

SNP Modern Slavery Statement

This statement has been prepared in line with the UK Modern Slavery Act 2015 and represents SNP Schneider-Neureither & Partner SE 's (hereinafter SNP) commitment to addressing slavery and human trafficking for the fiscal year ending in December 2025.

1. Introduction

Since 1994, SNP has been helping companies worldwide to shape their own journey towards a digital and connected future. SNP Schneider-Neureither & Partner SE, headquartered in Heidelberg, Germany, is the parent company of the SNP Group. The SNP Group has currently more than 1,600 employees worldwide at 36 locations in 23 countries, including a subsidiary in UK: Harlex Consulting Ltd. SNP Group provides software and consulting services for complex SAP projects, including SAP S/4HANA transformations, mergers and acquisitions, system landscape optimizations, cloud data integrations, and system decommissioning. Our commitment extends beyond profit; we work hand in hand with our customers and partners to achieve collective success, prioritize the growth and well-being of our people, and champion sustainable practices for a better future.

We at SNP are dedicated to ensuring that our business operations and supply chains are free from any form of modern slavery or human trafficking. As a provider of software and services for digital transformation, we have a less extensive upstream value chain than would be the case for the manufacturing industry. We therefore only have a small volume of physical input goods. Nevertheless, we continuously strive to uphold the highest ethical standards and work closely with our partners to promote transparency and accountability throughout our operations.

2. SNP's Commitment to Human Rights and Fighting Modern Slavery

SNP corporate governance practices are characterized by fair, transparent, and correct cooperation with employees as well as business partners and the public. Responsible corporate governance also means complying with legal regulations within decision-making and control processes and actively implementing recommendations that go beyond these

regulations. In 2025, we further strengthened our sustainability expertise. Sustainability is a fixed component of our internal risk management as well as of our Groupwide risk and opportunity inventory. This enables us to identify and manage sustainability-related risks and opportunities at an early stage.

In the interests of promoting transparency, we consider the regulatory requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS) in our sustainability reporting. Information on the development of sustainability topics, including human rights issues, considering our upstream and downstream value chain, is thus provided in the 2025 Group Non-Financial Report of SNP.

In addition, the following policies and systems to prevent modern slavery and human trafficking are implemented into our operations:

- **HR Policies:** We observe all legislation and regulations in force which are relevant and applicable. This includes statutory provisions against human trafficking, forced labor and child labor. For this reason, our internal policies and processes likewise serve to prevent violations of human rights and to promote fair working conditions. Our policies and processes are mainly based on the UN Guiding Principles on Business and Human Rights, the ILO's eight Core Labor Standards and the OECD Guidelines for Multinational Enterprises.
- **Code of Conduct:** Clear policies and actions strive for SNP's Code of Conduct sets out the general principles and standards of behavior expected from all employees of the SNP Group to ensure integrity, accountability, and ethical practices within our organization. Everyone at SNP must respect the corporate values – Customer Success, Respect for all within our Community and Excellence – and must comply with all applicable laws and regulations. We are committed to promoting human rights within our sphere of influence and fostering an inclusive environment where diverse perspectives and talents are valued and encouraged. We further engage in initiatives that support social well-being within the scope of our influence.
- **Supplier Code of Conduct** sets out the standards we expect from our suppliers. We expect our suppliers to fully comply with all applicable national and international laws and provisions, and to always act ethically and in all places. Thus, SNP's suppliers

must respect and comply with internationally recognized fundamental rights and human rights. In addition, suppliers must not tolerate forced labor (this includes modern slavery and human trafficking) and child labor. Our suppliers are also to observe the prohibition of unlawful eviction and unlawful taking of land, forests and waters. In the field of Labor standards, SNP's suppliers must comply with the labor laws of the countries and regions in which they operate. This includes complying with the maximum number of working hours and granting vacation time as specified in the applicable laws and paying reasonable remuneration and ensuring that the corresponding statutory minimum wage is paid.

- **Whistleblowing System:** SNP maintains an externally operated reporting system that enables the confidential and anonymous reporting of relevant violations of SNP's Code of Conduct and requires employees to report relevant concerns through the available reporting channels. Suppliers are required to report suspected violations of the Supplier Code of Conduct and applicable laws via the supplier reporting channels designated by SNP. Reports are handled by our Legal and Compliance department under the principle of dual control. Where a negative impact is identified, the responsible functions carry out a systematic review. Appropriate remediation is then defined, prioritized, assigned and monitored for effectiveness, including through internal audits.

3. Supplier Evaluation and Risk Assessment

All suppliers must undergo a thorough evaluation by SNP before being assigned any tasks, ensuring they meet our stringent requirements. We assess their compliance with legal standards, adherence to the SNP Supplier Code of Conduct, and their quality and information security standards. We engage with our suppliers through supplier meetings before entering into a business relationship and through regular dialogue thereafter.

Additionally, we conduct risk assessments to identify potential risks within our supply chains. These assessments form part of our double materiality assessment, which was first carried out in 2024 and is updated annually. It uses a five-point scale to evaluate the scale, scope and irremediable character of potential adverse impacts, including impacts on human rights. In the 2025 reporting year, no actual or potential adverse human rights impacts were

identified. Our risk management processes are regularly monitored and reviewed to maintain high standards. Furthermore, our Quality Management System is ISO 9001:2015 certified, underscoring our commitment to excellence.

The results of our risk inventory and materiality assessment, including human rights and compliance matters, are presented to the Executive Board and the Supervisory Board. In addition, ESG objectives are embedded in the Executive Board's long-term variable remuneration and account for 20% of the multi-year LTI.

4. Training

We provide regular compliance training to our employees to ensure they understand and respect human rights and know how to identify and report any concerns. These training courses cover a wide range of topics, including our Code of Conduct, which outlines the ethical standards and expectations for all employees. By familiarizing our staff with these guidelines, we promote a culture of integrity and accountability. Additionally, our training program emphasizes the importance of recognizing and addressing any potential human rights violations, ensuring that our employees are well-equipped to uphold our commitment to ethical practices.

Our training modules follow a risk-based approach and are reviewed and updated regularly to reflect changes in our Code of Conduct and risk situation. Knowledge tests are used to document the effectiveness of the training.

5. Performance Indicators

We use the following key performance indicators (KPIs) to measure our effectiveness in combating modern slavery:

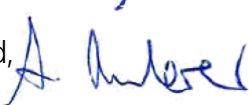
- Number of employees trained in human rights, harassment and discrimination: 94% completion rate in 2025.
- Number of incidents of modern slavery reported and addressed: 0.

In the reporting year, no incidents related to harassment or human rights violations have been reported.

6. Conclusion

SNP Schneider-Neureither & Partner SE as well as its affiliated companies within the SNP Group are dedicated to preventing modern slavery and human trafficking in their operations and supply chains. Given the type of our business, our stringent policies and thorough risk assessments, the risk of encountering modern slavery within our operations is very low. We will continue to review and improve our practices to ensure we are effectively combating modern slavery. For the coming reporting period, we aim to at least maintain the completion rate of 94% achieved for our mandatory compliance training programs in 2025.

This statement has been approved by the Executive Board of SNP Schneider-Neureither & Partner SE.

Signed, 

Andreas Röderer
Chief Financial Officer

July 31, 2026