

UK Modern Slavery Act 2015 Transparency Statement

Summary

This document is the Modern Slavery Act 2015 Transparency Statement for the financial year January to December 2025 of Renesas Electronics Europe GmbH (Germany, HRB 3708) which is part of the Renesas Electronics Corporation group (TSE: 6723, Japan). The company carries on business in the United Kingdom through its branch (Companies House No. FC023805), which forms part of the German entity and is not a separate legal person. Renesas designs and supplies semiconductor solutions globally. Renesas Electronics Europe GmbH is committed to preventing modern slavery and human trafficking in its operations and supply chains and to complying with applicable UK legal requirements.

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Introduction

This statement is made pursuant to section 54 of the United Kingdom Modern Slavery Act 2015 and sets out the steps taken by Renesas Electronics Europe GmbH to prevent modern slavery and human trafficking in its operations and supply chains during the financial year ending December 2025. This statement applies to Renesas Electronics Europe GmbH, including its UK branch (Companies House No. FC023805), which carries on business in the United Kingdom.

Organisation Structure and Supply Chains

Renesas Electronics Europe GmbH is a company incorporated in Germany with registered number HRB 3708 at the Commercial Register (Handelsregister) of the Local Court (Amtsgericht) Düsseldorf. The company is a subsidiary of Renesas Electronics Corporation (TSE: 6723), a global semiconductor manufacturer headquartered in Tokyo, Japan.

Renesas Electronics Europe GmbH operates in multiple jurisdictions across Europe and conducts business in the United Kingdom through its registered UK branch (Companies House No. FC023805). The UK branch is not a separate legal entity but constitutes a branch of Renesas Electronics Europe GmbH and forms part of its overall operations.

The Renesas group designs, develops, and supplies semiconductor solutions supporting a range of applications, including automotive, industrial, infrastructure, and Internet of Things (IoT) sectors. Within Europe, Renesas Electronics Europe GmbH undertakes activities such as sales, marketing, research and development, and support functions, operating as part of the wider Renesas global group structure.

As a subsidiary within the Renesas group, Renesas Electronics Europe GmbH operates under group-wide governance frameworks, policies, and procedures, while maintaining responsibility for compliance with applicable legal requirements within each jurisdiction in which it operates, including the United Kingdom.

The organisational structure of the Renesas Group comprises multiple legal entities and operational sites, reflecting the global and technology-intensive nature of the semiconductor industry. This statement is made pursuant to section 54 of the United Kingdom Modern Slavery Act 2015 and applies to Renesas Electronics Europe GmbH, which carries on business in the United Kingdom through its registered UK branch (Companies House No. FC023805) and falls within the scope of the Act. Where appropriate, this statement also references activities and supply chain arrangements within the wider Renesas Group to reflect the integrated nature of group operations and procurement. Oversight of compliance with the Modern Slavery Act is supported through group-level governance, policies, and risk management frameworks, while recognising that individual legal entities remain responsible for implementing applicable requirements within their respective operations.

Renesas' supply chain is global, complex, and multi-tiered, involving a diverse range of suppliers across different regions. Key elements of the supply chain include suppliers of raw materials, such as silicon wafers, specialty chemicals, and metals; manufacturers of production equipment and components; and subcontracted assembly, testing, and packaging partners, primarily located in Asia and parts of Europe.

In addition, Renesas engages logistics providers and professional service suppliers that support its operations and product delivery. Due to the nature of semiconductor manufacturing, certain upstream supply chain stages—particularly the extraction and processing of minerals and the use of contract manufacturing and labour-intensive services—may present an increased risk of modern slavery and human trafficking.

While Renesas does not directly source raw materials from mines or manage labour at subcontracted facilities, it recognises that these risks may exist beyond its immediate Tier 1 suppliers. As a result,

Renesas focuses its initial efforts on understanding its direct supplier base and embedding expectations for ethical labour practices throughout its supply chain relationships.

Renesas is at an early stage in systematically mapping its supply chains for the purposes of UK Modern Slavery Act reporting. During this reporting period, the company has prioritized developing a high-level understanding of its operational footprint and supplier categories. This includes identifying key supplier types, geographic regions of operation, and areas where enhanced due diligence may be required in the future.

Renesas progressively increases supply chain transparency and depth of risk assessment over time as its processes and data capabilities mature.

