

SWISSPEARL

Swisspearl Group UK Modern Slavery Statement



Contents

Introduction..... 3

Organisation and supply chain..... 3

Our policies related to Modern Slavery..... 3

Due diligence 4

Own operations..... 4

Supply chain 4

Due diligence results and management of risks..... 5

Risk screening, assessment and mitigation..... 5

Outcome of the supply chain due diligence 6

Approval 6

Introduction

This statement has been published in accordance with §54 of the 2015 UK Modern Slavery Act. The statement is an overview of the policies and processes that Swisspearl Group AG has established to ensure that modern slavery and human trafficking is not taking place within our business and our supply chain.

At Swisspearl we recognise our responsibility in respect to international human and labor rights, including abolition of modern slavery and human trafficking. We strive to promote a working environment characterised by respect, fairness, equality, and where fundamental employee rights are protected and promoted. Further, we want to uphold our reputation as a company with a high level of integrity and trustworthiness, and to deliver a fair, respectable, equal and safe Swisspearl for all our stakeholders.

Organisation and supply chain

Swisspearl is a leading manufacturer and supplier of fiber-cement-based building materials. The heart of the success of our products began as early as 1894 in Vöcklabruck, Austria, where fiber-cement was invented by Ludwig Hatschek. Today our products for building envelope cover façade, roofing, sub-construction and interior applications. In addition we have a range of garden products.

The Swisspearl Group AG headquarters are in Switzerland. The Group is active across Europe with 9 factories and 15 sales offices. Raw materials to the factories are sourced via a global supply network. Swisspearl accesses the global markets through logistics set up that includes direct deliveries from factories as well as distribution via our market warehouses in several European countries.

As a leading pan-European manufacturer and distributor of fiber-cement based products, we work with partners and suppliers who operate in various legal and cultural contexts throughout the world. However, we always strive to find and work with partners who conduct themselves in ways consistent with our own values and standards.

Our policies related to Modern Slavery

Our human rights approach takes its point of departure from the International Bill of Human Rights and the International Labour Organisation's (ILO) eight core Conventions, including the Declaration on Fundamental Principles and Rights at Work. Consequently, we have the following internal policies, codes of conduct and systems in place reflecting our commitment to respect human rights and combat modern slavery in all parts of our business. All of the following policies, codes and systems are available to all staff in Swisspearl website and/or our intranet. The relevant policies supporting this statement are:

- Code of Conduct
- Supplier Code of Conduct
- Human Rights Policy
- Whistleblowing Policy

We respect and promote all human rights, but we also devote special attention to areas of our business, where we are in danger of having an adverse impact on human rights. To that end, we are committed to conduct our business in alignment with the UN Guiding Principles on Business and Human Rights. This means that we are committed to continuously work on:

- Identifying our human rights risks,
- Developing means to manage adverse impacts,
- Monitoring our performance,
- Providing access to remedy, and
- Communicating our efforts.

Due diligence

We have the processes and procedures in place to ensure that slavery and human trafficking risks are identified, assessed and addressed:

- We seek to ensure that we do not inadvertently support modern slavery. We have Code of Conduct, Supplier Code of Conduct and Human Rights Policy in place to encourage ethical and good practice.
- To support transparency and encourage employees or third parties who identify a potential or actual violation of these commitments or requirements, we ask them to file an anonymous report in our whistleblowing channel, available on our web-sites.

Own operations

- As part of introduction of new employees, we introduce the Code of Conduct
- In our recruitment process, we ensure that staff are legally entitled to work in the country we employ them. When using external recruitment partners, we expect them to ensure the legal entitlement of candidates.
- In new and renewed employment contracts we refer to local laws and regulations where relevant to ensure both parties the solid foundation of the employment with us.

Supply chain

- We introduce Supplier Code of Conduct to our suppliers in a prioritized manner, starting from the strategic, large suppliers and/or those located in countries with elevated ESG risks
- We run a prioritized supply chain due diligence, including
 - Risk screening through dedicated system; Responsibly platform offers advanced tools and methodologies to ensure a comprehensive and robust assessment process:
 - Data aggregation from multiple global sources
 - Risk assessment for procurement countries and regions through AI-driven models to evaluate risk levels.

- Ongoing monitoring automatically to adapt to risks and regulatory changes in a timely and efficient manner
- News & media monitoring to track especially business ethics and environment related developments, allegations, incidents and violations relevant to Swisspearl's supplier base in a validated manner by cross-referencing public reports with internal supplier data and certifications
- Conducting sustainability self-assessment questionnaires to selected suppliers
- Based on the gathered information, initiating additional questions and potentially conducting audit visits to sites of high-risk suppliers

Due diligence results and management of risks

This section covers the results of the due diligence regarding the supply chain in respect to human rights and decent working conditions, including forced labor and human trafficking.

During the financial year 2025, Swisspearl has implemented and continued to apply its due diligence processes to identify, assess and address risks related to modern slavery and human trafficking in its own operations and supply chain.

Risk screening, assessment and mitigation

Swisspearl conducts a screening of its supplier base, including all material suppliers and relevant service suppliers, through an external due diligence platform Responsibly, which assesses suppliers across multiple risk dimensions.

In addition to platform-based screening, Swisspearl conducts due diligence through:

- Supplier self-assessment questionnaires (SAQs)
- Site visits for selected suppliers
- Direct engagement and follow-up activities with suppliers

For service suppliers, an initial pre-screening is conducted to determine relevance for inclusion in the due diligence system. As an outcome of this approach, suppliers identified in countries with elevated human rights risks are prioritised for continuous monitoring and further due diligence, while suppliers without such risk indicators are not included in ongoing monitoring.

The Responsibly platform offers advanced tools and methodologies to ensure a comprehensive and robust assessment process..

Adverse impacts

Swisspearl has conducted the screening and assessment of all of its material suppliers as well as service suppliers in high-risk countries. Based on supplier screening, self-assessment questionnaires, site visits, and supplier engagement activities, no indications of adverse impacts regarding human rights and decent working conditions have been identified based on the applied due diligence processes.

Risks

Nevertheless, during 2025 Swisspearl has expanded the coverage of companies and risk parameters in the due diligence. Based on country and industry risks as well as media and incident search, a status indicator was evaluated for each parameter. All in all this consisted of 22 140 observations across all companies and respective human rights parameters covered.

Analysis of the risk observations concludes that no high risks were identified. The assessment of potential risks evidences that 97 % of all observations regarding human rights and decent working conditions are in categories Low/no risks as well as All risks and incidents managed. Therefore, it is concluded that the potential for human rights and decent working conditions risks is low based on available evidence and applied due diligence methodologies.

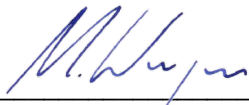
Outcome of the supply chain due diligence

Based on the applied due diligence processes, Swisspearl has not identified any confirmed adverse impacts related to modern slavery or human trafficking in its own operations or supply chain.

However, given the nature of global supply chains and the limitations inherent in risk-based due diligence methodologies, the existence of undetected risks cannot be fully excluded. Swisspearl will continue to monitor and assess potential risks as part of its ongoing due diligence processes.

Approval

This statement has been approved by the Swisspearl Group AG Supervisory Board.



Marco Wenger, Group CEO

15th June 2026