

## ANTI-SLAVERY POLICY STATEMENT (“Policy”)

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The SLM Solution Group AG (“**SLM**”) has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

SLM is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015.

SLM expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes SLM includes specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children and SLM expects that its suppliers will hold their own suppliers to the same high standards.

The Policy applies to all persons working for SLM or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

The Policy does not form part of any employee's contract of employment and SLM may amend it at any time.

### Responsibility for the Policy

SLM has overall responsibility for ensuring the Policy complies with its legal and ethical obligations, and that all those under its control comply with it.

#### SLM SOLUTIONS GROUP AG

Estlandring 4  
23560 Lübeck  
Germany  
Phone +49 451 4060-3000  
Fax +49 451 4060-3250

Register Court Lübeck  
HRB 13827 HL  
Tax ID No. DE282823792  
info@slm-solutions.com

Executive Board:  
Sam O'Leary (CEO)  
Dirk Ackermann  
Charles Grace  
Chairman of the Supervisory Board:  
Hamid Zarringhalam

Deutsche Bank AG  
IBAN DE83 2307 0710 0035 9000 00  
Swift/BIC DEUTDEHH222  
Sparkasse zu Lübeck AG  
IBAN DE27 2305 0101 0160 1670 03  
Swift/BIC NOLADE21SPL



SLM has primary and day-to-day responsibility for implementing the Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels is responsible for ensuring those reporting to them understand and comply with the Policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

The addressee of the Policy is invited to comment on the Policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the CEO of SLM.

### **Compliance with the Policy**

The addressee of the Policy must ensure that they read, understand and comply with the Policy.

The prevention, detection and reporting of modern slavery in any part of the business of SLM or supply chains is the responsibility of all those working for SLM or under its control. SLM transmits its rejection of all forms of modern slavery, for instance, in its [Code of Conduct](#) as a guideline for its employees. The addressee of the Policy is required to avoid any activity that might lead to, or suggest, a breach of the Policy. The addressee of the Policy must notify their supervision or a Member of the Management Board of SLM as soon as possible if they believe or suspect that a conflict with the Policy has occurred or may occur in the future.

The addressee of the Policy is encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of SLM's business or supply chains of any supplier tier at the earliest possible stage.

If the addressee of the Policy believes or suspects a breach of the Policy has occurred or that it may occur, they must notify their supervision or a Member of the Management Board of SLM or report it in accordance with the Whistleblowing Policy of SLM using the [Whistleblowing-Hotline](#) as soon as possible.

The addressee of the Policy should note that where appropriate, and with the welfare and safety of local workers as a priority, SLM will give support and guidance to its

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suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If the addressee of the Policy is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of SLM's supply chains constitutes any of the various forms of modern slavery, they have to raise it with their supervision or a Member of the Management Board of SLM.

SLM aims to encourage openness and will support anyone who raises genuine concerns in good faith under the Policy, even if they turn out to be mistaken. SLM is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its own business or in any of its supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

If the addressee of the Policy believes that they have suffered any such treatment, they should inform their supervision or a Member of the Management Board of SLM immediately.

The Policy is intended for businesses in all countries, especially the United Kingdom.

### **Communication & awareness of the Policy**

Training on the Policy and on the risk SLM business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for SLM, and updates will be provided using established methods of communication between the business and the addressee of the Policy.

SLM's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of SLM's business relationship with them and reinforced as appropriate thereafter.

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## Breaches of the Policy

Any employee who breaches the Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. SLM may terminate its relationship with other individuals and organizations working on its behalf if they breach the Policy.

Lübeck, den 28.03.2023

SLM Solutions Group AG

Name: Sam O'Leary  
Titel: CEO  
Member of the Management Board

  
(Signature)

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