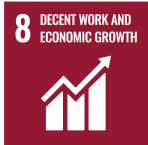




MODERN SLAVERY POLICY



Our position

At Device Europe, we apply a zero tolerance approach to all forms of modern slavery and human trafficking. We are committed to conducting our operations ethically, fairly, and transparently — both within our organization and across our entire supply chain.

The purpose of this Policy is to outline the actions we take to prevent the occurrence of slavery related practices within our company and to reduce the risk of such practices appearing in relationships with our business partners and suppliers.

Definition of modern slavery

Modern slavery is a general term referring to all forms of forced labor, exploitation, or bondage where a person cannot freely leave their place of employment due to threats, violence, deception, abuse of power, or other forms of coercion. It includes, in particular:

- forced labor — performed under the threat of penalty and without voluntary consent,
- human trafficking — recruitment, transportation, transfer, or receipt of persons for the purpose of exploitation,
- debt bondage — a situation where a person is forced to work to repay a debt they are unable to settle,
- forced marriage — entered into without the consent of one or both parties,
- child labor — especially in conditions that endanger the health, safety, or development of the child.

Our commitments

We are committed to implementing effective systems and control mechanisms to protect against all forms of modern slavery and human trafficking.

Due diligence

To fulfill our commitments, we undertake the following actions:

- provide employees with training and guidance on recognizing signs of modern slavery and how to respond,
- regularly remind staff of our obligations under the Modern Slavery Act 2015,
- design recruitment processes that eliminate the risk of modern slavery,
- take immediate action when a concern or irregularity is reported or discovered,
- provide all employees with a clear and understandable Whistleblowing Policy,
- regularly review our processes and implement appropriate corrective actions.

Identifying and mitigating risk

To reduce the risk of modern slavery in our supply chain, we apply the following measures:

- require suppliers to comply with all applicable laws, including those under the Modern Slavery Act,
- expect suppliers to implement internal procedures to prevent child labor, modern slavery, and human trafficking — and to pass these standards on to their subcontractors,
- continuously monitor the credibility of current suppliers and partners, taking follow-up actions when necessary,
- require suppliers to inform us of any known or suspected cases of modern slavery in their supply chain,
- reserve the right to terminate contracts at any time if cases of modern slavery or human trafficking are discovered.

Reporting irregularities

Each of us is obliged to immediately report any suspicions or known cases of modern slavery.

Reports can be submitted:

- directly to a supervisor,
- to the Social Responsibility Representative,
- via email to: compliance@deviceeurope.com

