

# **Modern Slavery Statement**

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out KISTERS' commitment to prevent modern slavery and human trafficking in its business and supply chains.

## Organisation's structure, business and supply chain

KISTERS AG, headquartered in Aachen, Germany, is the parent company of the KISTERS Group with subsidiaries in the U.S.A, China, Australia, New Zealand, the Netherlands, France, the UK, Spain, Switzerland, Austria, and Germany. KISTERS, with more than 500 employees, is specialised in developing software for the sustainable management of energy, water and air re-sources, environmental protection and safety, logistics, monitoring and 3D viewing, as well as in civil engineering services.

#### Policies in relation to slavery and human trafficking

KISTERS Group is strongly committed to ensuring that its operations and supply chains are free of modern slavery and human trafficking. KISTERS Group has implemented a set of guidelines and rules, which are applicable within the entire KISTERS Group. This Code of Conduct lays down a set of corporate rules for business conduct which each and every employee subscribes to when hired. This applies to members of the supervisory board, managing directors of the individual group companies, employees and individuals whose status is equivalent to that of employees (e.g. temporary workers, consultants).

Foreign group companies must ensure compliance with national laws in the implementation of this Code of Conduct. Violations may result in industrial and disciplinary sanctions.

Our working practices respect and uphold all human rights, and we provide opportunities to our employees for further development by way of training and development programmes. KISTERS is a member of the Fair Company Initiative for fair working conditions in the workplace. This means that KISTERS voluntarily commits to ensuring fair working conditions for every employee.

We expect our partners, suppliers and sub-contractors to behave in the same manner, ensuring no modern slavery, servitude, forced and compulsory labour or human trafficking takes place within their business or their own supply chain including both adults and children being forced to work against their free will.

#### Commitment

National and international legal frameworks regulate all business activities of the KISTERS Group. We respect the cultures and ethical values of all countries in which the KISTERS Group operates. KISTERS AG undertakes to fully comply with the requirements of German and European laws and guidelines.

In order to guarantee this permanently, a cadastral register has been established. The cadastral register comprises international (European) and national (federal and state level) laws and guide-lines. It is maintained and updated annually or as required by those responsible. KISTERS Group is committed to provide competent and responsible company management (e.g. German Corporate Governance Codex, Sarbanes-Oxley Act). Our social standards are based on the values of Global Compact and internationally recognized norms, guidelines and standards as provided by the International Labour Organization (ILO) and the OECD as stated in the KISTERS Code of Conduct.

Full support is expected of all KISTERS Group employees in this matter, as well as their independent compliance with all its principles within the scope of their own area of responsibility.

All our suppliers and subcontractors are required to commit to the KISTERS Code of Conduct, to demonstrate their policy and approach to the provisions of the Modern Slavery Act, and to set out in detail what they are doing to ensure that they, and in turn their supply chain, are able to demonstrate compliance with the 2015 Act. Furthermore, our suppliers are obliged to prove their conformity to occupational health and safety as well as information security standards in a self-disclosure. Awareness of the provisions of the Modern Slavery Act is communicated to the company's senior management through management review and internal communication up-dates.

# Responsibility

Responsibility for KISTERS' anti-slavery initiatives is as follows:

- Policies: The KISTERS management board is responsible for putting the policies in place. The Quality manager is responsible for reviewing at management review.
- Investigations/Due Diligence: The KISTERS management board is responsible for undertaking any investigations and due diligence in relation to known or suspected instances of slavery and human trafficking within the business.
- Whistle Blowing: If any of our employees have concerns, they are expected to report them to their Line Manager. Senior Management is expected to act upon them.
- Salary: the KISTERS management board is responsible for ensuring appropriate salaries and at least the statutory national minimum wage in all companies in the KISTERS Group.

## **Supplier Adherence to Allied Values**

We have zero tolerance of slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

Aachen, 15<sup>th</sup> of August 2023

Klaus Kisters CEO Hanns Kisters COO