MODERN SLAVERY ACT POLICY STATEMENT FOR FINANCIAL YEAR ENDED 31 DECEMBER 2024

Introduction

This statement is made by Wacker Neuson Ltd., Stafford ("Wacker Neuson UK") pursuant to Section 54 (1) of the Modern Slavery Act 2015 and sets out the steps the company is taking to minimize the risk of modern slavery and human trafficking taking place within its organization and supply chains. It has been approved by Wacker Neuson UK's board of directors on 7 May 2025.

Wacker Neuson UK has a zero tolerance to any form of modern slavery. We are committed to integrity and honesty as well as the commitment to consistent compliance with legal and regulatory requirements. Both our employees as well as our suppliers are required to adhere to this standard. We also expect our suppliers to commit to respecting human rights, to establish appropriate due diligence processes and to pass this expectation on to their own suppliers.

Structure and Business

Wacker Neuson UK is part of Wacker Neuson Group, an international network of companies, employing around 6,300 people worldwide, including about 3,000 in Germany and 70 in the UK. As a leading manufacturer of light and compact equipment, the Group offers its customers a broad portfolio of products, a wide range of services and an efficient spare parts service. The product brands Wacker Neuson, Kramer, Weidemann & Enar belong to the Group. The headquarters are in Munich, Germany and it operates as a management holding company with a central management structure which is responsible for strategic Group governance functions.

There are approximately 140 sales and service locations worldwide and production facilities in Germany, Austria, USA, Serbia and China. Wacker Neuson UK operates as a sales and service affiliate of the Group. It distributes Wacker Neuson Groups´ range of products and spare parts via a dealer network throughout the United Kingdom and Ireland. In addition to is facilities in Stafford, one of the Groups dedicated research and development centres is located at Wacker Neuson UK's Leicester facilities.

Supply Chain

Within the UK, Wacker Neuson UK maintains relationships with local suppliers on a smaller scale, while all products and spare parts, accounting for around 90% of procurement, are sourced from other Wacker Neuson Group companies. For the engineering and production of its machines and equipment, the Group sources pre-manufactured parts, components and raw materials for its production plants via a global network of suppliers.

Policies

We operate a number of group wide or local policies to ensure we are conducting our business in an ethical and transparent way. These include:

- **Code of Conduct**

  All of our employees are required to comply with the company's code of conduct which sets out the principles of company ethics and the daily conduct expected in the workplace and also provides guidelines on preventing corruption.

To be Reviewed 13.05.2025

Each employee of Wacker Neuson UK are required to sign a statement confirming that they have received, read and understood the Code of Conduct.

The most recent version of the Code of Conduct can be found online at https://wackerneusongroup.com/en/sustainability

- **Supplier Code of Conduct**

One of the key policies of the Wacker Neuson Group is the Supplier Code of Conduct, which is firmly embedded as a mandatory part of the contractual framework and the onboarding process. Additionally, there is the Code of Conduct for business partners, which is gradually extended to all customer relationships to ensure high standards are maintained. Both sets of regulations are based on the Wacker Neuson Group's statement of principles on the respect of human rights, aligned with international principles such as the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. These documents address fundamental issues such as the respect of human rights, labour rights, and environmental protection, including child and forced labour. Together, the policies ensure that clear requirements Combined Management Report 125 126 Wacker Neuson Group Annual Report 2024 for partners along the entire value chain are defined and effectively communicated during the onboarding process of new business partners.

The most recent version of the Supplier Code of Conduct can also be found online at https://wackerneusongroup.com/en/sustainability

- **Whistleblower System "Tell-it"**

Via the external web-based whistleblower system „Tell-it " serious cases of violation or misconduct in connection with the Wacker Neuson Group such as human rights violations can be reported. The whistleblower system offers an additional line of communication, which is available both for the employees of the Wacker Neuson Group, as well as business partners, such as customers and suppliers. It can be accessed 24 hours a day from anywhere in the world and confidentially under the following link: www.bkms-system.net/wackerneuson

In light of the new German Supply Chain Due Diligence Act, a new category was added to the existing Tell-it whistleblowing system in order to be able to provide information on human rights in a more targeted manner in the future.

To ensure the protection of whistleblowers, the Wacker Neuson Group has implemented strategies aimed at preventing retaliation. A central component of these efforts is the newly developed Speak-Up Policy, which was adopted by the Executive Board and introduced in the fiscal year 2024.

