



hemmersbach

FOR FINANCIAL YEAR 2025

Modern Slavery Act Transparency Statement

Prepared in accordance with the Australian Modern Slavery Act 2018 (Cth), the UK Modern Slavery Act 2015 and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the measures Hemmersbach Holding GmbH ("Hemmersbach") has implemented and continues to implement to prevent modern slavery and human trafficking within our business and supply chain.

Our dedication to making the world a better place through our direct actions and programs remains unwavering. As a social purpose corporation, our work transcends traditional business objectives, providing deeper meaning and purpose to our daily operations. Our commitment to transparency, fairness, and integrity not only fortifies our operations and business in the long term but also significantly contributes to impactful sustainability initiatives.

Our business

We are global IT infrastructure experts. As process experts with more than 25 years of experience, we empower IT industry leaders to provide Global Field Services and Global Device Lifecycle Services everywhere. We are their delivery engine. Our global reach, can-do attitude, more than 50 subsidiaries worldwide and over 5,000 colleagues, ensure that we are achieving our customers' quality goals.

A sustainable and resilient supply chain is crucial for our business. Our supply chain primarily consists of hardware suppliers and service providers. Whenever possible, we provide our services through our own permanent technicians. When this is not feasible, we engage with Hemmersbach Authorized Partners (HAPs) with whom we have direct contractual relationships. We prioritize long-term supplier relationships and promote ethical labour practices through our rigorous supplier onboarding and compliance procedures. To build supplier awareness and meet our standards, we focus on long-term agreements that address the risks of modern slavery, including debt bondage, forced labour, child labour and human trafficking.

The suppliers from whom we purchase hardware are usually Original Equipment Manufacturers (OEMs) with high standards. By focusing on these suppliers, we ensure a generally lower risk of modern slavery at the direct supplier level, as they are tightly controlled. Nevertheless, we recognize that risks may still exist in upstream supply chains, including raw material extraction, component manufacturing and logistics services, as well as in subcontracted service delivery models.

Policies and governance

Our colleagues are our most valuable resource and our goal is to provide a work environment where everyone has equal opportunities to develop and succeed.

We implement various internal policies to ensure ethical and transparent business practices. This includes our **Hemmersbach Policy for Social, Ethical, and Environmental Responsibility**, which is based on the Responsible Business Alliance Code of Conduct, ILO Declaration on Fundamental Principles and Rights at Work and the United Nations Declaration of Human Rights. These principles and commitments are reinforced in our global employment standards and explicitly prohibit forced labour, child labour, human trafficking and any form of exploitation.

Our **Supplier Code of Conduct** aligns with our policies and serves as the foundation for our contractual partnerships. This code ensures that our suppliers adhere to the same high standards of social, ethical, and environmental responsibility that we uphold. Our Labour Policy ensures that work is performed under an officially recognized employment relationship, established in compliance with applicable laws, regulations, and international labour standards.

Our **Sustainable Procurement Policy** reflects our commitment to responsible sourcing. These guidelines ensure that procurement activities minimize environmental impact, promote social responsibility, and uphold ethical standards. All procurement processes are carried out in compliance with international frameworks and Hemmersbach's internal policies. Procurement decisions also consider customer-specific requirements and contractual obligations, supporting our broader sustainability goals and long-term business success.

Our **Whistleblowing Policy** is designed to ensure that reports are handled effectively, confidentially, and in accordance with the EU Whistle-blower Protection Directive as well as any relevant local legislation, so that all stakeholders feel safe and supported in raising legitimate concerns regarding misconduct within our organization.

We maintain a robust **Recruitment Policy**, which includes verifying the eligibility to work in all relevant jurisdictions for all colleagues to safeguard against human trafficking and forced labour. Additionally, the effective abolition of child labour is a key priority for our Human Resources department, which ensures compliance with global standards and regulations.

Our governance framework for anti-slavery initiatives involves multiple levels of responsibility, ensuring comprehensive oversight and accountability. **Human Resources** plays a crucial role in developing, implementing, and maintaining policies related to modern slavery. Our **Sustainability Team** provides additional support and ensures alignment with our broader ESG strategy. **Procurement and Partner Management** functions are responsible for supplier engagement, onboarding and compliance monitoring. Ultimate responsibility for anti-slavery initiatives lies with our **Management Board**, demonstrating our commitment to transparency, fairness, and integrity in all our business dealings.

