

# Modern Slavery Act Statement

## Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that EQS has taken and is continuing to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

We are committed to act ethically and with integrity and transparency in all business areas and to put effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## Our organization and business

EQS is a leading international cloud provider in the areas of corporate compliance, investor relations, data privacy and sustainability management. Thousands of companies across the world use EQS's products to build trust by reliably and securely meeting complex regulatory requirements, minimising risks and transparently reporting on business performance and its impact on society and the environment.

EQS has several subsidiaries all around the world. One of them is in the United Kingdom, EQS Group Ltd.

## Our policies

Our policies in relation to slavery and human trafficking are reviewed yearly and updated regularly. We use our own EQS product "Policies" (as part of the EQS Compliance COCKPIT) to roll out our Company Policies. This way, we ensure that all employees have read and understood the content of these policies and are aware of them, in order to integrate them in their daily work life.

The commitment to respect human rights and all associated values is an integral part of the EQS corporate culture. We have various internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

### **1. Code of Conduct**

The **Code of Conduct** is the core of our policies within the Compliance Management System. Its content displays the corporate values and working principles of EQS and is mandatory for all at EQS - employees, managers, and the Management Board.

The **Code of Conduct** forms the basis of all internal regulations within the company and gives everyone orientation in this respect. It describes what EQS expects from its employees and what everyone is obliged to do. It also serves as a compass for navigating successfully through ethical challenges. The **Code of Conduct** is based on international and general accepted agreements on human rights and the fight against corruption as well as legal regulations. It lays the groundwork for how members of EQS engage with various stakeholders such as clients, investors, suppliers, regulators and, most important, with each other.

In our **Codes of Conduct**, we expressly distance ourselves from exploitative labour practices such as child, forced or compulsory labour. This also includes deception about working conditions, recruitment fees and the withholding or any other form of refusal of passports or other identity documents. We reject these practices without exception and expect our suppliers, consultants and other contractors to have an equally clear stance. This is emphasized by our commitment to the ten principles of the United Nations Global Compact. A yearly Code of Conduct training takes place, which is compulsory for all our employees. The training actively addresses the issue of human rights. Furthermore, all new employees are informed about the human rights topics of our **Code of Conduct** as part of their onboarding sessions.

## **2. Business Partner Code of Conduct**

The **Business Partner Code of Conduct** sets out the fundamental principles, rules and rights by which EQS expects all of EQS' Business Partners to comply with. Our Business Partners are expected to uphold these standards in day-to-day activities, comply with all applicable policies and procedures, and ensure that all their employees, agents and downstream suppliers are aware of, understand and adhere to these standards.

Our **Business Partner Code of Conduct** contains globally relevant anti-slavery principles. Business Partners are prohibited to conduct unscrupulous labour practices such as these have been called, "modern-day slavery," including deceiving workers over conditions of employment, charging employees unreasonable recruitment fees and confiscating or otherwise denying access to identity documents such as passports and travel passes. EQS prohibits these practices and expects its Business Partner to do the same. Especially Business Partners shall not employ workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ workers under the age of 14.

## **3. Whistleblower Policy**

The EQS' **Whistleblowing Policy** ensures that any person, internally or externally, reporting concerns under this policy has a lawful right to raise those concerns without fear of harassment, discrimination or retaliation. As a result, EQS strictly prohibits any discrimination, retaliation or harassment against any person who reports conduct in violation of legal duties or policies based on the person's reasonable belief that such misconduct occurred. The prohibited forms of intimidation or retaliation include, but are not limited to, termination, demotion, suspension, threats, harassment, or any other manner of discrimination with respect to an employee's terms or conditions of employment. EQS also

strictly prohibits any discrimination, retaliation or harassment against any person who participates in an investigation of such complaints.

#### **4. Policy Management**

All these policies are reviewed annually and updated regularly. We use our own Tool "Policies" (as part of the EQS Compliance COCKPIT) to roll out Policies. This way, we ensure that all employees have read and understood the content of these policies and are aware of them in order to integrate them in their daily work life.

#### **Reporting**

EQS is committed to be a leader in business ethics and regulatory compliance, while maintaining an atmosphere of transparency and trust between employees and management. EQS is providing a company culture of Speak-Up and Listen-Up for its employees. For those reasons, EQS maintains a workplace where employees who reasonably believe that they are aware of conduct in violation of legal duties or policies can raise those concerns free of any harassment, discrimination, or retaliation.

EQS's employees as well as third parties can anonymously report grievances through the internal whistleblowing system, [EQS Ethics Line](#). [EQS Ethics Line](#) is accessible not only to all employees, but also for external parties.

Business Partners are expected to immediately report any (potential) compliance violation or violation of this Code via [EQS Ethics Line](#), that allows anonymous reporting. EQS will take appropriate action against any Business Partner whose actions are found to violate applicable law or the EQS' Business Partner Code of Conduct. Actions may include immediate termination of the business relationship by EQS at EQS's sole discretion.

#### **Our suppliers**

According to the UN Global Compact, the "supply chain can make a significant impact in promoting human rights, fair labour practices, environmental progress and anti-corruption policies".

The risk of human rights violations for EQS as a software-as-a-service company exists primarily in our supply chain, which is why we want to minimise these and other compliance risks through appropriate measures and framework conditions.

We carry out a supply chain risk management for all new and existing key suppliers, which enables us to identify potential risks and take appropriate measures to minimise them.

The basic framework conditions for cooperation with suppliers are set out both in the Code of Conduct for EQS employees and in the [Business Partner Code of Conduct](#) for Business Partners regarding our value chain. The Purchasing Policy contains detailed requirements for the implementation of the guidelines by EQS employees of EQS subsidiaries worldwide. In contractual relationships in which they are applied, the EQS Purchasing Terms further define the suppliers' obligations to EQS.

We ensure transparency and awareness of supply chain risks via this three-step process:

- Definition of sustainability risks and categories;
- Identification of the relevant suppliers;
- Development and implementation of necessary measures to cover risks, e.g. audits and trainings.

To support us in this process, we introduced the EQS product “Third Parties” internally in 2023. Supported by this tool we carry out a Risk Assessment for all major new and existing suppliers, which enables us to identify potential risks and take appropriate measures to minimise them.

We aim to analyse the risks of the most relevant services and products we purchase as a company. Aspects such as influence on the supply chain, probability of occurrence and potential damage are to be included in the analysis in order to obtain an assessment of the potential risk in relation to social, environmental and human rights and further relevant compliance obligations.

Based on the results of the Risk Assessment, we carry out individual audits of our key suppliers where necessary. This helps us to ensure adherence to our sustainability standards and compliance requirements in a targeted manner and to identify potential for improvement.

The following measures are examples and can be taken by EQS if necessary:

- Training and education: we emphasise the training and further education of our employees and purchasers, as well as our suppliers. Through regular training, we can raise awareness of the importance of our sustainability standards and compliance requirements and ensure that they are adhered to.
- Special contractual clauses; agreement of audit rights
- Request for certifications and evidence
- Individual audits of our key suppliers where necessary
- Escalation procedure
- Termination of the business relationship

### **Further information**

EQS publishes an annual Sustainability Report, which provides transparency on our progress with regards to human rights activities. The report contains e.g. our commitment to human rights, main results of our Supplier Risk Assessment and information on our continuous improvement measures.

Munich, 4<sup>th</sup> of June 2025

Location, Date



Achim Weik, Director of EQS Group Ltd.