

# MODERN SLAVERY STATEMENT FOR THE YEAR ENDED 31 DECEMBER 2023

This statement is issued on behalf of Cicor Technologies Ltd. ("Cicor Group or The Group") pursuant to section 54 of the Modern Slavery Act 2015 ("the Act"). It constitutes our Modern Slavery and Human Trafficking statement for the financial year ending 31 December 2023, setting out the measures Cicor Group takes to prevent Modern Slavery and Human Trafficking in our business and supply chain. This statement fulfils the obligation set out in Section 54, Part 6 of the Act and is implemented by each member of Cicor Group as listed at the end of the statement.

The Cicor Group does not tolerate any form of slavery, whether in its own production facilities, in the supply chain or in any other area of its business. The group has made and continues to make considerable efforts to minimize the risk of slavery and to promote fair working conditions within its own business and its supply chain and acknowledges that this work is an ongoing commitment. This statement refers to the activities undertaken in the financial year ended 31 December 2023.

## THE CICOR GROUP'S POSITION ON MODERN SLAVERY AND HUMAN TRAFFICKING

The Cicor Group is a globally active provider of full-cycle electronic solutions from research and development to manufacturing and supply chain management. The group's approximately 2,500 employees at 15 locations are serving leaders from the medical, industrial, and aerospace & defence industries. The Cicor Group is a global company with a unique technology and service portfolio. Our objective is to create added value for our customers, shareholders and employees. In this way we aim to be a reliable, fair and environmentally conscious business partner and employer. We take our responsibility towards society and the environment seriously in carrying out our business activities. Our Code of Conduct sets out what this means in terms of working conditions, social and environmental sustainability, as well as transparency, cooperation that inspires trust, and maintaining a dialogue. The Code of Conduct serves as a guideline on social responsibility for all employees of the Cicor Group and forms the basis for our daily work. As a global organization the Cicor Group has internal and external supply chains which stretch around the world. The companies covered by this report each have their own part in these supply chains and have assessed the risks relating to modern slavery which might occur them. Our main suppliers are based predominantly in Europe, North America, Asia and include also established international distributors which enable the Cicor Group to operate with such a global reach.



#### **RULES AND RESPONSIBILITIES**

The responsible, law-abiding, and ethical behavior of a company and its employees are of critical importance for business partners, customers, authorities and the public. A good reputation and compliance with applicable laws are major factors that help determine a company's long-term success. Our compliance structure ensures that the Group operates in a law-abiding and ethically acceptable manner as the basis for sustainable economic success. Each entity of the group is required to establish appropriate organizational and governance structures, policies and procedures, leadership and training.

## **CICOR GROUP UK BUSINESSES**

The Cicor Group operates from one entity, namely Axis Electronics Ltd. in Bedford ("Axis") within the UK. Axis is the UKs leading high reliability EMS company. The company on behalf of which this statement is made apply all Group policies in relation to employment conditions. Familiarization with the Code of Conduct is an integral part of the employee induction program for all new employees and is refreshed to all employees every two years. All employees of the company on behalf of which this statement is made are employed directly by the respective entity without the use of any indirect recruiting organizations. Employees are offered fair salaries for the roles, which are all higher than the UK living wage rates set from time to time by the Government.

## **SUPPLIER SELECTION AND ASSESSMENT**

Like other groups in the sector the Cicor group supply chain is complex, global and multi-tiered. Cicor procures goods and services from a variety of suppliers. The diversity of those goods and services acquired is a product of the multiple lines of business within the group. The Cicor group aims to work as closely as possible with its directly contracted suppliers worldwide. Our supplier relationships are often long lasting due to the complexity of the products and their lifecycles and so it is crucial to us that our supplier share our values of a responsible business. If Modern Slavery or Human Trafficking were found within our directly contracted suppliers, we would act immediately to work with the supplier and the relevant authorities to understand the circumstances and to put in place corrective actions that help the affected employees and protect them from further harm. If a supplier is unwilling to address the issue, then a corrective action would include termination of contracts, selection of an alternative supplier and reporting the matter to the relevant law enforcement agency in the territory.



#### **COMBATTING MODERN SLAVERY**

In the financial year 2023 Cicor Group has made an active effort to combat modern slavery. Our activities included:

- Integration of the Cicor Group Integrity Line as group-wide whistleblowing system. The
  Cicor Group Integrity Line is a fully established digital tool available in 8 languages for both
  internal and external parties through the Cicor website. There were no reports or complaints
  relating to human rights made to this line in 2023.
- Further development of the Cicor Groups Compliance and ESG strategy including implementation of KPI indicators on environmental as well as health and safety topics on a group level.
- Further development of the Cicor Group Compliance Management System ("CMS") which sets out to ensure that the Group operates in a law-abiding and ethically acceptable manner as basis for economic success.
- Implementation of a group wide GDPR strategy giving each group member the access to the Cicor GDPR platform including documentations and internal regulations.

# OBJECTIVES FOR FINANCIAL YEAR 2024/2025 IN THE FIGHT AGAINST MODERN SLAVERY AND HUMAN TRAFFICKING

The work to prevent and abolish modern slavery and human trafficking is a continuous process. The Cicor Group constantly reviews and refines the steps we take as we learn more about how to mitigate these risks in the future. Specific targets for the Group, including all members of the Cicor Group, include:

- Implementation of a group-based digital supply chain tool to meet the requirements especially mentioned Supply Chain Due Diligence law for Germany, Switzerland and other similar legislations in other countries.
- Implementation of a group-based e-Learning platform for our employees.
- Roll-out of the Cicor ESG program including further development of supplier risk analysis and reducing the risks of modern slavery in our supply chain to make them more



sustainable. For us, a sustainable supply chain does also include the reduction of the risk of modern slavery occurring.

- Update, expand and detail our current Cicor Group Code of Conduct.
- Progressing actions identified as part of the Group's Compliance & ESG pathway.
- Ensuring alignment of actions with current and upcoming legislation.

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commitment to respect human rights throughout its business, operations, and supply chain
During 2024 the Cicor Group will continue its focus on embedding and advancing its