

June 2025
Blanco Technology Group Limited

OUR POSITION ON MODERN SLAVERY

Blanco Technology Group Limited, together with its direct and indirect subsidiaries, maintains an absolute zero-tolerance stance towards all forms of modern slavery, human trafficking, forced labour, and child labour, whether within our own operations or across our supply chain. This prohibition extends without exception to forced, bonded, indentured, and involuntary prison labour, debt bondage, slavery, and the trafficking of persons, and applies equally to our suppliers and their wider supplier networks.

As a signatory to the United Nations Global Compact since 2022, we are bound by and committed to its Ten Principles, including the responsibility to respect and uphold internationally recognised human rights and to ensure we are never complicit, directly or indirectly, in their violation. These commitments are not merely aspirational; they are embedded in the way we conduct business every day.

ABOUT US

Blanco is a global leader in data erasure and mobile diagnostics, delivering trusted, secure, and certified solutions that empower organizations to manage end-of-life data and IT assets responsibly.

With a strong commitment to innovation, Blanco holds more than 40 patented or patent-pending technologies. Our solutions are relied upon by enterprises, government agencies, and IT asset disposition (ITAD) providers across multiple regions for their proven reliability, robust security, and compliance with international standards.

Core Services

- Certified data erasure for IT assets and storage devices
- Mobile diagnostics and erasure solutions
- Compliance and risk management support
- Sustainability-focused IT asset lifecycle management

MODERN SLAVERY STATEMENT

This Modern Slavery Statement reflects our commitment to operating as a responsible and principled organisation, firmly grounded in our core values of equity, respect, and integrity. The Statement sets out the actions undertaken by us during the calendar year 2024 to identify, assess, and address the risks of modern slavery and human trafficking across our operations and supply chain.

This Statement has been prepared in accordance with the requirements of applicable international legislation, including the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, the UK Modern Slavery Act, the Australian Modern Slavery Act, the German Act on Corporate Due Diligence in Supply Chains, the California Transparency in Supply Chains Act, and the Norwegian Transparency Act. Where the requirements of these legislative frameworks overlap, this Statement is intended to satisfy them collectively.

Accordingly, any references to Blanco's efforts to prevent modern slavery within its supply chains and business operations, including its policies, processes, and procedures — extend to all Blanco entities

June 2025
Blanco Technology Group Limited

unless explicitly stated otherwise. For the purposes of this statement, terms such as “Blanco,” “the company,” “we,” “us,” and “our” refer collectively to Blanco, its subsidiaries, and controlled entities, unless the context indicates otherwise.

OUR SUPPLY CHAIN

Blanco’s core business activities are generally assessed as low risk for modern slavery and labour rights violations. The company does not engage in manufacturing, and its primary operations are carried out by a highly skilled and specialised workforce.

Blanco’s operations are underpinned by a global supply chain that supports the delivery of goods and services essential to our business. Our supplier base includes:

- Contractors and subcontractors
- Providers of staff support and office maintenance services (e.g., catering, cleaning, waste management)
- IT infrastructure and cloud service providers
- Recruitment and staffing agencies

The majority of our suppliers are based in the European Union and include global providers of IT equipment and infrastructure.

This low-risk profile also extends to the services and solutions Blanco procures, which consist of software and professional services. These characteristics significantly reduce the likelihood of exposure to exploitative labour practices within both our direct operations and our supply chain.

Blanco maintains a zero-tolerance policy toward slavery and human trafficking. We have no reason to believe that such practices exist within our supply chains. However, should any instance of non-compliance be identified and not resolved in a timely manner, Blanco will take decisive action, including the termination of the business relationship.

OUR RISK ASSESSMENT

We take a structured approach to assessing modern slavery risks across our operations, workforce, and supply chain. Our assessments consider a range of factors including geographic exposure, sector-specific vulnerabilities, the nature of services and products procured, and the profile of our business relationships. These assessments are reviewed periodically and updated to reflect changes in our operating environment or emerging risk indicators.

Our assessment of our own operations and workforce during 2024 continued to indicate a low risk of modern slavery. The technical and professional nature of our business places us in an inherently lower risk sector, with our workforce comprising skilled professionals engaged on a full-time basis. We do not engage seasonal or migrant workers within our operations. At the time of hiring, we verify all personnel to help identify whether any individual may be subject to forced or involuntary labour, including forced, indentured, bonded, or involuntary prison labour.

June 2025
Blanco Technology Group Limited

ONGOING MONITORING

Where risk factors are identified through our screening or assessment processes, we undertake enhanced due diligence as appropriate. We remain vigilant to red flags that may indicate the presence of modern slavery risks and are committed to taking appropriate remedial action where concerns arise.

KPI INDICATORS

We measure the effectiveness of our efforts to combat modern slavery and human trafficking through a set of defined Key Performance Indicators (KPIs), which are reviewed annually. The table below sets out our performance against these KPIs for the calendar year 2024.

