

Modern Slavery and Human Trafficking Statement 2025

(pursuant to Section 54 UK Modern Slavery Act 2015)

1. Introduction

This statement is made by Basler AG for the financial year 1 January 2025 to 31 December 2025. It sets out the steps taken to prevent modern slavery, forced labor and human trafficking in our business and supply chains.

Basler AG is a company incorporated and headquartered in Germany. While the company does not maintain a separate legal entity in the United Kingdom, it engages in international business activities, including relationships with customers and partners in the UK. In light of this business presence, Basler AG considers it appropriate to publish this statement in line with the spirit and expectations of the Modern Slavery Act and as part of its broader commitment to transparency and responsible business conduct.

Basler is committed to acting ethically and with integrity in all business relationships and to implementing effective systems and controls to safeguard against modern slavery.

2. Organization, Operations and Supply Chains

Basler is a leading international expert in computer vision, offering a broad portfolio of image processing hardware and software as well as customer-specific solutions.

The Basler Group employs approximately 850 people globally and operates in Europe, Asia and North America, including Germany, France, Italy, Poland, USA, India, Singapore, China, Korea, Japan, Taiwan, UK, Finland, Malaysia and the Netherlands.

Basler's supply chains are global and multi-layered and include in particular:

- Suppliers of electronic components, mechanical parts and equipment
- Logistics providers and service suppliers (IT, professional services)
- Primarily global suppliers, including sourcing from higher-risk regions in upstream tiers

As an electronics manufacturer, Basler's supply chain extends into multi-tier networks, particularly for raw materials and minerals.

3. Policies and Commitments

Basler applies a zero-tolerance approach to modern slavery and human trafficking. This commitment is embedded in the company's governance framework and reflected in its policies and procedures.

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Management Board: Hardy Mehl (CEO) · Ines Brückel · Dr. Kai Jens Ströder

Chairman Supervisory Board: Norbert Basler

Companies' register of Luebeck local court (Amtsgericht Luebeck) - Commercial Registry Number 4090

VAT ID: DE 135 098121 · WEEE-Reg.-No.: DE83888045

Bank: Joh. Berenberg, Gossler & Co. KG, Hamburg · IBAN: DE96 2012 0000 0014 5290 02 · Swift-Code-BIC: BEGODEHH

Key elements include:

- **Code of Conduct**
Sets out the expectations regarding ethical behavior, human rights, and compliance with applicable laws
- **Supplier Code of Conduct**
Establishes binding minimum standards for suppliers, including the prohibition of forced labor, child labor and human trafficking
- **Whistleblowing System**
Enables employees and third parties to report concerns in a confidential and secure manner

Basler aligns its policies with internationally recognized standards, including the ILO Core Labor Standards and general principles of human rights protection.

These requirements apply to employees, contractors and business partners and form an integral part of contractual relationships with suppliers.

4. Governance and Responsibility

Responsibility for addressing modern slavery risks lies with:

- Board of Directors of Basler AG

Operational responsibility is shared across relevant functions, in particular:

- Procurement (supplier selection and monitoring)
- Legal & Compliance (policy framework and oversight)
- Sustainability (risk analysis and reporting)

Basler is in the process of further strengthening governance by implementing regular internal reporting on modern slavery risks and mitigation measures to senior management and the Board.

5. Risk Assessment

Basler conducts risk assessments to identify potential exposure to modern slavery risks within its operations and supply chains.

Key risk factors include:

Country risk

Basler's supply chains involve sourcing of minerals such as tin, tantalum, tungsten, gold (3TG), cobalt and mica from conflict-affected and high-risk areas (CAHRAs), which are associated with elevated risks of forced labor.

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Sector-specific risk

As a manufacturer of electronic components, Basler's products require materials linked to mining activities where human rights risks may occur.

Supply chain structure

Basler performs assembly-only production, meaning:

- Highest risk exposure lies in upstream supply chains
- Limited direct visibility beyond tier-1 suppliers

Supplier structure

The supplier base includes:

- Large global suppliers with mature compliance systems
- Smaller regional suppliers (primarily EU-based)

Transparency decreases significantly in deeper supply chain tiers (e.g. smelters, mines).

Risk conclusion

- Highest risks: upstream extraction of minerals (3TGs, cobalt)
- Likelihood: possible
- Severity: limited due to increasing transparency and controls

No confirmed severe human rights violations were reported during the reporting period.

6. Due Diligence Processes

Basler has implemented a range of risk-based due diligence measures to prevent and mitigate modern slavery risks:

Supplier onboarding and audits

- Risk-based supplier audits prior to contracting
- Focus on strategic and high-volume suppliers
- Inclusion of human rights criteria

Contractual obligations

- Mandatory adherence to the Supplier Code of Conduct
- Explicit prohibition of forced labour and child labour
- Requirement to comply with applicable labour laws and ILO standards

Supplier self-assessments

- Use of CMRT and EMRT templates (RMI standards)
- Annual supplier questionnaires

Monitoring and escalation

- Audit findings and supplier documentation reviewed regularly
- Red flags trigger additional analysis and escalation
- Compliance concerns can be reported via established whistleblowing channels

Corrective actions

- Implementation of corrective action plans
- Potential disengagement in case of serious violations

7. Remediation and Grievance Mechanisms

Basler operates a confidential whistleblowing system accessible to employees and third parties.

Reported concerns are:

- investigated in an impartial and timely manner
- handled with strict confidentiality
- followed by appropriate corrective measures where necessary

Basler maintains a strict non-retaliation policy.

8. Training and Awareness

Relevant employees receive training, particularly in:

- Procurement
- Supplier management
- Legal & Compliance

Training focuses on:

- internal standards and policies
- reporting mechanisms and responsibilities

9. Monitoring Effectiveness

Basler continuously evaluates the effectiveness of its measures through:

- monitoring supplier compliance
- analysing reported incidents
- reviewing and updating policies and processes

Basler's approach is continuously adapted in line with regulatory developments and evolving risk landscapes.

10. Future Actions (2026)

We aim to further strengthen our approach by:

- Enhancing supplier risk mapping, especially for upstream tiers
- Expanding training programs across global entities
- Improving data collection and transparency in the supply chain

11. Approval

This statement has been approved by the **Board of Directors of Basler AG**.

Date: June 30th 2026

A handwritten signature in blue ink, reading "Hardy Mehl". Below the signature is a horizontal line.

Hardy Mehl (2. Juni 2026 15:46:22 GMT+2)

Hardy Mehl
CEO

A handwritten signature in blue ink, reading "Ines Brückel". Below the signature is a horizontal line.

Ines Brückel (30. Juni 2026 17:46:40 GMT+2)

Ines Brückel
CFO

A handwritten signature in blue ink, reading "Dr. Kai Jens Ströder". Below the signature is a horizontal line.

Dr. Kai Jens Ströder
CTO