

# **Anti-Slavery and Human Trafficking Policy**

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## **Purpose**

Testmo GmbH (the “Company”) is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy, includes forced labor and unlawful child labor. This Anti-Slavery Human Trafficking policy (this “Policy”) is consistent with the UK Modern Slavery Act of 2015 and the Company’s core values which are designed to protect and advance human dignity and human rights in our global business practices. The Company’s employees, contractors, subcontractors, vendors, suppliers, partners and other through whom the Company conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery or otherwise violates this Policy.

## **Scope**

This Policy applies to all of the Company’s personnel employed by or engaged to provide services to or on behalf of Company in any capacity, including employees at all levels, directors, officers, contingent workers (including agency workers), casual staff, volunteers, agents, independent contractors, partners (collectively, “Employees”) and suppliers.

Every Employee is responsible for reading, understanding and complying with this Policy. The Company’s managers are responsible for ensuring that Employees who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them. If you have any questions or concerns relating to this Policy, consult the Company’s legal department at [legal@testmo.com](mailto:legal@testmo.com). If you learn of any conduct that you believe may violate this Policy, report it immediately by any of the means listed under the heading “Policy Compliance” below.

## **Company Commitments**

The Company strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organization or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards. We have a zero-tolerance approach to modern slavery in our organisation and our supply chains. The prevention, detection and reporting of modern slavery in any part of our organization or supply chain is the responsibility of all those working for us or on our behalf. Employees must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this Policy. Employees, suppliers and others through whom the Company conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons;
- Procuring commercial sex acts;
- Using forced labor in the performance of any work;

- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided by the Company), any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging applicants/candidates recruitment fees;
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment;
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards; or
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain. We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach we will also assess the merits of writing to suppliers requiring them to comply with our minimum standards required to combat modern slavery and trafficking. Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to our minimum standards required to combat modern slavery and trafficking. As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our minimum standards required to combat modern slavery and trafficking.

The Company has undertaken actions, and is committed to maintaining and improving its systems and processes, to eradicate human trafficking and slavery in its direct hardware supply chain.

### **Investigations and Audits**

We will perform investigations and audits to verify that business is being conducted in compliance with this Policy. All Employees and third parties through whom the Company conducts business are required to fully and promptly cooperate with the Company's internal and external auditors and investigators, and must respond fully and truthfully to their questions, requests for information, and documents. Any failure by an Employee or organizations working on our behalf to completely cooperate, or any action to hinder an investigation or audit, including for example, hiding or destroying any information or documentation, providing false answers or false information, or deleting email or other documents, may be grounds for disciplinary action, up to and including termination, subject to applicable law.

### **Training**

We provide specific training to those staff members who are involved in managing recruitment and our supply chains.

### **Policy Compliance**

If you think that someone is in immediate danger, call the police. Otherwise, you should report any conduct that you believe to be a violation of this Policy, either directly to a member of the Compliance Team at [compliance@testmo.com](mailto:compliance@testmo.com) or to the Company's Legal Department at [legal@testmo.com](mailto:legal@testmo.com). Employees who fail to report actual or suspected misconduct may be deemed in violation of this Policy, as permitted by applicable law. If you do not understand the implications of this Policy or how it may apply to you, please speak directly to your manager.

The Company will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report. Any violation of this Policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

### **Our Future Steps**

We will continually review our approach to modern slavery and human trafficking, and will develop a process which enables us to monitor and measure our performance. This statement is made pursuant of Section 54, Part 6 of the Modern Slavery Act 2015, and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our business, or any part of our supply chain.

Randall E. Jacobs, Chief Executive Officer