

Modern Slavery and Human Trafficking Statement

For the financial year ending 31 December 2025

IONOS Cloud Limited

This statement is made by IONOS Cloud Limited ("IONOS") pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps taken during the financial year ending 31 December 2025 to prevent modern slavery and human trafficking in our business and supply chains.

Our business and supply chains

IONOS is a provider of cloud infrastructure and digital services. Our services include cloud solutions and related digital infrastructure services. Our operations involve the provision and management of technology infrastructure used to support customers and internal business operations.

Our principal supply chains include:

- server hardware and related technology equipment;
- data centre and infrastructure related components and services;
- software and technology services;
- professional services;
- recruitment and temporary labour providers; and
- Facilities based services, including cleaning and security.

Our suppliers are located primarily in the UK and Europe, although we recognise that certain hardware and infrastructure related supply chains may extend into other jurisdictions.

Our policies and governance

IONOS is committed to acting ethically and with integrity in all business dealings and relationships. We maintain a zero tolerance approach to modern slavery and human trafficking.

Our approach is supported by internal policies and procedures, including:

- Code of Conduct, which sets out the standards of behaviour expected of our employees;
- Whistleblowing Policy, which provides channels for concerns to be raised confidentially and, where appropriate, anonymously;
- Anti-Bribery Policy; and
- Employment related procedures supporting lawful pay, fair treatment and appropriate workplace standards.

Oversight of modern slavery risk sits with relevant management functions, with escalation to the Board of Directors where appropriate.

Risk assessment

Given the nature of our business, we consider the risk of modern slavery within our directly employed office based workforce to be relatively low. However, we recognise that modern slavery risks may arise in particular areas of the supply chain, especially where services involve lower paid, outsourced or temporary labour, or where goods are sourced through complex international supply chains.

We consider the following areas to present relatively higher inherent risk than our direct employee population:

- Facilities based services such as cleaning and security;
- recruitment and temporary labour arrangements; and
- certain hardware, infrastructure and technology supply chains.

We continue to review these risk areas as part of our supplier management and compliance processes.

Due diligence and supplier management

IONOS applies proportionate due diligence processes when engaging suppliers. These processes may include reviewing the nature of the supplier's services, considering relevant risk factors associated with the supplier or service category, and escalating concerns identified during onboarding or contractual review.

We also make use of group level procurement and risk management processes to support oversight of key infrastructure, hardware and technology suppliers.

Employment practices

IONOS is committed to fair and lawful employment practices.

We take steps designed to reduce the risk of labour exploitation within our workforce, including:

- checking that employees have the right to work where legally required;
- paying employees at or above the applicable National Living Wage or National Minimum Wage;
- maintaining transparent employment documentation and workplace policies; and
- monitoring the use of temporary or agency labour where relevant.

We do not knowingly tolerate forced labour, bonded labour, involuntary labour or unlawful deductions from wages.

Training and awareness

Mandatory Code of Conduct training is provided to employees and includes guidance on ethical conduct, identifying inappropriate or unlawful practices, and how to raise concerns.

Completion levels for mandatory Code of Conduct training during the reporting period were below our target. We have identified this as an area for improvement and will take steps during 2026 to improve completion rates through targeted follow-up and enhanced management oversight.

Reporting concerns and remediation

We encourage employees and other workers to speak up if they have concerns about conduct that may be unlawful, unethical or inconsistent with our policies.

Concerns may be raised through our reporting channels under the Whistleblowing Policy, which are intended to allow individuals to report issues confidentially and without fear of retaliation for raising a concern in good faith.

Where concerns relating to modern slavery, human trafficking or labour exploitation are identified, they will be reviewed and escalated as appropriate. Depending on the circumstances, actions may include further investigation, engagement with the relevant supplier or party, corrective action, and where necessary, reconsideration or termination of the relevant business relationship.

Measuring effectiveness

IONOS recognises the importance of assessing the effectiveness of the steps taken to address modern slavery risk.

During the reporting period, one of the measures used was completion of mandatory Code of Conduct training. Over the next financial year, we intend to continue developing our approach to monitoring effectiveness, including consideration of additional measures relating to supplier due diligence and risk review.

Approval

This statement was approved by the Board of Directors of IONOS Cloud Limited on 12 June 2026

Signed:

Patrik Heider

Signiert von:

Patrik Heider

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CFO

Director

For and on behalf of IONOS Cloud Limited

Date: 12 June 2026