KPI	Target	2024 Performance
Percentage of staff completing annual modern slavery and compliance training	95%	96%
Investigate and resolve all instances of supplier modern slavery non-compliance	100%	No reports of non-compliance received
Monitor and review the outcomes of all whistleblowing cases reported	100%	No whistleblowing cases received
Percentage of customers screened through our compliance processes prior to engagement	100%	Screening Process under development

POLICIES

We maintain a range of internal policies that together underpin our commitment to ethical business conduct and the prevention of modern slavery and human trafficking across our operations and supply chain. We are continuously applying these policies across the organisation, reinforcing a culture of accountability, transparency, and respect for human rights at every level of business.

Our policy framework includes the following:

- **Code of Business Conduct** — sets out the ethical standards and behaviours expected of all personnel, articulating our zero-tolerance stance towards modern slavery, forced labour, human trafficking, and all related forms of exploitation.
- **Quality Management Policy** — ensures that the delivery of our services meets consistent standards of excellence, underpinned by responsible and ethical operational practices.
- **Information Security Management System (ISMS)** — governs the protection of personal and confidential information, ensuring that data relating to our workforce, clients, and suppliers is managed securely and lawfully.
- **Risk Management Policy** — provides the framework within which risks across our operations, including those relating to modern slavery, are identified, assessed, escalated, and managed.

June 2025
Blanco Technology Group Limited

- **Confidentiality Policy** — reinforces our commitment to protecting sensitive information and maintaining the trust of all individuals and organizations connected to our business.
- **Corporate Social Responsibility (CSR) Statement** — reflects our broader commitment to operating as a responsible business, embedding social, ethical, and environmental considerations into our decision-making.
- **Whistleblowing Policy** — ensures that all personnel can raise concerns safely, confidentially, and without fear of retaliation, providing a critical mechanism for the early identification of potential misconduct including modern slavery concerns.
- **Anti-Corruption and Anti-Bribery Policy** — sets out our zero-tolerance approach to bribery and corruption in all its forms, consistent with our obligations under applicable law and our commitment to principled business conduct.
- **Travel and Expenses Policy** — governs business travel and expenditure, promoting transparency and accountability in employee conduct.
- **Procurement Policy** — requires all suppliers to demonstrate compliance with applicable employment, wage, and human rights laws as a condition of engagement, ensuring that our ethical standards extend into our wider supply chain.

All of the above policies are made available to our employees and are periodically reviewed and updated to ensure they remain current, effective, and reflective of evolving legal requirements and best practices. Through this ongoing review process, we continuously seek to enhance the clarity, scope, and practical effectiveness of our policy framework, strengthening our ability to prevent modern slavery and uphold the rights and dignity of all individuals connected to our business.

UN GLOBAL COMPACT

Since 2022, the Company has been a participant in the United Nations Global Compact (UNGC). Consistent with this commitment, we align our policies, operational practices, and strategic priorities with the UNGC's ten principles relating to human rights, labour standards, environmental stewardship, and anti-corruption. In addition, we support the United Nations Sustainable Development Goals (SDGs), including the global effort to eliminate modern slavery, forced labour, and human trafficking in all forms.

In accordance with our obligations as a UNGC participant, we submitted our annual Communication on Progress (COP) to the United Nations Global Compact for the 2024 calendar year. This disclosure outlines the measures implemented by the Company to uphold the ten principles of the UNGC and to contribute to the advancement of the Sustainable Development Goals within our operations and sphere of influence.

We remain committed to embedding the principles of the UN Global Compact throughout our governance framework and business practices, and to maintaining a strict zero-tolerance approach to modern slavery and human trafficking across our operations and supply chain.

June 2025
Blanco Technology Group Limited

TRAINING

Training is essential to combat Modern Slavery. All employees are informed of company policies during induction. Additional training is delivered to management, HR, and supply and contracting teams to enable them to identify indicators of forced labour or modern slavery, understand reporting procedures, and ensure compliance with relevant policies.

We believe that an informed and values-driven workforce is one of our most effective tools in the fight against modern slavery, and we remain committed to strengthening our training offering in this area on an ongoing basis.

OUR EFFECTIVENESS IN COMBATING HUMAN TRAFFICKING AND MODERN SLAVERY

We regularly evaluate the nature and extent of our exposure to the risk of modern slavery and human trafficking across our operations and supply chain. Where a potential risk is identified, we take prompt and proportionate steps to address and remediate it. To date, we have not identified any suspected incidences of modern slavery or human trafficking within our operations or supply chain.

We continued during 2024 to strengthen our procurement processes, requiring all suppliers to contractually commit to compliance with applicable employment, wage, and human rights laws as a condition of engagement. Our internal policies continued to be applied and embedded across the organisation and are currently undergoing a comprehensive review to enhance their effectiveness and alignment with evolving legal requirements and best practices.

Looking ahead, we are in the process of introducing a Visual Compliance screening tool to strengthen our customer due diligence processes, enabling screening of all prospective customers against applicable restricted party lists and sanctions regimes in adherence with the export control laws of the United States of America and the European Union. We remain firmly committed to respecting human rights across our business and shall continue to strengthen our policies and practices to prevent, to the fullest extent practicable, child labour, modern slavery, and human trafficking across our company and supply chain.

This statement has been approved on behalf of Blanco Group by

Satoru Ogawa
Chief Financial Officer
Blanco Group

June 23, 2025.