This policy comprehensively defines all reporting channels, the responsible reporting office, the various types of reports, as well as the processes for handling the received reports. Furthermore, the prohibition of retaliation against whistleblowers is explicitly established. The Speak-Up Policy is also directed at external stakeholders and is publicly accessible on the company's website

- **Recruitment Policy and Practices**

Wacker Neuson UK undertakes right to work checks for all employees recruited in the UK to ensure they have a valid work visa if required and are of appropriate employment age. Wacker Neuson UK does not employ anyone below the legal school leaving age.

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Risk Assessment

Wacker Neuson's tool-based risk management system is designed to identify potential risks at an early stage, both in our own business operations and those of our suppliers.

The entire supply chain of Wacker Neuson Group is monitored using due diligence software from Osapiens. An automated message screening enables the identification of potential violations or risks in real-time. If critical cases are detected, an internal escalation is initiated as needed based on a defined escalation pyramid, which, in case of doubt, can reach the Executive Board level. If a supplier is unwilling to cooperate in remedying violations, corresponding consequences are taken up to the termination of the business relationship.

In our management process, we also take into account human rights criticism from third parties and information received. The reported risks are taken into account in a risk database and evaluated using a reporting system based on this. The measures are documented and lead from gross to net risk. In fiscal 2024, no cases of confirmed corruption were reported to the Compliance Committee by individuals in the organization. Similarly, no confirmed cases of corruption in the supply chain were reported.

Due Diligence

The principle of effectiveness, which results from the fundamental objective of the German Supply Chain Due Diligence Act (LkSG), aims to improve the international human rights situation.

In order to ensure the effectiveness and appropriateness of human rights due diligence processes within the Wacker Neuson Group (WNG), the effectiveness of the processes and measures is evaluated regularly, at least once per calendar year, as well as on an ad hoc basis, in order to avoid or minimise adverse effects on the people who are directly affected by the WNG's business activities in terms of human rights. This review is carried out by the Manager Supply Chain Due Diligence, who is supported by the Wacker Neuson Supply Chain Due Diligence Committee.

We review the effectiveness of measures in the WNG both in our own business operations and at suppliers by evaluating the results of our analysis of human rights risks and, where applicable, violations of human rights obligations and their impact. We also conduct risk-based audits, follow up on all reports of potential human rights violations and review the effectiveness of training measures by means of comprehension questions during the training or by means of final tests. We review the effectiveness of the complaint's procedure regularly, at least once a year, as well as on an ad hoc basis.

Where possible and appropriate, potentially affected parties or at least their representatives are involved in the design of the WNG's activities to ensure the adequacy and effectiveness of human rights due diligence processes. This approach ensures that the WNG continuously fulfils its responsibility with regard to human rights and environmental protection and actively contributes to promoting compliance with international standards.

As enshrined in the Company's Strategy 2022 and the Group's excellence goal, the Group is committed to ensuring that it only selects suitable suppliers. As a result, the Group's supplier audits for direct production materials focus in particular on potential new suppliers. The Supplier Development department, which is part of Quality Management, is responsible for this task. The department works independently in the different production sites and uses globally defined methods and tools to carry out audits in high-risk countries.

Supplier audits for direct production materials, known as "Supplier Potential Assessments", are carried out on the basis of Group-wide uniform evaluation standards. A central component of these



audits is the review of compliance with ESG criteria as well as the groupwide guidelines on human rights. A comprehensive KPI set for supply chain due diligence has been established, with quarterly reviews taking place. These include metrics for audits and complaints handling mechanisms, but do not yet explicitly consider stakeholder engagement. Vulnerable groups are currently recorded internally according to the processed cases in the control tool. A systematic identification and consideration of these groups are currently being further developed to better tailor future actions to their specific needs.
Raw material procurement is a critical area, as the materials needed for the production of machinery and construction vehicles come from various parts of the world. This means that the Group indirectly maintains business relationships with suppliers operating in countries with different environmental standards and working conditions. The selection of direct suppliers and the monitoring of compliance with sustainability criteria are therefore of increasing importance to ensure that raw material extraction and delivery do not have negative social or environmental impacts, as forced labour, child labour, or inadequate safety standards could occur, especially in high-risk regions. These risks are addressed through regular supplier audits, certification requirements, and long-term partnerships based on clear sustainability criteria.

