

Modern Slavery Statement of the Zühlke Group

Introduction

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

At Zühlke Group, which comprises all operating companies owned by Zühlke Technology Group Ltd., including Zühlke Engineering Ltd in the UK, we are committed to improving our practices to combat slavery and human trafficking in our business and supply chain. This statement outlines the actions we take to address these risks within our business and supply chain.

Our structure

Zühlke Group employs approximately 1600 people in 10 countries. This statement relates to Zühlke Technology Group Ltd., its structure and supply chain.

Our policies on slavery and human trafficking

Our Legal & Compliance team leads the development and implementation of policies to address modern slavery risks and ensure that all our colleagues are aware of our obligations. We adopt procedures that contribute to ensuring modern slavery does not occur in our business or our supply chains. We also expect organisations we transact with to adopt and enforce policies to comply with the legislation.

We are signatories of the UN Global Compact, supporting principles with respect to human rights, labour, environment and anti-corruption.

Our core values are integrity, courage, client success, and outstanding performance. These underpin our culture and how we do business. We ensure:

- our values, which are embedded throughout our business, set the parameters for how we expect our people to behave with colleagues, clients and third parties;
- we seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted;
- our policies and procedures are aligned with our culture and values. In particular, our Code of Conduct states that forced, child or punitive labour, slavery or human trafficking are not tolerated under any circumstances within our own organisation

Training

We provide online resources to all of our staff, including annual Code of Conduct training, to educate and raise awareness of the risks of modern slavery and human trafficking in our supply chains and our business.

Measures we take to combat slavery and human trafficking

We recognise that we are exposed to greater risk when dealing with our suppliers, particularly those who have operations in higher-risk territories. We take the following steps to understand and manage the risks:

- Prior to onboarding, we use a third party tool to undertake a risk-based assessment of suppliers who are deemed higher-risk, taking into account factors such as geographic location, nature of services provided, and supplier profile.
- We maintain a Supplier Code of Conduct, which we require third parties and new suppliers to abide by. In particular, the Supplier Code of Conduct does not tolerate forced labour or child labour in our supply chain.
- We maintain an Integrity Policy, which serves as a clear reminder to all our colleagues at Zühlke of their rights and responsibility to raise any concerns they may have around perceived wrongdoings within Zühlke or its clients and suppliers, including violations of anti-slavery and human trafficking laws.
- Integrity Line is the whistleblowing hotline and reporting system of Zühlke Group which allows our people and third parties to report any suspected misconduct or wrongdoing anonymously.

Our effectiveness in combating slavery and human trafficking

We use the following measures to ensure that slavery and human trafficking is not taking place in any part of our business or supply chain:

- Relevant policies are reviewed and updated annually, with all colleagues being made aware of existing policies and any changes.
- All colleagues are required to complete annual training on the Code of Conduct.
- Concerns raised through our Integrity Line are monitored and investigated and any substantiated concerns are addressed appropriately. No incidents of modern slavery or human trafficking were identified within our business or supply chain during the previous year.

Continuous Improvement

We will continue to enhance our approach to modern slavery, including strengthening our supplier due diligence and reviewing the effectiveness of our measures on an ongoing basis.

This statement is in particular made pursuant to section 54 of the Modern Slavery Act 2015. It was approved by the Board of Directors of Zühlke Technology Group Ltd. on 8th January 2026

Zühlke Technology Group Ltd.



Philipp Sutter, Chairman