

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as (but limited to) slavery, servitude, forced and compulsory labour and human trafficking. These all result in the deprivation of a person's liberty by another, in order to exploit that individual or individuals for personal or commercial gain.

Leica Geosystems Ltd has a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings. Leica Geosystems Ltd commit to auditing our operations and working systems to prevent modern slavery within our activities and those of our supply chain.

All business details of the Company shall be transparent and will comply with any disclosure obligations contained within the Modern Slavery Act 2015.

Scope

This policy statement applies to:

1. All Company business operations for the purpose of the supply, hire, repair, service, and calibration of surveying equipment to its customers.
2. All business operations pertaining to the procurement of services & products from its business partners/suppliers.
3. All business operations pertaining to the engagement of personnel for the purpose of carrying out Company business operations.

Definitions

"Company" shall mean Leica Geosystems Ltd

"RD" shall mean Regional Director UK

"Management Team" shall mean the Regional Director UK and such other senior personnel deemed applicable by the RD.

Responsibilities

The Regional Director UK has responsibility for the prevention of modern slavery within the business.

The Regional Director UK has overall responsibility for the implementation & compliance with the contents of this policy but may delegate functions of compliance to suitable senior management personnel.

All Leica Geosystems personnel must partake in the prevention, detection, and reporting of bribery and/or other forms of corruption.

All Leica Geosystems personnel are required to avoid any activity which might lead to a breach of this policy (and refer it to the Management Team).

MODERN SLAVERY POLICY

Policy Reference:	002.14.PL.2022
Revision No:	4
Revision Date:	06.06.2025
Date of Review:	05.06.2026
Reviewed by:	Roz Wankling
Approved by:	Kevin Smith

Policy Aim & Commitments

Company Commitment:

The Company is committed to:

- Act in a manner which is fair & transparent within its business dealings.
- Operate in a manner which adheres to all legal obligations (such as the Modern Slavery Act 2015), ethical standards and fundamental human rights set out by the principles of the International Labour Organisations & UN Guiding Principles on Business & Human Rights
https://www.ohchr.org/documents/publications/GuidingprinciplesBusinesshr_eN.pdf
- Work with its employees, supply chain, and partners to raise awareness & ensure adherence to acceptable codes of practice (that are compliant with all current and relevant legislation and standards).
- Communicate the Company commitment via appropriate channels.
- Strictly address and directly prohibit any and all practices that are known or ought reasonably to be known to contribute to the risk of modern slavery.
- Promote a collective commitment to good working practices.
- No Leica Geosystems personnel will suffer detriment or unfavourable treatment for reporting genuine concerns for investigation in accordance with this policy.

Staff Commitment

All Leica Geosystems personnel are required to read, understand, and comply with this policy.

Act in accordance with Leica Geosystems procurement policies, anti-bribery, and corruption policies.

Personnel are responsible for reporting suspected:

- conflicts
- suspicious activities
- suspicious treatment or dealings
- coercive behaviours
- abusive or exploitative behaviour which may amount to slavery within our Company business operations (as set out in the "Scope" section) to Leica Geosystems Management.

Personnel are encouraged to raise any concerns, even when unsure, as soon as possible.

If you believe that you have personally suffered any treatment set out in this policy, you must report this to your line manager and formally raise the matter using the Leica Geosystems formal Grievance procedure as set out in your contract of employment. This is also available on request.

Leica Geosystems operate a zero-tolerance approach to modern slavery.

All personnel are responsible for ensuring this zero-tolerance approach is clearly communicated to our business partners at the outset of any business relationship and is re-enforced as appropriate thereafter.

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What is Modern Slavery?

What does modern slavery look like? Slavery is more likely (but not exclusively) to happen where the rule of law is weaker. Someone is in slavery if they are:

- Forced to work, through coercion, or mental or physical treat.
- Owned or controlled by an employer through mental or physical abuse or the threat of abuse.
- Dehumanised, treated as a commodity or bought and sold as “property”.
- Physically constrained or have restrictions placed on their freedom of movement.

Here are the most common forms of modern slavery:

- Forced Labour: any work or services which people are forced to do against their will under the threat of some form of punishment.
- Debt Bondage (or bonded labour): the world's most widespread form of slavery. When people borrow money that they cannot repay and are required to work to pay off their debt, then losing control over the conditions of both their employment and the debt.
- Human Trafficking: involves transporting, recruiting, or harbouring people for the purpose of exploitation, using violence, threats, or coercion.
- Descent based slavery: where people are born into slavery because their ancestors were captured and enslaved; they remain in slavery by descent.
- Child Slavery: occurs when a child is exploited for someone else's gain.

The Company has considered its operational risks (in the context of this policy) and does not feel it is subject to any identifiable high-risk areas within its operations.

Implementation of policy & assessment of risk

The Regional Director UK has responsibility for the prevention of modern slavery within the business.

The Regional Director UK has overall responsibility for the implementation & compliance with the contents of this policy but may delegate functions of compliance to suitable Senior Management personnel.

This policy has been created to raise awareness of risk and provide a framework for identifying those risks within its business operations and within its supply chain.

The policy will be reviewed, and subsequent revisions circulated to all personnel.

Any communications pertaining to identified risks will also be circulated to all relevant personnel.

Any relevant updates on the identification and reporting of slavery will be circulated to all personnel as necessary.

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Reporting Suspected Slavery

The Senior Management Team is committed to creating an environment in which personnel feel able to raise genuine concerns in good faith without the fear of disciplinary action being taken against them (even if their concerns turn out to be mistaken).

Personnel with knowledge of slavery in any form should not remain silent.

Personnel shall not suffer detrimental treatment as a result of refusing to take part in activity which they believe may be construed as actual or potential bribery or other offence. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a legitimate concern.

All concerns must be escalated to the Senior Management Team in writing.

If you suspect a person may be subject to trafficking and/or slavery abuse, you can also report it:

- Call dedicated helpline: 08000 121 700
- Call the Salvation Modern Slavery Human Trafficking Helpline: 0300 303 8151
- Use website www.modernslaveryhelpline.org

Wherever slavery practices have been identified within its operations the Company will take appropriate legal action under the guidance of Company solicitors for the immediate rectification of the identified infringement.

Wherever slavery practices have been identified within the Company supply chain the Company will suspend the approved supplier status of the offending party and will (collaboratively where possible) carry out a suitable investigation of the supplier, practices under the guidance of Company solicitors.

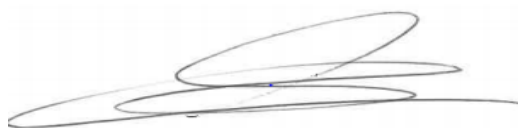
Compliance & Review

The Senior Management Team will be responsible for managing the compliance of all personnel with the remit of this policy.

The Senior Management Team are responsible for the suitable review of the remit of this policy and appropriateness of its content to Company business operations and practices.

All Leica Geosystems personnel are responsible for working as trained and in accordance with this policy and issued working instructions.

Signed:



Print name: Kevin Smith

Position: Regional Director UK

Revision No: 4

Date: 5th June 2026

Next review: 4th June 2027