

Declaration on modern slavery and human trafficking

1. Preamble

This declaration outlines measures that the ABATEC Group has taken and will take in the future to prevent modern slavery and human trafficking within the ABATEC Group and its value chain.

Furthermore, due to the high legal standards in Austria and other states of the European Union regarding workers' rights, the risk of modern slavery and human trafficking is low. Nevertheless, the ABATEC Group is heavily dependent on suppliers abroad.

Considering these international business connections and the increasingly complex value creation and supply chains, we are aware of our global responsibility to uphold human rights. Global compliance with sustainability standards, particularly in the areas of human rights (especially concerning child labor and forced labor, as well as labor rights), occupational safety and health protection, environmental protection, and anti-corruption, is a fundamental requirement for successful business operations. We regularly and thoroughly address all relevant risks arising from these topics and manage potential impacts. This is based on a complex risk analysis at the level of the countries in which we operate.

Only together with our strategic partners, regular suppliers, and other business partners can we ensure compliance with sustainability standards and contribute to the achievement of the United Nations Sustainable Development Goals (SDGs).

2. Declaration on respect for human rights

People who work directly or indirectly for the ABATEC Group are entitled to have their human rights within the meaning of the UN Universal Declaration of Human Rights observed, and to be treated with fairness and respect. The ABATEC Group expects its board members, managers and employees to respect human rights and to protect them in their everyday activities. As human rights risks can inherently arise from collaboration with partners along the value chain, we also require our business partners to respect human rights in our Code of Conduct.

The ABATEC Group pays attention to ensuring that all employees are treated fairly and respectfully. The aim is to create a working environment characterized by mutual trust in which each individual is treated with dignity and respect, and in which people from diverse cultures and with different personal backgrounds are respected and employees feel comfortable. As an

international Group, we value the diversity that is reflected in the origin, culture, language, and ideas of our employees. We therefore do not tolerate any discriminatory behavior towards employees, business partners, suppliers, customers and advisors, nor do we tolerate any form of sexual harassment.

3. Internal measures

3.1. Code of Conduct

In 2024, the ABATEC Group revised its Code of Conduct, which defines the ethical principles, general guidelines, and minimum standards of the company. The establishment of new contractual relationships within the ABATEC Group is carried out as a matter of course with reference to the Code of Conduct, whose fundamental principles represent non-negotiable minimum standards.

The Code of Conduct is permanently online available to all employees on the intranet and to third parties on the company website. During the course of their onboarding program new employees are trained on the Code of Conduct. Further, the ABATEC Group offers tailored trainings to promote awareness of compliance matters.

3.2. Whistleblower system

Every employee can report possible rule violations, such as breaches of human rights or suspicions of such violations, to the designated compliance contact point via email. When dealing with and investigating suspicious cases, the principle of objective clarification as well as strict confidentiality and secrecy applies. If a suspicious case is confirmed, the ABATEC Group will take appropriate measures depending on the severity and relevance of the rule violation. All reports are treated as strictly confidential. All information is examined and, if a suspicious case is confirmed, appropriate measures are taken to remedy and eliminate possible grievances. Whistleblowers do not need to fear any sanctions from the ABATEC Group from a report of a suspicious case which is submitted to the best of their knowledge and belief, and absolutely no discrimination against whistleblowers will be tolerated.

4. Measures in the supply chain

4.1. Sustainability Assessment

To make the supply chain more sustainable, an approach has been developed with corresponding measures to identify potential human rights risks and their impacts.

4.2. Demands placed on contractual partners regarding sustainability

The Code of Conduct is integrated into all new contracts. Every contractual partner seeking to engage in business with the ABATEC Group is required to acknowledge and adhere to the ethical principles and values, expected behavior and responsibilities of individuals as well as minimum common standards defined in the Code of Conduct.

The ABATEC Group takes the following steps to enforce compliance with human rights:

- 4.2.1. **Prevention:** The Purchasing Terms of the ABATEC Group refer to the Code of Conduct which is available on the ABATEC Website. The adherence to human rights is therefore part of our terms and conditions and our contractual partners have to adhere to it.
- 4.2.2. **Investigation:** Upon receiving reports of alleged human rights violations or breaches of the Code of Conduct through tips, media coverage, or other means, the ABATEC Group promptly initiates investigations.
- 4.2.3. **Response:** Upon internal verification of human rights violations or other breaches of the Code of Conduct, the ABATEC Group takes appropriate actions. The primary objective is to rectify and prevent violations while actively enhancing the sustainability practices of business partners. In severe cases or instances of non-compliance, the ABATEC Group retains the right to terminate existing business relationships and suspend future project assignments.