

Anritsu Group – Modern Slavery Statement (October 2018 through March 2019)

This statement describes the activity from October, 2018 through March, 2019. The plan was announced as “Anritsu Group – Modern Slavery Statement” in September, 2018.

In order to make the report, from this point forward in line with the fiscal year of Anritsu Group, this statement period has been made to cover half a year.

Efforts to respect human rights

Anritsu Group established the Charter of Corporate Behavior and the Code of Conduct for the common code of all Anritsu Group employees based on “Respect for Human Rights” in the ten principles of United Nation Global Compact and the international norms. And we have been promoting CSR management (Currently called “Sustainability Management”) with the policy of “Respect for Human Right”, no child labor and no forced labor. Additionally we have distributed “Anritsu Group CSR procurement guideline” to our Japanese suppliers and tried to establish the supplier code in the CSR procurement guideline.

In March 2015, “Modern Slavery Act 2015” (“UK Modern Slavery Act”), aimed at regulating child labor, forced labor, slavery, servitude and human trafficking, was enacted in the United Kingdom. Our activity for the respect of the human rights corresponds with the object of law, therefore Anritsu Group has published Modern Slavery Statement in line with the requirements of UK Modern Slavery Act. This opportunity Anritsu Group will promote respect of human rights and will strengthen CSR procurement management with the global suppliers.

Organizational Structure, Business and Supply Chain

Anritsu is a cutting-edge company involved in ICT (Information and Communication Technology) services comprised of Anritsu Corporation, 43 subsidiaries and an affiliated company that provides innovative solutions that support building next-generation networks. It is the top supplier of mobile measurement, and delivers high-dimensional quality assurance including safety which has increasing needs in areas such as the food processing market

As a subsidiary of Anritsu Corporation, Anritsu EMEA Ltd. has its head office at Luton in UK and carries out mainly sales and maintenance of communications measuring instruments in the Europe, Middle East and Africa regions.

The Group’s supply chain in relation to its products and services is also expanding globally.

Details of Anritsu Group’s corporate activities are published on the following websites:

Japan - <https://www.anritsu.com/ja-JP/> UK - <https://www.anritsu.com/en-GB/>

Human Rights Policy

Anritsu Group has a common Company Philosophy, Company Vision and Company Policy as guidelines for its corporate activities. In addition, with the Group's business expanding globally, it has agreed to and participated in the United Nations Global Compact which provides conduct principles as a global company. Anritsu also promotes Sustainability Management by establishing "Anritsu Group Charter of Corporate Behavior" and "Anritsu Group Code of Conduct" as guidelines for daily conduct.

*** Anritsu Group Charter of Corporate Behavior**

The policy of "Protecting Human Rights" is stated in Anritsu's corporate conduct guidelines, "Anritsu Group Charter of Corporate Behavior".

Protecting Human Rights: The Anritsu Group will respect the human rights of all those who are connected with it, and will not permit any discriminatory practice related to race, gender and so forth or infringement of individual dignity, and will never accept child labor or forced labor.

*** Anritsu Group Code of Conduct**

"Anritsu Group Code of Conduct", which prescribes the conduct of all Anritsu Group employees, includes the policies set forth below.

Respect of Human: We will respect every person's fundamental human rights from a defender of human dignity standpoint, eliminate prejudice, and will not discriminate depending on race, nationality, religion, creed, sex, age, social status, or disabilities whether mental or physical.

Anritsu Group's Human Rights Due Diligence Process (including the report of activity)

On joining the company, all employees are given "Anritsu Group Code of Conduct", which includes "Protecting Human Rights", and they make a pledge to comply with the Code of Conduct. Every year, they are conducted education to reaffirm the importance of respect for human rights, and they are also required submission of a written confirmation of compliance with the code of conduct. Furthermore, whether or not there are compliance issues, including in the area of protecting human rights, is checked and appropriately dealt with through regular corporate ethics surveys, whistle blowing and other means.

The activities in the period are as follows.

