

CTDI Europe's Anti-Slavery Policy

This statement of CTDI Europe follows the introduction of the legislation for prevention of modern slavery, servitude, forced or compulsory labour and human trafficking (Modern Slavery Act 2015). The statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and the Directive 2011/36/EU (Forced labour) and aims to set out the steps that we have taken – and will continue to take – to ensure that modern slavery and human trafficking are not taking place in our supply chains or in any parts of our business.

Our Responsibilities

It is part of CTDI Europe's strong commitment to be a socially responsible corporation. Our corporate values and high ethical standards are adhered to in all aspects of our daily business operations. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings. We aim to comply with all laws and regulations applicable to our business.

We place a high value on our employees and view them as our competitive edge in a very competitive service industry. Each employee is an important part of our corporate family and solidifies the foundation of our company. We promote a positive work environment with open communication where employee involvement is encouraged. We also fully accept and uphold the principles contained in the United Nations Declaration of Human Rights.

It is our policy and practice to offer equal employment opportunities, including opportunities relating to the employment application process, promotion, training, and career development, to all qualified persons regardless of gender, race, color, sex, age, religion, creed, sexual orientation, marital status, national origin, or disability. In support of our equal employment opportunities, we promote a non-discriminatory workplace. Discrimination against any applicant, employee, customer, or vendor is strictly prohibited.

We comply with all child labour laws and will not employ children in school-age. However, CTDI Europe tries to enable children and young people the entry into a future professional career through training and education programs (internships, trainee programs, summer training, and education).

We will conduct any corporate reorganization or restructuring responsibly and with consideration of all workers' rights and corporate responsibilities within the applicable legal jurisdiction. Therefore, we are committed to create effective systems and controls in place to prevent slavery and human trafficking in our corporate activities and supply chains.

How we Work with Third Parties

CTDI Europe seeks to build cooperative relationships with customers, suppliers, host governments, and other companies and communities in order to promote corporate social responsibility and commitment. We invest in developing long-term relationships and seek to establish relationships with customers, vendors, and suppliers that adhere to these same corporate social responsibility principles.

We, therefore, are confident that the risk of modern slavery in third parties with which we have a direct relationship is low.

Continuous Focus on Labour Rights

CTDI Europe will be taking additional steps to ensure that issues of modern slavery, human trafficking and other labour rights breaches are not taking place in our business and our supply chains. We are currently reviewing our procurement process and during the next years we will:

- Consider how we need to adjust resources allocated to the labour rights area;
- Update and improve our performance measures and consider whether and how we should enhance training, particularly for procurement staff and others making purchasing decisions;
- We have successfully created and implemented a Supplier Code of Business Conduct and established a comprehensive program to assess risk for all existing and potential new suppliers, distributors, and other organizations. This program includes maintaining and regularly updating a procurement questionnaire to evaluate whether third parties uphold appropriate policies and management systems aligned with our social responsibility principles. We continue to uphold and refine these practices to ensure ongoing compliance and alignment with our values;
- Improve the risk assessments of our supply chain and, where needed, undertake an on-site audit;
- If necessary, require that third parties provide supporting evidence that appropriate policies and management systems are in place.

Effectiveness of the Policy

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Level of communication and contact with our supply chain and their understanding of, and compliance with, our expectations.
- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Policy Violations

Violations of this policy may result in sanctions being imposed and contracts and business relationships being terminated.

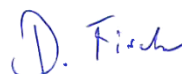
Validity

This policy is valid as of 02.12.2024 and replaces the former policy from 15.02.2023.



Dieter Hollenbach
Chief Executive Officer

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Daniel Fischer
Director Corporate Human Resources