Governance

Governance arrangements support oversight of modern slavery risk through cross-functional collaboration across procurement, compliance, sustainability, and human resources.

Board-Level Accountability

Ultimate accountability for Renesas' approach to modern slavery rests with the Board of Directors of Renesas Electronics Corporation. The Board exercises oversight of human rights and modern slavery risks through the Audit and Sustainability Committee (ASC), which receives regular progress updates on modern slavery reporting, governance development, and risk management activities.

This Modern Slavery Statement was approved by the Managing Director (Geschäftsführung) of Renesas Electronics Europe GmbH which constitutes the executive management body under German corporate law prior to publication, in accordance with the requirements of Section 54(6) of the Modern Slavery Act 2015.

Operational Leadership: Sustainability (SU)

Day-to-day operational leadership for modern slavery governance is held by the Sustainability (SU), under the direction of the Senior Director, Head of Sustainability. The SU is responsible for overall programme coordination, policy guidance, statement preparation, and management of the Board sign-off process. The SU also coordinates cross-functional alignment across Legal, Human Resources, and Procurement on modern slavery-related activities.

Human Rights Working Group (HRWG)

To strengthen Renesas' human rights governance and reinforce the due diligence framework across the Renesas Group, the Human Rights Working Group (HRWG) was established in 2025 under the Sustainability Operating Team (SOT). The HRWG serves as the primary cross-functional governance platform bringing together cross-functional representation across Units/Groups (Sustainability, Legal, HR, Procurement, and regional representatives) for the identification, assessment, and management of human rights risks — including modern slavery — across Renesas' global operations.

Governance Reporting Cycle

Reporting activity	Frequency	Audience
HRWG operational review	Fortnightly	HRWG members
ASC governance update	Quarterly	Audit & Sustainability Committee
Annual sign-off of MSA Statement	Annual	Renesas Electronics Europe GmbH Managing Director
Business & Sustainability Report disclosure	Annual	External / public
MSA Statement publication (GOV.UK Registry)	Annual	UK Home Office / public

Policies in Relation to Modern Slavery

Renesas is committed to conducting its business responsibly and with respect for internationally recognized human rights. This includes a [Global Human Rights Policy](#) commitment to preventing modern slavery and human trafficking within its operations and supply chains.

Renesas currently maintains an established [Supplier Code of Conduct](#), which sets out expectations for ethical business behaviour and responsible sourcing. The Supplier Code of Conduct references labour standards aligned with internationally recognized principles, including respect for human rights, prohibition of forced labour, child labour, and unlawful employment practices, as well as requirements relating to fair treatment, health and safety, and ethical conduct. Suppliers are expected to comply with applicable laws and regulations and to operate in a manner consistent with these standards as a condition of doing business with Renesas.

Alignment with International Standards

We base our approach to preventing modern slavery and protecting workers' rights on widely recognised international guidance. Our Global Human Rights Policy, Supplier Code of Conduct and the checks we carry out on our supply chain are designed to be consistent with the following:

UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Due Diligence Guidance for Responsible Business Conduct, and relevant International Labour Organization (ILO) labour standards.

The policies are reviewed annually and communicated across our global operations and supplier network. Renesas engages employees as a primary stakeholder group to understand their human rights concerns and expectations. Periodic training programs are provided to embed human rights commitments across the workforce. Furthermore, the Renesas Electronics Group Hotline allows employees, suppliers, contractors, and other partners to confidentially report or consult on compliance-related concerns, including potential legal or ethical violations, either anonymously or with their name. Reports are submitted via a secure third-party provider, Navex Global, through an [online form or international toll-free phone service](#), ensuring confidentiality unless disclosure is legally required. Upon receipt, reports are reviewed by Legal and Human Resources, investigated in a timely manner, and prioritised based on the severity, scale, and irremediability of the potential harm, in line with the UN Guiding Principles on Business and Human Rights (UNGPs). Where an incident is identified, remediation may include immediate removal of the affected individual from harm; formal investigation led by HR and Legal; development of a time-bound Corrective Action Plan (CAP); provision of appropriate remedy (which may include financial compensation, rehabilitation, or referral to support services); and, where a supplier fails to remediate, escalation up to and including

termination of the business relationship. Outcomes are reported to the HRWG and, where material, to the ASC. During the reporting period, no incidents of modern slavery were identified in Renesas Electronics Europe's own operations or direct supply chain, whether through the Group Hotline, supplier assessments, RBA VAP audits, or any other channel.

