

Modern Slavery and Human Trafficking Statement

June 2026

Aricoma Group ("**Aricoma**", "**we**", "**our**", or "**the Group**") is committed to ensuring that modern slavery, human trafficking, forced labour, and other forms of exploitation have no place in our business operations or supply chains.

This statement is made pursuant to Section 54 of the *UK Modern Slavery Act 2015* and sets out the actions taken by Aricoma to prevent modern slavery and human trafficking within our organization and across our global operations during the financial year ending 2026.

We uphold the highest ethical standards and respect for human rights, as reflected in our Code of Conduct, Compliance Policy, and Supplier Standards.

1. **Our Structure and Business**

Aricoma is a leading European IT and digital transformation provider delivering enterprise technology solutions, cloud and infrastructure services, cybersecurity, software development, and consulting across both public and private sectors, including finance, healthcare, manufacturing, energy, telecommunications, and government.

The Aricoma Group operates through a network of specialized legal entities and regional delivery teams across Europe, with a strong presence in the Czech Republic and Slovakia, as well as branches in Belgium and Luxembourg, supporting customers through local expertise and international service capabilities.

Our corporate headquarters are located in Vinohradská 1511/230, 11000 Prague 10, Czech Republic, ID No.: 04615671. Certain entities within the Aricoma Group conduct business or provide services in the United Kingdom and may therefore fall within the scope of the Modern Slavery Act 2015.

2. **Our Commitment and Policies**

Aricoma maintains a zero-tolerance approach to any form of modern slavery or human trafficking.

We are guided by internationally recognized standards, including:

- the *Universal Declaration of Human Rights*,
- the *ILO Fundamental Conventions*, and
- the *UN Guiding Principles on Business and Human Rights*.

Our commitment is supported by the following internal policies and frameworks:

- **Code of Ethics & Compliance** – establishes principles of ethical behavior, integrity, and respect for human rights.
- **Supplier Code of Conduct** – requires all suppliers and contractors to comply with applicable labour laws, ensure fair working conditions, and prohibit forced or child labour.
- **Aricoma Group Compliance Policies** – which form the foundation of our compliance system and establish a unified framework for ethical business conduct across all Aricoma Group companies.

These policies establish a unified framework for ethical business conduct across all Aricoma Group companies and define clear principles relating to:

- Anti-Corruption and Bribery
- Anti-Money Laundering and Counter-Terrorist Financing
- Gifts and Hospitality
- Charitable and Political Donations
- Third Party Due Diligence and Supplier Relations
- Conflicts of Interest
- Compliance Reporting and Internal Investigations
- Cooperation with Public Authorities and Competitors
- Principles for Using Generative AI

Together, these policies ensure that Aricoma operates in accordance with international regulations, ethical business standards, and transparency requirements. They promote accountability, integrity and respect for human rights in all operations.

3. **Supply chain and risk management**

Aricoma's supply chain primarily comprises professional service providers, technology vendors, and recruitment partners supporting the delivery of IT consulting and software development services.

Although the overall risk of modern slavery in our sector is considered low, we recognize potential exposure in areas including:

- Use of subcontracted or temporary labour.
- Third-party service providers in higher-risk jurisdictions.
- Procurement of equipment and materials through complex global supply chains.

To mitigate these risks, Aricoma:

- Conducts supplier due diligence prior to engagement, including ethical and compliance assessments.

- Requires suppliers to comply with our Supplier Code of Conduct and relevant contractual clauses.
- Reserves the right to audit suppliers and terminate relationships in case of non-compliance.
- Periodically reviews and updates risk assessments across our supplier base.

4. **Due Diligence and Preventive Measures**

Aricoma maintains due diligence processes designed to identify, prevent, and mitigate potential modern slavery risks.

These measures include:

- Screening suppliers and business partners for ethical and legal compliance.
- Evaluating high-risk suppliers and applying enhanced review processes where necessary.
- Integrating anti-slavery commitments into our contractual terms and procurement procedures.
- Collaborating with HR and Procurement departments to identify and mitigate labour exploitation risks.

5. **Training and awareness**

Aricoma recognizes the importance of awareness and education in preventing modern slavery and human trafficking.

To support this commitment:

- Compliance and People teams provide annual training and periodical communication campaigns on ethical conduct, anti-slavery principles, and responsible procurement.
- All employees are encouraged to identify and report potential indicators of exploitation.
- New hires receive mandatory induction training on the Code of Conduct and our human rights commitments through Compliance.

6. **Monitoring, control and continuous improvement**

Aricoma continually evaluates the effectiveness of our actions to prevent modern slavery and human trafficking through:

- Regular reviews of internal policies and supplier due diligence processes.
- Monitoring compliance across our global operations.
- Updating training content and risk assessments based on new regulations or identified gaps.

We remain committed to strengthening our human rights framework and further expanding supplier engagement to promote transparency and ethical sourcing practices.

This statement has been approved by the Board of Directors of Aricoma Group and will be reviewed and updated annually as part of the Group's ongoing commitment to integrity, transparency, ethical business conduct, and compliance with applicable legal and regulatory requirements.