- October 2018 : The regular corporate ethics surveys were performed in "Corporate ethics promotion month". The contents of the surveys include laws and regulations related to human rights.
- March 2019 : The above result of the corporate ethics survey was reported to the Management Strategy Conference as "No violation on compliance of any major laws and regulations".
- March 2019 : "Anritsu Group Compliance Activity Report FY2018" included the activity of "UK Modern Slavery Act" was reported to the Board of Directors.

- April 2019 : All of the employees of Japan Anritsu Group is to submit a written pledge confirming compliance to the "Anritsu Group Code of Conduct". As for all of the overseas Anritsu Group Employees, similar pledge is expected to be submitted after October 2019.

Supply Chain Human Rights Due Diligence Process

The Anritsu Group CSR Procurement Guideline is distributed to supply chain business partners to seek their understandings of the Guideline. Also, letters of consent are obtained from the business partners to the effect that they will respect and cooperate with initiatives for the CSR Procurement Policy.

Anritsu also conducts CSR procurement surveys to its business partners. Based on the results of the surveys, we conducted the audit of several business partners. By further strengthening this initiative, we will grasp the actual situation of CSR procurement in the supply chain, and strive to penetrate and improve CSR procurement.

The surveys include the questions concerning the following topics:

1. Prohibit forced labor,
2. Prohibit inhumane treatment and infringements of human rights,
3. Prohibit child labor,
4. Prohibit discrimination,
5. Pay appropriate wages,
6. Regulate working hours,
7. Respect the rights to freedom of association

Supply Chain Risk Assessment (including the report of activity)

Anritsu grasps human rights risks in the supply chain by analysing and assessing the content of the answers to the CSR procurement surveys. It also holds briefings for supply chain business partners, several times a year, to explain Anritsu Sustainability Management and CSR Procurement Policy and requests their understandings of CSR procurement.

The effectiveness of the supply chain business partners' CSR procurement is confirmed from the content of the answers to the CSR procurement surveys, as well as by monitoring the number of answers and response rates to the surveys. In addition, site visits to supply chain business partners have been scheduled to be conducted to confirm the effectiveness of CSR procurement in the supply chain.

In the period from October 2018 through March 2019, we conducted the following human rights due diligence activities in order to understand human rights risks in the supply chain.

- In the business partner meeting, the Global Procurement Operation Division introduced about "Sustainability Policy", "SDGs" and "Anritsu Group Modern Slavery Statement" to the participant business partner companies, and ask to cooperate the CSR survey and/or the factory audit.
- Among the major suppliers in Japan and overseas, we conducted CSR procurement survey for 95 companies targeted for the survey this fiscal year. From the analysis and evaluation results of the questionnaire responses and the results of the audits of several suppliers, we confirmed that there were no urgent problems at present and human rights risk was low.

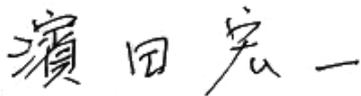
- The activities related to “Human Rights Due Diligence for Supply Chain” from April 2019 are scheduled to be as follows.
 - ① Request business partners to communicate the CSR Procurement Policy and ask for cooperation.
 - ② Implementation of the audit for domestic and overseas business partners regarding the human rights.

Enlightenment/Training (including the past and the report of activity)

We have performed the following enlightenment and WBT (Web based training) related to all of the employees of Anritsu Group globally.

- October 2016 : “ UK Modern Slavery Act” was introduced to all of the employees of Anritsu Group in Japan by the company newsletter.
- December 2016 : “ UK Modern Slavery Act” was introduced to all of the employees of Anritsu Group in the world by using the English company newsletter.
- January through March of 2017 : The WBT of human right and “UK Modern Slavery Act” was performed for understanding by all Anritsu Group employees globally.
- March 2018 : All of the employees in Anritsu EMEA Limited have completed the WBT of “UK Modern Slavery Act”.

This statement has been approved by the Board of Directors in June 2019.



Hirokazu Hamada

Representative Director, a member of the Board
President and Group CEO

June 2019