



INNOMOTICS

Financial Year Ended 30th September 2024

Innomotics

Modern Slavery Act Statement

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1 Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Innomotics has taken and is continuing to take 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.

Until 30 September 2024, Innomotics was part of the Siemens Group, strictly complying with the ethical principles and obligations established in compliance with the main risks related to the supply chain. Innomotics' commitment remains unchanged, developing its own policies and controls to ensure continuity of existing key controls to avoid modern slavery risks. This report discusses the controls implemented by Innomotics which are equivalent and identical to those in place during the period under Siemens.

Sustainable value creation is the path we choose to achieve our goal of profit-driven, long-term growth. We create added value for the societies, in which we operate. At the same time, our business activities- both directly and indirectly - impact the lives of many. Innomotics is aware of its responsibility for ensuring the respect of human rights. For us, this responsibility is a core element of responsible business conduct. Building on our Business Conduct Guidelines, we have defined the respect of human rights in additional guidelines and principles.

Sustainable practices are firmly anchored in our corporate culture, based on our company values of being responsible, excellent and innovative. We apply globally binding principles that require all employees and managers to behave in an ethical, law-abiding manner. We act responsibly to support economic, environmental and social progress.

Innomotics has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

2 Our high-risk areas

Compliance risk management is an ongoing focus in all aspects of business activity. Global risks are assessed with risk topics subsequently cascaded throughout the organisation to ensure proper management focus.

Several industries are particularly affected by human rights risks due to the nature of their operations and supply chains. Some of the most impacted sectors are the Extractive Industries (Mining, Oil, and Gas); these industries often operate in remote areas with weak governance, leading to risks such as forced displacement, poor working conditions, and environmental degradation.

Human Rights risk has been incorporated as a focus topic and is firmly embedded in our due diligence process for relevant major projects. In addition, businesses are assisted in managing environmental, social (human rights including modern slavery) and governance (ESG) risks across the entire value chain.

3 Our policies

We have various internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

3.1 Business Conduct Guidelines

At Innomotics, we are committed to upholding the highest standards of integrity and ethical conduct in all our business dealings. Our success is built on a foundation of trust, transparency, and compliance with both internal regulations and legal requirements.

The Business Conduct Guidelines (BCG) are our corporate code of conduct and are at the heart of our global Compliance System. Its contents are built from our values and are mandatory for all at Innomotics - employees, managers, and the Managing Directors. They are not just rules but a reflection of our core values: innovation, responsibility, and excellence.

Until 30 September 2024, Innomotics has followed the principles reflected in the Siemens Business Conduct Guidelines. It issued its own on 1 October 2024.

The BCG set out the fundamental principles, rules and rights governing how we treat each other within Innomotics, how we treat our external business partners and how we as a company act towards the society and the environment:

- We are honest and truthful in our dealings
- We respect the dignity, privacy and inherent rights of individuals
- We protect the health, occupational safety, and personal security of our people
- We engage with reputable and law-abiding partners
- We act in line with our responsibility for the environment
- We explore ethical concerns

All at Innomotics commit to respect the personal dignity, and personal rights of every individual, as well as to act always ethically, legally, and with the highest integrity - wherever we do business.

The Innomotics BCGs were published in October 2024 respecting our company's heritage and history, while emphasising Innomotics' own principles. Consistent consideration of ethical principles is expected in our decisions, even in difficult situations.

Our BCG require that our employees recognise and apply globally relevant anti-slavery principles specifically including the International Labour Organisation's Tripartite Declaration of Principles, and its Declaration on Fundamental Principles and Rights at Work, with respect to the elimination of child labour, abolition of forced labour, prohibition of discrimination, and rights to freedom of association and collective bargaining.

Each employee is required to sign a statement that they have read and understood the Business Conduct Guidelines as part of our recruitment process.

Innomotics also expects its suppliers and business partners to share Innomotics' values and comply with all applicable laws.

More information is available here:

<https://www.innomotics.com/hub/en/company/collaborating-with-innomotics>

3.2 Compliance policy

This policy, in the form of a globally binding all-encompassing compliance circular, sets out the organisation's stance on Anti-Corruption, Anti-Trust, Anti Money Laundering, Data Protection and Human Rights.

Until 30 September 2024, Innomotics has followed the principles reflected in the Siemens Compliance Policy. It issued its own Global Compliance Circular on 1 October 2024.

The Innomotics Compliance System is based on three pillars: Prevent, Detect, and Respond.

Preventative measures include policies, procedures, risk management, training, communication, Collective Action, and advice and support. Detective measures include complaint and reporting procedures, investigations, audits and reviews and continuous monitoring spot checks. Responsive measures include remedial and disciplinary action, root cause analyses, and applying lessons-learned through process modification.

The circular specifically highlights the need to comply with local law and thereby the requirements of the Modern Slavery Act, but Innomotics is committed, in accordance with its corporate responsibility, to respect human rights to an extent which goes beyond compliance with applicable laws and other external regulations. In addition to the fundamental principles and rules of our Business Conduct Guidelines, the following applies:

- Every employee must avoid causing or directly or indirectly contributing to the violation of human rights.
- Every employee must seek to prevent or mitigate adverse human rights impacts that are directly linked to the business activities of Innomotics by the company's business relationships, even if Innomotics has not caused or contributed to those impacts.
- For projects with heightened potential of human rights violations a Human Rights Due Diligence must be performed in project sales phase as part of the Compliance Risk Evaluation.