The approach of the Wacker Neuson Group to consider the interests, views, rights, and expectations of affected employees in the value chain is based on several pillars. In the future, there will be a stronger focus on structured collaboration with Tier-1 suppliers. This collaboration aims to gather information on working conditions, social standards, as well as health and safety in the value chain. Additionally, the Wacker Neuson Group is guided by best practices and international frameworks, particularly the requirements of the Supply Chain Act (LkSG), to create a solid foundation for considering these interests. Despite these efforts, there are gaps in data collection for employees in the downstream activities of the value chain. These areas are often difficult to access as they lie outside our direct sphere of influence and reliable data has not yet been adequately available. To bridge this gap, the Wacker Neuson Group plans further actions in the coming years, including an expansion of data collection and monitoring mechanisms to ensure better integration of the interests of the employees in the downstream areas. In the course of the 2024 it was determined that there were no material risks or impacts related to downstream employees. The targeted further development of data collection mechanisms will help to consider the perspectives of the employees in downstream activities more strongly in the future.

Thanks to the application of specific monitoring mechanisms, it has been ensured that no violations of the established standards have been reported so far. However, should material weaknesses be identified with suppliers, direct collaboration with them will be undertaken to bring about sustainable enhancements of the situation.

In each production company as well as in spare parts purchasing and indirect purchasing, employees from the purchasing department, as key users, monitor the supply chain using the due diligence software Osapiens. In documented incidents, category buyers are involved in the communication with suppliers to jointly develop appropriate solutions. In the past fiscal year, there were two confirmed violations. Furthermore, investigations on potential cases of Uyghur forced labour are ongoing with upstream suppliers.

Within the UK, local procurement is carried out as defined at Group level. All decisions on whether to work with a UK based supplier are preceded by an appraisal of the suppliers with respect to their performance on factors like the environment, working conditions, and the protection of human rights. Local suppliers are made aware of Wacker Neuson UK's Modern Slavery Statement and of the Group Supplier Code of Conduct. Suppliers are audited as an ongoing process to identify those organisations which are required to produce their own modern slavery statement and copies of these are obtained where appropriate. For suppliers that fall below the threshold requiring a modern slavery statement, they are issued with a declaration to confirm their commitment to combat modern slavery within their own business and supply chains.

In the fiscal year 2024, Wacker Neuson Group conducted comprehensive audits to verify compliance with human rights standards along their value chain. Ten audits were carried out with potential suppliers in Europe and China. Additionally, three audits were conducted with existing suppliers. Besides the traditional quality and delivery requirements, particular emphasis was placed on working



conditions and compliance with human rights regulations. Fortunately, the reviews revealed no indications of violations of human rights standards, neither in the year 2024 nor in the previous year. At the organisational level, the Corporate Compliance Office recorded no complaints or suspected cases related to human rights issues within the Group in the fiscal year 2024.

In 2024, Wacker Neuson UK neither received complaints about violations of human rights or suspected violations of human rights in the organisation nor such complaints about suppliers with existing business relationships.

Training

In 2024, the Wacker Neuson Group developed a comprehensive manual covering regulatory requirements such including the requirements of LkSG, and other regulations. This manual supports employees in procurement to identify potential risks early and take targeted actions to mitigate risks.

Employees and executives involved in the implementation of the policies are regularly briefed and trained through trainings and internal communication. Targeted training takes place for employees in procurement. Further actions include the completion of all e-learnings sent to suppliers on LkSG topics and the conduct of Supplier Potential Assessments (SPA), if these are necessary in the course of the risk analysis. In addition, long-term trainings for all employees of the Wacker Neuson Group who are actively involved in the implementation of due diligence processes will be introduced to strengthen their awareness of human rights risks.

The HR Officer in the UK and members of the spare parts procurement team have attended a series of online briefings and workshops provided by the Supply Chain Sustainability School (SCSC) focussing specifically on modern slavery within the construction industry. The HR Officer also attended a Conference organised by the SCSC entitled 'Built Environment Against Slavery: Insights, Actions and Collaboration'.

A briefing document has been issued to all staff within the UK to raise awareness and ensure a better understanding of the issue. This includes information on the appropriate action to take if they encounter anything that raises concerns.

Stafford, on 7 May 2025

Andy Williams
Managing Director

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