

## Modern Slavery Act Statement 2024

This statement is made by Hexatronic Group AB and its subsidiaries (collectively, "Hexatronic") pursuant to section 54 of the UK Modern Slavery Act 2015. It covers the financial year ending December 31, 2024, and outlines the steps that Hexatronic has taken to prevent modern slavery and human trafficking in its operations and supply chain.

Hexatronic Group AB provides this joint statement for itself and on behalf of its subsidiaries. Subsidiaries that are directly covered by a disclosure obligation include Hexatronic UK Ltd, PQMS Ltd, Smart Awards Ltd, Tech Optics Ltd, Mpirical Ltd, Impact Data Solutions Limited, and Fibron BX Limited.

### Organization structure, business, and supply chain

Hexatronic is mainly specialised in fiber optic communication, that delivers products and solutions for optical fiber networks, contributing to digitalization worldwide. Hexatronic's core areas are Fiber Solutions, Harsh Environment and Data Center. Hexatronic employs approximately 2,000 people and comprises 38 operating entities supported by the parent company Hexatronic Group AB, with its registered office in Gothenburg, Sweden. Key markets are North America, Germany, and United Kingdom.

Hexatronic develops and manufactures its own products and services, as well as sells and manufactures solutions based on products from leading manufacturers worldwide. Hexatronic purchases its components and services from suppliers across Europe, Asia, North America, and Oceania. Ensuring a sustainable supply chain is vital in the strategy to deliver value to customers and contribute to sustainable development. Hexatronic therefore, actively seeks to partner with suppliers who share its values regarding human rights and fair employment conditions. Customers include companies and public authorities within the telecom industry, such as telecom companies, communications and telecom operators, and network owners.

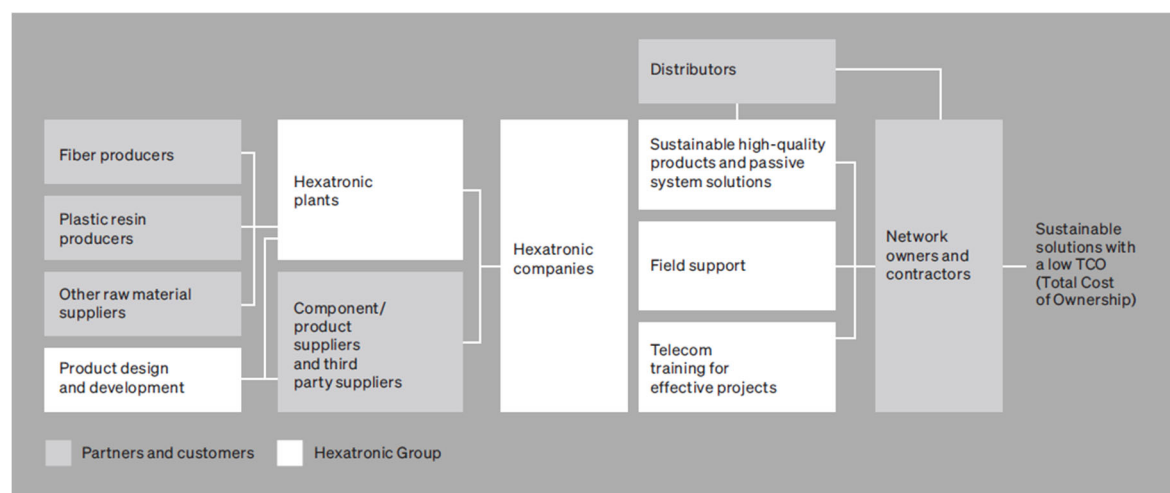


Figure 1 Hexatronic in the value chain

Hexatronic Group Sustainability Organization consists of cross functional action teams that support progress on prioritized sustainability areas, including preventing modern slavery, encourage collaboration, and enhance the actions and efforts to reach the targets defined in the [Sustainability Roadmap](#) to 2030.

## Policies and procedures

Hexatronic has a zero-tolerance approach to any form of modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships. There are several policies and procedures in place that reflect commitment to respect human rights and prevent modern slavery in operations and the supply chain:

- [The Sustainability Policy](#) applies to all Hexatronic Group companies and subsidiaries, and all employees. The policy confirms Hexatronic's commitment and adherence to internationally recognized standards and guidelines regarding human rights and business, in regard to its own operations and throughout its value chain.
- [The Code of Conduct](#) applies everywhere Hexatronic does business, and to everyone who works on Hexatronic's behalf. It sets out the ethical principles and standards of behavior and covers topics such as compliance with laws and regulations, business ethics, and respect for human rights. The Code of Conduct is regularly communicated to all employees through training programs. Employees and other stakeholders are urged to report any violations of our Code of Conduct directly to Hexatronic, or by using the [whistleblower function](#) on the website.
- [The Supplier Code of Conduct](#) sets out the minimum requirements that are expected from suppliers and subcontractors regarding social, environmental, and ethical issues, including human rights and the prohibition of modern slavery and human trafficking. The Supplier Code of Conduct is based on the UN Global Compact Principles and the International Labour Organization (ILO) conventions. According to the Supplier Code of Conduct, the supplier is required to conduct their own Human Rights Due Diligence assessment and follow the OECD Due Diligence Guidance. The Supplier Code of Conduct is included in supplier agreements.
- [The Whistleblowing Policy](#) provides a mechanism for employees and other stakeholders to report any concerns or suspicions of wrongdoing, including any breach of the Code of Conduct or Supplier Code of Conduct, without fear of retaliation. The Whistleblowing Policy is available on the website and is promoted through internal and external channels.
- The Trade Compliance Policy establishes standards to ensure that all business activities comply with relevant trade laws and regulations. This policy includes measures to prevent engagement with partners involved in unlawful activities, particularly those that may conflict with human rights and labor standards. It promotes ethical sourcing by emphasizing due diligence across all procurement and trade practices.