- The subject of Human Rights is a mandatory topic in risk assessment deep dives.
- Potential Human Rights violations are subject to investigation as part of the formal compliance case handling process.
- Training modules incorporate key aspects of Human Rights compliance.

3.3 Whistleblower Policy

Our policy encourages colleagues and business partners to report ethical concerns directly or through a whistleblower channel managed by a third party. It includes specific reference to ethical concerns relating to illegal and inhumane labour practices, such as slavery and human trafficking.

Until 30 September 2024, Innomotics has used the Siemens whistleblower channel “Tell Us”. It implemented its own “INtegrity Channel” on 1 October 2024.

Innomotics has implemented a compliance whistleblower hotline for reporting compliance violations in a secure manner, 24 hours a day, 7 days a week, in 11 languages, online or via telephone. Reports can also be made anonymously. The hotline can be used by employees and management as well as customers, suppliers and other stakeholders. It is provided by a third-party supplier and all data supplied is maintained on secure servers in Europe and handled exclusively by Innomotics.

Innomotics internal whistleblowers are protected by special regulations that protect whistleblowers who make good faith reports to the best of their knowledge.

More information is available here:

<https://www.innomotics.com/hub/en/company/whistleblowing>

3.4 Supply Chain Due Diligence Policy

In implementing its human rights and environmental due diligence, Innomotics is subject to the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG). Among other things, the LkSG requires pursuant to Section 6 para. 2 LkSG, the publication of a policy statement outlining the company's strategy for the protection of human rights and the fulfilment of its environment-related obligations. Key elements of this policy statement include a description of the procedures Innomotics uses to fulfil its legal obligations and a description of the human rights and environment-related risks and expectations for our employees and suppliers identified on the basis of an annual risk analysis.

Until 30 September 2024, Innomotics has followed the principles reflected in the Siemens Supply Chain Due Diligence Policy. It issued its own on 1 October 2024.

More information is available here:

<https://www.innomotics.com/hub/en/company/supply-chain-due-diligence-act>

3.5 Recruitment Policy

The company operates a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. In addition, policies provide freedom for workers to terminate employment, freedom of movement and freedom of association. Furthermore, threats of violence, harassment and intimidation are specifically forbidden as is discrimination.

4 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".

Innomotics globally has a substantial and complex supply chain. With our large and geographically dispersed supplier network, Innomotics

ensures a higher priority is given to those Suppliers deemed as high risk and has implemented a system of interconnected processes and tools to stay on top of this complexity under the governance of our Global Services Supply Chain Management (SCM) function. Transparency and awareness of supply chain risks is ensured via a three-step process:

- Definition of sustainability risks and categories;
- Identification of the relevant suppliers;
- Development and implementation of necessary procurement processes to cover these risks for example by conducting on-site audits.

We support all our suppliers through our “Code of Conduct for Innomotics Suppliers and Third-Party Intermediaries”, and the basis of all our supplier relationships is the commitment of our suppliers to observe the principles of this code. In addition, we explicitly encourage them to extend these values further into their own supply chain to create a network of interactions and business relations that are built on trust. As well as reflecting our Business Conduct Guidelines, our supplier code is based on the UN Global Compact and principles of the International Labour Organisation.

Until 30 September 2024, Innomotics has followed the principles reflected in the Siemens Code of Conduct for Suppliers and Third-Party Intermediaries. It issued its own on 1 October 2024.

The code specifically prohibits the use of forced labour and child labour by our suppliers, requires our suppliers to respect the employment rights of their workers and requires our suppliers to use reasonable efforts to promote compliance with the code amongst their own.

Suppliers commit to the code by signing the Corporate Responsibility contract clause as part of the onboarding and qualification process, and also for all new and extended procurement contracts, via the Corporate Responsibility declaration or by acknowledging the Conditions of Purchase.

Prior to selection all suppliers undergo various due diligence checks including a Corporate Responsibility Self-Assessment (CRSA) for the high-risk ones. This questionnaire enables suppliers to assess whether they meet the requirements of our Code of Conduct. This process

raises awareness of these requirements, identifies potential risks in connection with sustainability at an early stage, and ensures that appropriate steps are taken.

Following selection, suppliers are continually monitored, and risk assessed, particularly those operating in higher risk countries. Suppliers for whom certain potential sustainability risks have been identified or where there are suspicions of non-compliance with the code of conduct are subjected to an in-depth assessment by audit experts on site. To ensure independent reporting, this assessment is carried out by external service providers.

Consequences of non-adherence


If our sustainability self-assessments or audits reveal infringements of our requirements, they must be remedied by the suppliers in question within a reasonable period of time. Besides follow-up audits carried out by our external audit partners, the responsible procurement units and the suppliers involved directly agree on the corrective actions defined during our audits. We reserve the right to end the supplier relationship in the event of serious infringements, such as evidence of slavery, servitude, human trafficking and forced labour.

5 Our commitment

Innomotics will not tolerate any violations of applicable law - and if it does happen, we will take strong action. We will continue to apply a zero-tolerance approach to forced labour, slavery and human trafficking in any form, in our business and supply chain.


6 Approval for this statement

This statement was approved by the Innomotics UK Managing Directors with respect to the Financial Year ending on 30th September 2024.



Digitally signed by Powles, Chris
DN: cn=Chris Powles, o=INNOMOTICS, email=chris.powles@innomotics.com
I agree to the terms defined by the
statement of my signature on this document
Date: 2025.03.26 10:24

Powles, Chris
CEO Innomotics UK



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I agree to the terms defined by the
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