The Supplier Code of Conduct forms the foundation of Renesas' approach to addressing modern slavery risks within its supply chain. It is applicable to direct (Tier 1) suppliers and is intended to communicate minimum expectations regarding labour practices and ethical behaviour. While Renesas does not yet have a standalone modern slavery policy, the principles relevant to preventing slavery and human trafficking are embedded within existing procurement, compliance, and ethical sourcing frameworks.

Recognizing the evolving nature of regulatory and stakeholder expectations under the UK Modern Slavery Act 2015, Renesas has committed to developing a dedicated Modern Slavery Policy. This policy is intended to further articulate Renesas' approach to identifying, preventing, and mitigating risks of modern slavery and human trafficking in its operations and supply chains. The development of this policy will be informed by relevant international standards and industry frameworks, including those of the Responsible Business Alliance (RBA), which is widely adopted within the semiconductor and electronics sector.

This will enhance clarity for internal stakeholders and suppliers and support the progressive strengthening of due diligence and supplier engagement practices over time. The policy will be reviewed and updated as necessary to reflect regulatory developments, business growth, and increased understanding of modern slavery risks within the semiconductor supply chain.

Due Diligence

Risk Assessment and Management

Renesas recognizes that the risk of modern slavery and human trafficking may exist within global supply chains, including those associated with the semiconductor industry. During the reporting period, Renesas undertook an initial, high-level consideration of potential modern slavery risks within its operations and supply chains, reflecting the early stage of its formal modern slavery risk assessment processes and its approach under UK Home Office Level 1 reporting guidance.

This initial consideration focused on identifying broad areas of potential risk, rather than conducting detailed or comprehensive risk assessments. Renesas identified certain raw materials, including cobalt, tantalum, and tungsten, as materials that may be associated with elevated modern slavery risks at upstream stages of the supply chain, due to their potential links to artisanal and small-scale mining in some regions. These materials are typically sourced indirectly through multiple tiers of suppliers, beyond Renesas' direct contractual relationships.

Renesas also identified subcontracted manufacturing and labour-intensive activities in certain geographic regions, including parts of Southeast Asia, as areas where modern slavery risks may be more likely to arise. This reflects widely recognized challenges in complex, multi-tier supply chains and does not indicate the identification of confirmed instances of modern slavery within Renesas' operations or supply base.

At this stage, Renesas' approach to managing modern slavery risk is foundational and risk based. While formal due diligence processes continue to develop, the company has already established baseline measures to support risk identification, escalation and supplier engagement, including the Supplier Code of Conduct, cross-functional oversight, and risk-informed supplier review. Based on its initial risk consideration, Renesas prioritises enhanced due diligence and mitigation efforts toward supplier categories

and supply chain areas more likely to present higher inherent risk, with further measures to be strengthened over time as processes and data maturity develop.

Related activities address:

Activity	Responsible Function
Overall risk assessment coordination	Sustainability (SU)
Supplier risk identification & spend analytics	Procurement / SCM
Internal operations risk assessment	Human Resources (HR)
Legal compliance & jurisdictional risk	Legal
Risk register maintenance & escalation	HRWG (coordinated by SU)

Human Rights Due Diligence Process

Renesas' human rights due diligence approach is foundational and continuing to develop. During the reporting period, the company operated baseline controls intended to support the identification, assessment and escalation of potential labour and human rights risks, including supplier acknowledgement of the Supplier Code of Conduct, relevant procurement and compliance escalation channels, and Group-level risk-based screening processes informed by the UN Guiding Principles on Business and Human Rights.

For the purposes of this Statement, due diligence activities are focused primarily on the UK operations and Tier 1 supplier relationships relevant to the reporting entity, while drawing on Group-wide policies and frameworks, including the Code of Conduct, Procurement Policy and Supply Chain CSR Guidebook. These measures provide a consistent starting point for due diligence, with further enhancement of processes, coverage and documentation planned over time.