## **Due diligence controls, grievance mechanisms, risk assessment and management**

Hexatronic has integrated human rights aspects into its business and operations in accordance with OECD Guidelines for Multinational Enterprises and is an active participant in the UN Global Compact (UNGC). As part of Hexatronic's commitment to respect and uphold human rights, a Human Rights Due Diligence assessment has been conducted in accordance with the United Nations Guiding Principles on Business and Human Rights. The assessment involved identifying and prioritizing the potential and actual human rights impacts of Hexatronic's operations and value chain, assessing the effectiveness of existing policies and practices to prevent and mitigate these impacts, and developing action plans to address any gaps or risks.

Salient human rights issues and the risk of modern slavery and human trafficking are primarily linked to global supply chains. Hence, having a sustainable supply chain is a priority, and is a critical criterion when selecting new suppliers.

Hexatronic aims to work with suppliers that demonstrate adherence to human rights and fair employment standards and conditions. Supply chain risks are regularly assessed and suppliers are evaluated through surveys, audits, and assessments, to verify suppliers' compliance with the Supplier Code of Conduct and other relevant standards and regulations. The suppliers respond to questions related to human rights, decent work and fair employment conditions, anti-corruption, and supply chain management. The responses are supplemented with relevant documentation. In the evaluation phase, the suppliers are scored on each topic and can be asked to clarify and/or supplement the material further, or take corrective actions, to be approved. Feedback, guidance, and support is provided to suppliers to help them improve their performance and practices.

Suppliers are required to carry out due diligence activities to ensure they are operating responsibly, respecting human rights and decent working conditions. A key to progress in this area, is ensuring the purchasing organization has the right competencies.

Regular assessments of Hexatronic's own operations and sites are conducted to ensure adherence to policies and procedures and to identify areas for improvement.

## **Performance and progress**

During the financial year 2024, the following actions have been taken to prevent modern slavery and human trafficking in Hexatronic's operations and supply chain:

**Training and capacity building:** Training is continuously provided to employees and managers on the Code of Conduct, which is mandatory for all employees to complete. During 2024, 98% of employees completed the training. Procurement functions have received additional capacity-building on supply chain management, including on the topics of modern slavery and human trafficking.

**Policy update:** During 2024, Hexatronic updated its Sustainability Policy to enhance the commitment to respecting human rights and the dignity of all people. This includes to actively monitor and assess human rights practices across operations and value chains through a due diligence process in line with the OECD Guidelines. Furthermore, Hexatronic commits to collaborating with its extended suppliers to enable adequate wages to be earned throughout its supply chain. The Policy applies to all companies in Hexatronic Group and all employees.

**Risk tool development:** Hexatronic designed and implemented its own supply chain 'risk tool.' The tool is used to systematically evaluate the human rights risk levels in specific geographies and among specific suppliers. Five major global indices are incorporated, including the Sustainable Development Goals, Global/Workers Rights Index (labor rights and freedoms) and the Freedom in the World (political and civil liberties).

**Supplier requirement update:** Hexatronic maintains a robust Supplier Code of Conduct, explicitly prohibiting forced labor, child labor, and any form of discrimination or exploitation within the supply chain. It sets out clear expectations on working hours, wages, and freedom of association. During 2024, Hexatronic enhanced processes for assessing adherence to the Supplier Code of Conduct, including:

- Pre-qualification assessments to evaluate potential suppliers' sustainability performance before onboarding.
- Self-assessment questionnaires for existing suppliers to report on their practices related to human rights and working conditions.
- Audits to verify compliance with the Supplier Code of Conduct and broader expectations.

**Supply chain engagement:** During 2024, Hexatronic conducted fifteen supplier sustainability audits, which included questions linked to modern slavery and supply chain due diligence. Hexatronic is using a risk-based approach and continues to increase the share of spend from suppliers that have been sustainability approved (scoring 70% or higher on assessments). During 2024, 43% of spend on direct material providers was related to suppliers who were sustainability assessed and approved. These suppliers have proven their compliance to human rights, anti-corruption, supply chain management, environment, fair employment conditions, and working environment.

Hexatronic acknowledges that the fight against modern slavery and human trafficking is an ongoing process that requires constant attention and improvement. Hexatronic is committed to embedding due diligence processes within the organization, reviewing and updating policies and practices regularly, and to reporting on actions and achievements annually. Feedback or suggestions from stakeholders on how to further strengthen efforts in this area is welcome.

## Approval and signature

This statement has been approved by the Board of Directors of Hexatronic Group AB and signed by Rickard Fröberg, Chief Executive Officer of Hexatronic Group AB, on behalf of Hexatronic.

A handwritten signature in blue ink, appearing to read "R. Fröberg", written in a cursive style.

Rickard Fröberg, Chief Executive Officer

Hexatronic Group AB

Adopted May 5, 2025