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## SOS electronic Group Anti-Slavery and Human Trafficking Policy

**SOS electronic s.r.o.**

Pri pracháni 16, 040 11 Košice

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1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

1.2 We have a zero-tolerance approach to modern slavery and we are committed to acting ethically, transparently and with integrity in all of our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.3 This policy applies to our third party supply chain, and to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## 2. RESPONSIBILITY FOR THE POLICY

2.1 The company Management has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Group's existing structure of risk management provides the framework to support the Group's compliance with the requirements of the Act, primarily through oversight and assurance from the Risk and Compliance Committee (the RCC) concerning the processes in place for implementing this policy, monitoring its use and effectiveness, ensuring that managers and employees receive adequate training, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. Managers will remain alert to indicators of modern slavery and will respond appropriately if they find or are informed of any indication of modern slavery.

1 The definitions of these terms are as follows. Slavery: exercising powers of ownership over a person. Servitude: the obligation to provide services is imposed by the use of coercion. Forced or compulsory labour: work or services

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Bankové spojenie UniCredit Bank Czech Republic and Slovakia, a.s., pobočka zahraničnej banky

EUR SK091111000000105020008 USD SK651111000000105020067 Swift Code UNCRSKBX

Zápis v obchodnom registri Okresného súdu Košice I., oddiel: Sro, vložka 5791/V

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are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily. Human trafficking: Arranging or facilitating the travel of another person with a view to their exploitation.

### 3. RISKS

3.1 The principal areas in which SOS electronic faces risks related to modern slavery include:

the SOS electronic Supply Chain and outsourced activities and in particular those Suppliers located in overseas jurisdictions identified through our human development risk index management tool as higher risk, in accordance with the principles set out by Transparency International, the Global coalition against corruption; recruitment in our own business, particularly recruitment through agencies;

### 4. COMPLIANCE WITH THE POLICY

4.1 You must ensure that you read, understand and comply with this policy.

4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim. This list is not exhaustive:

the person is not in possession of their own passport, identification, travel documents or bank account;

the person is acting as though they are being ins



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