Supplier Engagement

Renesas applies a foundational, risk-based approach to supplier engagement and oversight. Suppliers are prioritised for review and engagement based on factors such as geography, sectoral risk and business criticality. The Renesas Supplier Code of Conduct, which is aligned with the Responsible Business Alliance (RBA) Code of Conduct, establishes baseline labour and ethical expectations for supplier relationships, including compliance with applicable laws and prohibitions on forced labour and human trafficking. As due diligence processes continue to develop, Renesas uses this framework to support prioritised supplier engagement and the progressive strengthening of risk mitigation measures over time.

Supplier Code of Conduct

All in-scope suppliers are required to adhere to the Renesas Supply Chain Code of Conduct, aligned with the Responsible Business Alliance (RBA) Code of Conduct v8.0. The Code explicitly prohibits forced

labour, child labour, document retention, and recruitment fee charging, and requires suppliers to ensure that labour-related policies — including workplace rights — are communicated to all workers in a language they understand, covering migrant, temporary, and contract workers. In 2024, 92% of global in-scope suppliers confirmed consent to the Code, against a mid-term target of 100% by 2028.

ESG Self-Assessment Questionnaire (ESG SAQ)

Renesas administers an annual ESG Self-Assessment Questionnaire (ESG SAQ) to all Tier 1 in-scope suppliers, with the support of assessment platform provider ASUENE. The SAQ includes questions specifically relevant to modern slavery risk, including whether suppliers have:

- A modern slavery or anti-forced labour policy approved by senior management;
- Mechanisms to ensure labour policies are communicated to workers in a language they understand;
- Accessible worker grievance mechanisms, with protection against retaliation;
- Controls to prevent recruitment fee charging and ensure workers retain their own identity documents;
- Compliance with applicable working hours laws and voluntary overtime standards; and
- Processes to extend due diligence to sub-suppliers and third-party labour providers.

SAQ results are analysed by Renesas' Procurement, which shares consolidated insights with Sustainability and the Human Rights Working Group (HRWG). The HRWG reviews consolidated findings, evaluates areas for improvement, and oversees the prioritisation of high-risk suppliers for further engagement or escalation. In 2024, more than 150 suppliers responded to the SAQ.

RBA Assessments integration into Modern Slavery Risk Management

Renesas conducts Responsible Business Alliance (RBA) Validated Assessment Program (VAP) audits at its own manufacturing facilities, including the Penang and Naka sites, which have achieved RBA Platinum certification. These assessments evaluate performance across labour, health and safety, environmental, ethics and management systems in accordance with the RBA Code of Conduct.

In parallel, Renesas requires suppliers to adhere to its Supplier Code of Conduct, which is aligned with the RBA CoC, and administers annual ESG self-assessment questionnaires (SAQs) to in-scope suppliers to support the identification and assessment of labour-related risks, including those associated with forced labour and worker rights.

Renesas applies a risk-based approach to supplier engagement, using SAQ outputs and other risk indicators to prioritise further due diligence activities, which may include targeted engagement or audits.

While RBA VAP audits primarily focus on internal manufacturing operations, the findings and observations from these assessments are reviewed as part of Renesas' broader efforts to strengthen its human rights and modern slavery risk management framework. This includes consideration of how audit-related insights may support the ongoing refinement of supplier due diligence processes and risk assessment tools over time.

Programme Development Priorities

Over the next 12 months, Renesas will strengthen its risk-based due diligence approach by:

- embedding modern slavery risk considerations into supplier onboarding and renewal processes;
- introducing a standardised modern slavery questionnaire for Tier 1 suppliers, focused on key labour-rights risk areas; and
- applying enhanced checks for suppliers operating in higher-risk sectors or regions, in line with UK Home Office guidance.

As part of its ongoing programme development, Renesas will review the feasibility of strengthening supplier risk assessment processes by considering whether additional modern slavery-related questions or data points can be incorporated into existing supplier assessment channels, including the ESG SAQ process.

This review may include consideration of relevant risk indicators such as supplier geography, workforce profile, use of migrant or temporary labour, recruitment practices, and known incident, grievance or audit history, where such information is available and appropriate to assess. The initial focus will be on understanding data availability, avoiding duplication with existing assessment processes, and identifying practical options for future process enhancement.

Any significant potential red flags identified through available information will be reviewed through existing governance channels, including the Human Rights Working Group, to determine an appropriate response.

