28 May 2025

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015.

Enhesa is a trusted partner to drive the transformation of compliance and sustainability.

We're top solutions coming together as the leading provider of regulatory and sustainability intelligence worldwide. An integrated global business on a mission to make a difference – and to empower you to make our world a more sustainable place.

Enhesa Group N. V. (hereinafter, "Enhesa") respects and promotes human rights, and through its business and operations, seeks to actively contribute to a more prosperous, equitable and fair society.

This statement covers the activities of the whole Enhesa Group, for the financial year running from January 2024 to December 2024.

Our Organization's Structure, Our Business, and Our Supply Chain

Enhesa Group comprises Enhesa N. V., which is the parent company of Enhesa Inc. in the US, Enhesa Kabushiki Kaisha in Japan, Enhesa (Shanghai) co. (China) Ltd., and CW Research Limited in England.

Enhesa Inc. has as subsidiaries Scivera LLC, Timberlake Ventures Inc., and Reg Scan LLC. Enhesa, N.V. has an office in Belgium and a branch in Portugal. Enhesa Inc. has offices in the US and one in Canada.

Our core activities are providing intelligence to multinationals and enabling them to be compliant no matter how simple or complex their operations. We enable them with intelligence for their operations, products, processes, and chemicals management across the globe.

Enhesa's solutions include EHS intelligence, Product intelligence, Sustainable Chemistry, and Corporate Sustainability. These help companies address regulatory and sustainability challenges in a global landscape. Regscan by Enhesa provides a vast regulatory library for compliance programs for mid-market companies in the US.

Our expertise means that we can guide organizations through the ever-changing landscape of operational compliance, product regulations, and chemical sustainability so you can ensure the safety of your employees, consumers, communities, and the environment.

In this context, Enhesa's supply chain is integrated by service suppliers and some goods suppliers. Specially subcontractors in the case of service suppliers.

Our Journey and Our Policies:

Enhesa has the following policies related to respecting Human Rights and to prevent any modern slavery issues. Modern slavery understood as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation:

- Human Rights Policy: applicable to all Enhesa Group and through its business operations. The policy is based on international instruments, such as the Guiding Principles for Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework (UN) and the Forced Labor Convention (International Labor Organization - ILO).

- Sustainability and ESG Policy: Which outlines our commitment to the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

- Sustainable Procurement Policy: Which enables buyers within the Enhesa Group to select suppliers which are aligned with our values and commitments such as respecting human rights, good labour practices, and not tolerating any form of modern slavery. This policy also provides the basis for buyers to conduct reasonable due diligence.

- Recruitment Policy: which respects human rights of candidates and prohibits recruiting any person below the legal age to work.

- Global Whistleblowing Procedure: which allows any employee and stakeholder of Enhesa group to raise concerns, such as human rights violations.

- Supplier and Business Partner Code of Conduct: which requires among others for Business partners and suppliers to respect all internationally recognized human rights as set out in the Universal Declaration of Human Rights. They shall not use, promote or allow forced labour in any form, including human trafficking or modern slavery practices and they shall implement due diligence procedures to help identify, prevent and mitigate any instances of modern slavery within their value chain.

Knowing Our Value Chain and the Most Vulnerable Parts Presenting Higher Risks and Enhesa's response

Enhesa's supply chain includes service providers and good suppliers.

We understand that there are sectors and countries with a higher risk of exposure than those where we operate Belgium, Canada, China, Japan, Portugal, UK, and US. Even if we operate in countries and a sector with lower risk, according to the Global Slavery Index (https://www.walkfree.org/global-slavery-index/), we acknowledge we also have a part to play.

According to the Human Rights Guidance tool for investment, the services sector comprising professional services has a wide variety of risks. The main risks can include low wages and long hours; substantial use of migrant workers; trafficking of workers, especially women and children, who are then forced to work.

As part of our actions, we make use of various sources to understand the risks and be able to identify prevent, mitigate, and provide remedy where possible.

Enhesa has developed the Sustainable Procurement Practice Policy which enables Enhesa to conduct **due diligence** on (tier 1) suppliers by searching in the *Database of specific instances* from the Organisation for Economic Co-operation and Development (OECD) for any pending instance for failing to conduct responsible business in accordance with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct by the supplier. We understand this is the beginning of a continuous improvement.

It is important to acknowledge that the due diligence has to be proportional to the business, operational context, and sector and that is Enhesa approach as explained in this section.

Our Performance Indicators and their Effectiveness

There are four main actions conducted for year 2024 and its key performance indicators:

- keeping track of incidents or complaints of modern slavery and treating the complaints (KPI: number of incidents or complaints of modern slavery and treatment of these)

- conducting a vendor analysis for Y2024 to understand our tier 1 suppliers and whether they are in an area of modern slavery prevalence (KPI: vendor analysis for Y2024)

- keeping track of the number of vendors listed with an instance in the Database of specific instances of the OECD (KPI: number of vendors listed with an instance and engaging with them if listed)

- Incorporation of our Suppliers and Code of Conduct into partners agreements and vendors

Keeping track of incidents or complaints of modern slavery and carrying out an investigation of the complaints

With the issuance of the Whistleblowing procedure Enhesa has put at disposal of any person the contact numbers to report in case of serious concern related to human rights violations (including modern slavery).

For the year 2024, no case of modern slavery has been registered.

Conducting a vendor analysis for Y2024 to understand our tier 1 suppliers and whether they are in area of modern slavery prevalence (KPI: vendor analysis for Y2024)

We have conducted a vendor analysis for the year 2024. We looked at the transactions and amount in 2024 per vendor, and we used the vendor location to determine the prevalence based on the available Global Slavery Index. We have also based our analysis taking in consideration that product category, since there are certain product categories that are considered as high risk.

The results show that:

- Enhesa's suppliers are in countries with low prevalence of modern slavery.
- Very few transactions with countries with higher modern slavery prevalence rate. The transactions in countries with high prevalence were analyzed further and the transaction is related to individuals lending their professional services to Enhesa or to a subscription to the official journal. This is expected due to the nature of our activities; we use

professional services and we also contract subscriptions to official journals in order to develop the content for our customers.

- One of the categories of products at risk of modern slavery in their supply chains is electronics, according to Walk Free; however, Enhesa has a very low risk exposure considering the amount spent on this category is extremely low compared the total spend.

Keeping track of the number of vendors listed with an instance in the Database of specific instances of the OECD (KPI: number of vendors listed with an instance)

Lastly, the Sustainable Procurement Policy and its mechanism to conduct reasonable and proportionate due diligence has allowed us to check new vendors (new vendors are those registered within our internal service from 1 June to 31 December 2024) to see if they are subject to a specific instance in the *Database of specific instances* from the Organization for Economic Co-operation and Development (OECD). None of the vendors checked has an instance in the mentioned database.

The reason for tracking this is to identify vendors with a specific instance (a non-observance of the OECD Guidelines which includes respect to human rights) and determine the next steps to have meaningful engagement with vendors in such cases.

Incorporation of our Suppliers and Business Partner Code of Conduct into partners agreements and vendors contracting process

We have incorporated our Suppliers and Business Partners Code of Conduct into partners agreements. For our vendors, we included it as part of the contracting process vendors have to acknowledge our Suppliers and Business Partners Code of Conduct. This was an action we identify last year and for efficiency reasons we decided to include the acceptance of the referred code in the mentioned ways.

Next Steps

In the coming years, we are planning to:

- provide training on human rights and modern slavery;
- collecting the number of suppliers that have controls in place; and
- strengthen our due diligence across our value chain.

Approved by