



**Kodak Limited (UK)**  
**UK Modern Slavery Act (Transparency in Supply Chains Act, 2015) Report**  
**Reporting for FY 2025**

## Introduction

This UK Modern Slavery Act (Transparency in Supply Chains Act, 2015) Report is submitted by the subsidiary of Eastman Kodak Company operating in the United Kingdom – namely Kodak Limited (UK) in the United Kingdom or “Kodak UK” for purposes of this report. Full legal details, including registered addresses, are provided in Appendix A.

This report is prepared in accordance with The UK Modern Slavery Act (Transparency in Supply Chains Act), 2015, for the fiscal year spanning from Jan 1, 2025, to Dec 31, 2025:

## I. Business Structure, Operations, Activities, and Supply Chains

### 1. Organization and supply chain structure

Eastman Kodak Company (together with its direct and indirect subsidiaries, “Kodak”) was founded by George Eastman in 1880 and incorporated in 1901 in the state of New Jersey, USA. Kodak is a global company employing about 3,600 employees, specializing in imaging, printing, film, advanced materials, and chemical manufacturing and operating through the parent company headquartered in Rochester, New York, USA and multiple subsidiaries worldwide including Kodak UK

Kodak UK’s operations include business offices in the UK.

Kodak’s supply chain operates internationally, with direct and indirect suppliers and manufacturing partners across North and South America, Europe, Africa, and Asia, sourcing raw materials, chemical components, packaging, software, electrical components, tools, and equipment. Production and assembly activities occur in Kodak-owned or partner facilities across these regions, and goods are distributed through the regional hubs and authorized distributors.

### 2. Products, sectors, and services

The primary general products and services of Kodak include digital and traditional imaging materials, commercial printing systems, specialty chemicals, still and motion-picture film, and

related services, operating within the commercial print, imaging, materials science, and film sectors and producing large volumes of print consumables, imaging components, and chemical-based products annually.

In the UK, Kodak UK maintains selling, distribution, and service functions to support UK-based customers. Additionally, some business support functions (e.g. customer order service, credit & collections, legal, procurement, and logistics) maintain an employee presence in the UK.

### 3. Modern slavery risk management governance

Modern slavery identification, assessment, and response are conducted through a cross-functional process led by Kodak's Health, Safety, and Environment (HSE)-Product Stewardship department with input from our Procurement, Human Resources, Legal, and the broader HSE departments.

### 4. Information gathering

To prepare this report, Kodak personnel gathered information through consolidation of shared information, internal consultation amongst HSE, Procurement, and senior management teams, and review of supplier information, internal records, and subsidiary data across all entities included in this joint statement.

## II. Policy on Modern Slavery, Forced Labor, and Child Labor

### 1. Internal and external policies, protections, and standards

Eastman Kodak Company has an excellent reputation as an ethical, law-abiding company. Employees of Kodak must maintain the highest ethical standards in the conduct of company business, so that they and the company are always above reproach. Our [Business Conduct Guide](#) is based on the Responsible Business Alliances' (RBA) framework and provides a high-level summary of key company policies that reflect our commitment to ethical business conduct. This commitment to ethical behavior builds trust with our customers and improves the experience of all employees at Kodak. The Business Conduct Guide applies throughout the Kodak consolidated group of entities worldwide, from the newest employee of Eastman Kodak Company or a Kodak subsidiary to the company's or subsidiary's senior officers. Every Kodak employee is assigned annual training on the Business Conduct Guide, and starting in 2023, Kodak initiated assignment of training to our contingent workforce on the relevant sections of the Business Conduct Guide, including information on how to report conduct violations.

Additionally, Kodak's [Corporate Responsibility Principles](#) outline the company's commitment to many corporate and ethical values including and not limited to high ethical standards, respect and adherence to international and regional laws, and responsible environmental activities. Regarding labor laws, the principles also make clear that the company will not establish or maintain a business relationship with any supplier if Kodak believes that the supplier's practices violate local laws or fundamental principles relating to labor standards.

### 2. Continuous improvement

The Business Conduct Guide is reviewed regularly to ensure it continues to reflect our core values as a company today and remains consistent with industry standards and trends. Suppliers may be subject to audit, with reasonable notice, by Kodak directly. Within Kodak, employees responsible for procurement receive training on expectations outlined in the Corporate Responsibility Principles.

### III. Due Diligence, Risk Management, and Remediation Processes

#### 1. Due diligence and risk management processes

Kodak has developed several processes to review its supply chain and identify potential risk areas: firstly, as mentioned above in *Section II. Policy on Modern Slavery, Forced Labor, and Child Labor*, Kodak's Corporate Responsibility Principles state the company's vow to disengage from any suppliers believed to violate local laws or fundamental principles related to labor standards or environmental protection. Overall, Kodak requires its suppliers to comply with: (1) the Code of Conduct of the RBA which outlines practices expressly geared toward upholding the dignity and respect of workers and prohibiting the use of forced, bonded, indentured labor or involuntary prison labor, (2) [Kodak's Corporate Responsibility Principles](#), and (3) [Kodak's HSE Supplier Requirements for Articles, Chemicals, Electrical and Electronic Equipment, and Packaging \(named "EKSP-2285"\)](#) which is included in the terms and agreements of purchase orders issued to our suppliers and requires that products supplied to Kodak meet all applicable regulatory compliance requirements – including laws on human rights, labor, and social standards and laws on supply chain due diligence and transparency of the United Nations, the European Union, the United States of America, the United Kingdom, and other countries worldwide in its global business operations – during manufacturing, global distribution, and sale.

