



## **Witt Modern Slavery Policy**

Witt Invest and subsidiaries (hereinafter referred to as “Witt”) is committed to upholding the highest standards of ethical conduct and integrity in all aspects of its business operations, including the prevention of modern slavery and human trafficking. We recognize our responsibility to ensure that slavery and human trafficking do not occur within our business or supply chains.

### **Scope**

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and constitutes the Modern Slavery Act Transparency Statement for Witt UK Limited. Whilst this statement primarily relates to our UK business, our approach to modern slavery and human trafficking is consistent across all Witt entities.

### **Our Supply Chains**

Witt's manufacturing strategy involves outsourcing certain non-core functions to third-party entities with expertise in manufacturing. This allows us to focus our resources on innovation and product development. We maintain close relationships with our suppliers to ensure that they adhere to our standards and policies.

### **Policies on Slavery and Human Trafficking**

Witt is committed to complying with all relevant laws and regulations pertaining to slavery and human trafficking in the countries where we operate. We expect our business partners to also comply with applicable laws and uphold internationally recognized minimum social and labor standards, as outlined by the International Labour Organization. We reject any form of human rights violations, including child labor, forced labor, discrimination, harassment, and human trafficking.

### **Relevant Policies and Training**

We have established policies and procedures to prevent slavery and human trafficking within our business and supply chains. These policies are outlined in our Code of Conduct, which is communicated to all employees and suppliers.

### **Supplier Adherence to Our Values**

Witt recognises the possibility of actual adverse impacts, even when the best policies and processes are in place.

If a supplier discovers or is informed that it causes or contributes to an actual adverse impact on human rights including labour rights, environmental, and anti-corruption principles the supplier shall enable access to remedy for those affected or inform the proper authorities.



If the supplier did not cause or contribute to such adverse impact, but is directly linked to it as it occurs in the supplier's value chain or in other relations, the supplier commits to use its leverage to make the causing or contributing entity prevent reoccurrence, mitigate the situation, and enable access to effective remedy for those affected or ensure that the proper authorities are informed.

Suppliers have an explicit responsibility to provide remedy to victims of actual adverse human rights impacts that they cause or contribute to. Therefore, if such actual adverse human rights impacts are identified, Witt expects suppliers to provide for or cooperate in their remediation through legitimate processes.

The aim of this Code is not to cease the business relationship between Witt and suppliers if non-compliance were to be identified, but to help suppliers improve their management of adverse impacts continuously. Witt is therefore willing to work with suppliers to achieve compliance with the provisions of this policy. However, Witt will not conduct business with a supplier if compliance with the terms of this policy is deemed impossible and the supplier shows no willingness or ability to mitigate identified adverse impacts.

#### **Continuous Review**

Witt is committed to continuously monitoring and improving our efforts to combat slavery and human trafficking. We conduct review of our policies, procedures, and effectiveness in addressing these issues, with the aim of enhancing our practices and ensuring ongoing compliance.

All employees, partners and suppliers can report breaches of this Policy, which can be done in confidence, to our Whistleblower platform on <https://witt.indberet.nu/>.

This Modern Slavery Policy reflects our unwavering commitment to upholding human rights and ethical principles in all aspects of our business operations.

A handwritten signature in black ink, appearing to read 'A. Witt' with a long horizontal stroke extending to the right.

Allan Witt – Founder and CEO