Scheer IMC

Scheer IMC Modern Slavery Policy

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Scheer IMC Global Modern Slavery Policy

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1 Introduction

Scheer IMC is committed to upholding the highest standards of ethical conduct and human rights throughout our operations and supply chain. We recognise the seriousness of modern slavery and human trafficking and are dedicated to preventing these abuses in all aspects of our business. This policy outlines our commitment to compliance with the UK Modern Slavery Act and all other pertinent legislation, as well as our approach to preventing modern slavery in our operations and supply chain.

2 Definitions

Exploitation: slavery, servitude or forced or compulsory labour; sexual exploitation including but not limited to prostitution and sexual offences against children; the removal of organs unless duly authorised by the competent authorities; the securing of services or other benefits/advantages by force, threat or deception; and the securing of services by children or physically or mentally ill or disabled persons, where it is reasonable to expect, that someone would have refused them, but for their vulnerability.

Human trafficking: The organisation or facilitation of the travel of another person for the purpose of exploiting that person. It is irrelevant, whether this person has consented to the journey or not. The exploitation does not have to have actually taken place.

Modern slavery: This includes slavery, servitude, forced and compulsory labour and human trafficking.

3 Policy Statement

Scheer IMC is committed to eradicating modern slavery and human trafficking in all forms. We will not tolerate any form of forced labour, child labour, bonded labour, or human trafficking within our operations or supply chain. We are committed to ensuring that our business and supply chain partners share our values and adhere to the highest ethical standards.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of everyone, who works for Scheer IMC or is under the control of the Scheer IMC company. This policy applies to all Scheer IMC employees, directors, officers, consultants, contractors, agents, representatives, business partners, sponsors, interns, casual workers and student workers.

4 Responsibilities

Senior Management: Senior management is responsible for overseeing the implementation of this policy and ensuring compliance with the Modern Slavery Act. They will provide leadership, resources, and support to promote a culture of transparency and accountability.

Employees: All employees are responsible for familiarising themselves with this policy and conducting themselves in accordance with its principles. Employees should report any concerns or suspicions of modern slavery or human trafficking promptly and confidentially to their manager or the designated point of contact.

Supply Chain Partners: We expect our suppliers, contractors, and business partners to share our commitment to preventing modern slavery and human trafficking. We will work collaboratively with them to assess and address risks within our supply chain and promote compliance with the Modern Slavery Act.

5 Due Diligence

We will conduct due diligence assessments to identify and mitigate the risk of modern slavery within our operations and supply chain. This includes:

- Assessing the risk of modern slavery in our operations and supply chain, including geographical locations and industry sectors.
- Evaluating our suppliers and business partners to ensure they meet our standards for ethical conduct and human rights.
- Implementing measures to monitor and address any instances of modern slavery or human trafficking identified.

6 Reporting Violations

In the event of a reasonable suspicion of a breach of this policy, the Compliance Office must be informed immediately. The Compliance Office can be contacted via the e-mail address below, via the designated ticket in the ticket system (LEG tickets in Jira: Legal – Alle Vorgänge - Jira), or via the whistleblower system (https://im-c.hinweisgeberschutzsystem.de/). The same applies if a company of the Scheer Group receives an official notification concerning an alleged involvement in slavery activities.

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7 Awareness

The policy is binding on all Scheer IMC employees and is intended to ensure that they are informed of, and comply with, the obligations and provisions set out herein.

8 Continuous Improvement

We are committed to continuously improving our efforts to prevent modern slavery and human trafficking. We will review and update this policy regularly to reflect changes in legislation, best practices, and emerging risks. We will also monitor our performance and seek feedback from stakeholders to inform our ongoing efforts.

9 Reporting and Compliance

Scheer IMC will maintain accurate records and documentation to demonstrate compliance with the Modern Slavery Act and all other pertinent legislation. We will submit an annual statement detailing our efforts to prevent modern slavery and human trafficking, as required by law. This statement will be approved by senior management and published on our website.

10 Conclusion

Scheer IMC is committed to taking a proactive and robust approach to preventing modern slavery and human trafficking. We recognise that eradicating these abuses requires collaboration, transparency, and sustained effort across our organisation and supply chain. By adhering to this policy and working together with our stakeholders, we can make a meaningful contribution to ending modern slavery worldwide.

This policy serves as a framework for addressing modern slavery within the organisation and promoting compliance with the Modern Slavery Act and all other pertinent legislation.

11 Signatures

Signature	Signature
Christian Wachter	Sven R. Becker
First name, surname	First name, surname
Member of the Executive Board, Co-CEO	Member of the Executive Board, Co-CEO
Position	Position
10th February 2026	10th February 2026
Date	Date