In 2023, Kodak initiated a project to strengthen our due diligence processes with suppliers, covering forced labor and child labor as well as a wider range of environmental, social, and governance topics relevant within our supply chains. To support this supply chain due diligence project, Kodak successfully implemented a third-party platform to (1) screen and audit our suppliers on related ESG topics like PFAS, Conflict Minerals, human rights and labor laws, and other regulatory compliance requirements and (2) identify risks before, during, and after supplier engagement to better serve Kodak's commitment to high quality and ethically-sourced products and materials.

In the continual process of risk management and identification, Kodak also adheres to the use of: (1) sanctions lists that are checked manually by trained personnel and automatically against our current suppliers in our ERP, (2) frequently-updated third party platforms that track and notify our Product Stewardship team of regulatory changes and updates in the relevant global marketplace, and (3) on-site visits to a subset of critical suppliers – all of which support the mitigation of risks to health and safety, environment, operations, non-compliance, product disruption, and more. And to strengthen this process, Kodak carries out the standard practices of labeling critical and non-critical suppliers, corrective action plans with suppliers, dual sourcing and supplier diversification when possible, escalation and remediation processes, and, as stated before, decisions to disengage with a supplier if risks cannot be mitigated.

## 2. Remediation processes

Kodak has not identified any instances of forced labor or child labor in our supply chain, nor have we identified the loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labor or child labor in our activities and supply chains. We therefore have not taken any measures to remediate these issues during the reporting year.

However, in the unlikely scenario that an employee believes they may have identified an incident of forced or child labor, Kodak has procedures in place to ensure there are no barriers to reporting. Our internal reporting and complaints channels are supported by an ethics and compliance alert line, which is established to enable employees to discreetly report infringements of our Business Conduct Guide, internal standards, and applicable laws. It is run by an independent external provider and is available globally, allowing both open and anonymous reporting. The alert line and alternative reporting channels are available to employees and third parties.

## IV. Training on Modern Slavery, Forced Labor, and Child Labor

### 1. Internal and external training

As mentioned above, Kodak utilizes several different methods of training to support its response to modern slavery, including but not limited to: annual training on the Business Conduct Guide to all Kodak employees (3,162 global Kodak employees and 251 global new hire employees trained in 2025); HR Training to US Kodak employees (1,475 non-supervisor and 213 supervisor-level employees trained in 2025); Privacy training (3,165 global Kodak employees trained in 2025); and Security training (3,165 global employees trained in 2025). Additionally, future proposed annual training on Kodak's HSE Product Standards to Kodak employees involved in purchasing products from suppliers and future proposed annual training on Kodak's EKSP-2285 to Kodak employees involved in commercialization efforts are scheduled to begin later in 2026 and are intended to continue each year.

## V. Effectiveness of Actions

Kodak takes several steps to measure the effectiveness of our prevention and detection measures. Kodak continues to train employees on the Business Conduct Guide and tools like Kodak's Product Standards and EKSP-2285 to identify and report violations and to understand our company's values and expectations with suppliers and the products we purchase. Kodak plans to continue to subscribe to sanctions lists and automate the daily check against our vendor list. Finally, with Kodak's recently implemented supply chain due diligence platform, our due diligence and risk management processes can be carried out more frequently and effectively, reducing overall supply chain risk. As a result of the aforementioned measures, Kodak has identified zero incidents of modern slavery, forced labor, and child labor in our supply chain.

## VI. Approval and Attestation

This statement covers Kodak Limited (UK) in accordance with the relevant regional legislation.

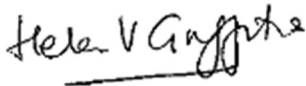
Kodak UK is a part of the global Kodak group of companies, which are directly or indirectly owned by Eastman Kodak Company, headquartered in Rochester, New York, USA.

As of December 31, 2025, the employee headcount for Kodak UK(including full-time and part-time employees) was 149

In witness whereof, the undersigned have executed this report as of the date set forth below and confirms that the information in the report is accurate to the best knowledge, information and belief of the undersigned as of the date set forth below.

Signed for and on behalf of Kodak UK:

**Kodak Limited (UK)**



By: \_\_\_\_\_

Name: Helen Griffiths

Title: Director of Legal Affairs EAMER and LAR, VP Legal

Date: 9 June 2026

## Appendix A: Reporting Entities

### **Kodak Limited (UK)**

Building 8  
Croxley Green Business Park  
Hatters Lane, Watford, Hertfordshire, WD18 8PX  
United Kingdom