Responsible Minerals Sourcing

Renesas operates a responsible minerals programme aligned with internationally recognised due diligence frameworks for minerals from conflict-affected and high-risk areas. This includes engagement with the Responsible Minerals Initiative (RMI), identification of smelters and refiners in relevant supply chains, and use of industry-standard reporting templates for 3TG and other minerals such as cobalt and mica. Progress is reviewed and disclosed annually as part of broader sustainability reporting.

Training and Monitoring

Training and awareness activities currently focus on employees involved in procurement and supplier management. As the programme matures, Renesas intends to expand role-appropriate training, integrate modern slavery content into existing compliance frameworks, and monitor participation and effectiveness over time.

Progress will be reviewed using defined metrics and will inform continuous improvement and future reporting.

Key Performance Indicators (KPIs) and Timelines

The following indicators are intended to support transparent reporting on the implementation and progressive strengthening of Renesas' approach to identifying, assessing and addressing modern slavery risk.

These indicators are phased across successive reporting cycles and are intended to show both implementation progress and the ongoing development of programme effectiveness over time.

Renesas does not currently maintain a standalone Modern Slavery Policy. At present, relevant expectations and processes are addressed through the Global Human Rights Policy, Supplier Code of Conduct, and internal remediation procedures. The development of a dedicated Modern Slavery Policy remains a priority as part of the ongoing enhancement of the programme.

Next reporting cycle / FY2026 priorities:

- Establish a dedicated Modern Slavery Policy led by Sustainability with cross-functional input from Legal, Procurement and Human Resources.
- Identify priority Tier 1 suppliers by purchasing spend to support initial risk-based assessment and engagement, led by Procurement with oversight from Sustainability.
- Deliver modern slavery awareness training to procurement personnel and extend relevant training to other functions involved in programme delivery, coordinated by Sustainability in collaboration with Human Resources and Procurement.

FY2027:

- Expand completion of the modern slavery self-assessment questionnaire across suppliers representing a substantial proportion of Tier 1 purchasing spend, led by Procurement with Sustainability support. Review the feasibility of incorporating additional modern slavery-related data points into existing supplier assessment processes, including the ESG SAQ, and assess data availability for selected risk indicators to inform future programme development.
- Finalize and publish a dedicated Modern Slavery Policy with cross-functional input from Sustainability, Legal, Procurement and Human Resources.
- Enhance transparency on value chain risk exposure through a more structured risk-mapping and heatmap approach with Sustainability oversight.

FY2028:

- Further increase supplier questionnaire coverage and strengthen the use of questionnaire results to inform ongoing risk prioritisation and engagement, led by Procurement with Sustainability oversight.

Commitment to Continuous Improvement

Oversight of Renesas' approach to modern slavery reporting is supported through existing governance arrangements. In line with Section 54 of the UK Modern Slavery Act 2015, the Modern Slavery Statement is subject to review and approval at senior management and Board level prior to publication.

The approved statement is published on the company's website and is intended to be reviewed and updated on an annual basis to reflect the company's evolving understanding of modern slavery risks and related activities.

As its approach continues to develop, Renesas intends to enhance governance and reporting arrangements, including by considering the use of relevant management information to support senior-level oversight of modern slavery-related risks and activities.

In preparing this statement, Renesas has had regard to internationally recognised standards and guidance relevant to responsible business conduct, including elements of OECD guidance where applicable. Consistent with the transparency objectives of the UK Modern Slavery Act, the statement seeks to provide a clear and accurate description of Renesas' current approach, including recognised limitations and areas identified for future development.

We will enhance our approach year-on-year, including deeper supply chain transparency and collaboration with industry initiatives.

This statement was approved and signed by the Managing Director of Renesas Electronics Europe GmbH on 15 June 2026.

Renesas Electronics Europe GmbH

Carsten Jauch, Managing Director

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Appendix - Reporting entities and Abbreviations

Entity	Jurisdiction of incorporation / registration	Description
Renesas Electronics Corporation (JP3164720009)	Japan	WW Headquarters
Renesas Electronics Europe GmbH (HRB 3708)	Germany	Wholly owned by Renesas Electronics Corporation
Renesas Electronics Europe GmbH (FC023805)	UK (branch registration)	UK Branch registration of Renesas Electronics Europe GmbH
SU		Sustainability
HR		Human Resources
Procurement		Procurement
SCM		Supply Chain Management