Risk assessment and due diligence

Our **risk assessment** process for identifying and addressing modern slavery risks in our operations and supply chains is thorough and systematic. This process follows a structured timeline with clearly defined responsibilities and includes regular assessments involving all relevant stakeholders within our organization to ensure a comprehensive view of potential risks.

We evaluate our partners based on risk factors derived from globally recognized indices such as the Corruption Perception Index, the Child Labour Index, the Global Peace Index and the Global Slavery Index, allowing us to make informed, data-driven decisions about potential vulnerabilities. Our methodology considers country risk, sector risk and business model risk, including the use of subcontractors and outsourced services. Risks are assessed and categorized to support prioritization and mitigation efforts. Identified risks are reviewed periodically to ensure ongoing vigilance and responsiveness to changes in our operating environment.

Regular updates and reports are provided to our Management Board, ensuring active oversight of identified risks and mitigation actions. We conduct rigorous **due diligence** to prevent and mitigate the risk of modern slavery in our operations and supply chains. Before establishing contractual relationships, we ensure compliance through a standardized onboarding process that guarantees consistent service quality globally.

We reserve the right to audit our suppliers to verify compliance with our Code and applicable laws, either on demand or as part of our regular audit schedule. Our audits are designed to maintain control and consistent quality across our supply chain. Any deviations or non-compliance identified prompt corrective actions and follow-up monitoring. To date, no confirmed cases of modern slavery have been identified through our audits or other sources; however, we recognize that risk may still exist and therefore continue to strengthen our processes and extend visibility beyond tier 1 suppliers.

Training and capacity building

To **raise awareness** of modern slavery and ensure compliance with our Social, Ethical, and Environmental Policy, we provide comprehensive training through our internal platform. This training is mandatory for all new colleagues and must be refreshed annually by every Hemmersbach employee.

We are committed to supporting our suppliers in understanding and complying with our anti-slavery expectations. Currently, we provide awareness materials to our partners and are further developing training and engagement initiatives aimed at strengthening supplier capabilities in identifying and addressing modern slavery risks. Structured remediation process and corrective action plans are implemented where risks are identified. Suppliers may be terminated if improvement is not demonstrated.

Reporting and accountability

We have established **mechanisms** for employees, suppliers, and stakeholders to report concerns related to modern slavery, including forced labour, child labour and exploitative working conditions. Reports can be directed to our Human Resources department, or submitted anonymously through our **whistleblowing tool**, which is accessible both internally and externally.

Upon receiving a report, we follow a structured investigation process designed to ensure confidentiality, impartiality and protection against retaliation. Where non-compliance is identified, appropriate corrective and disciplinary actions are taken in accordance with internal policies and legal requirements.

Effectiveness and performance indicators

We measure the effectiveness of our anti-slavery efforts using a range of indicators, including supplier audits conducted, compliance rates with our Supplier Code of Conduct, training completion rates, reported grievances and the implementation of corrective actions. These indicators support our ongoing monitoring and continuous improvement efforts.

We continue to enhance our approach by strengthening supplier screening processes, increasing awareness and improving oversight mechanisms. We are working towards further developing measurable targets to assess progress over time and ensure continuous improvement in our efforts to address modern slavery risks.

Closing Statement

This statement was prepared in consultation with our subsidiaries and controlled entities. The policies, risk assessments, and due diligence processes described in this statement are implemented consistently across the Hemmersbach Group to ensure alignment and accountability throughout our global operations.

Attestation

In accordance with applicable legislation, this statement has been reviewed and approved by the governing body of Hemmersbach Holding I attest that, to the best of my knowledge, the information contained in this statement is true, accurate and complete.

This statement was approved and signed by the Board of Directors of Hemmersbach Holding on 12.06.2026



Ralph Koczvara
Nuremberg, 12.06.2026



Dariusz Stanczyk
Nuremberg, 12.06.2026