, there is a potential risk of forced labour or child labour. In particular, the extraction and processing of mineral resources and chemicals may involve poor working conditions and the exploitation of workers.
- Foreign workers within the supply chain  
In certain parts of our procurement and manufacturing processes, foreign workers are employed. These workers may be subject to unfair contracts or unreasonable working conditions imposed by intermediaries, creating a risk of exploitation and exposure to modern slavery, including human trafficking.

## **4. OUR POLICIES RELATING TO HUMAN RIGHTS AND THE MODERN SLAVERY ACT**

ZEBRA Group operates its business activities based on the corporate philosophy of “Open your imagination.”, believing in the joy and possibilities that a single pen can create. We believe that imagination is born out of a sense of security without discrimination, and that it is founded on respect for all human rights. We place respect

for human rights at the core of our corporate philosophy, and have established policies on human rights and child labour, through which we remain committed to fulfilling our responsibilities.

- Zebra Group Human Rights Policy
- Policy on the Prohibition of Child Labour, Forced Labour Discrimination and Bribery

## **5. INITIATIVES AND PERFORMANCE IN PREVENTING MODERN SLAVERY AND HUMAN TRAFFICKING**

Zebra Group implements a phased and ongoing due diligence process to identify and assess the risks of slavery and human trafficking in its business operations and supply chain, and to prevent or remediate such risks.

- **Risk Identification and Assessment**  
We focus on assessing human rights risks in the procurement of raw materials related to the manufacturing of writing instruments (such as ink ingredients, metal components, and plastic resins) and in outsourced operations (e.g., assembly and packaging), taking into account industry characteristics and the geographical locations of suppliers. Countries and regions with underdeveloped legal frameworks or labour conditions are considered high-risk and receive particular attention.
- **Supplier Investigation and Monitoring**  
For key suppliers identified as high-risk, we conduct written surveys and, where necessary, considers on-site visits or audits by third-party organizations. This ensures regular verification that forced labour or exploitative labour practices are not being employed.
- **Incorporation into Contracts and Policies**  
All major suppliers are required to formally acknowledge and comply with provisions prohibiting modern slavery and human trafficking, respecting human rights, and cooperating with corrective measures.
- **Internal Structure and Continuous Improvement**  
We have established a due diligence framework within relevant internal departments, including internal reporting mechanisms and procedures for responding to identified risks. In addition, employee training programs, such as harassment prevention training, are conducted to raise awareness of human rights risks and strengthen the ability to respond appropriately.

Zebra Group has established the following indicators to verify that slavery and human trafficking do not occur in its business operations and supply chains, and to assess the effectiveness of its preventive measures.

- **Monitoring of Reports**  
One of the key evaluation indicators is the absence of reports concerning modern slavery within Zebra Group or its supply chains, submitted by employees, the general public, suppliers, or law enforcement authorities. As of the present, no such reports have been confirmed.

## **6. TRAINING**

Zebra Group continuously provides training, including on harassment, to employees in order to promote the principles of human rights respect as set out in the Zebra Group Human Rights Policy.

石川 太郎

President, Taro Ishikawa  
**ZEBRA HOLDINGS CO., LTD.**  
Date: 2025/ 11/ 25