

Luware UK Limited Modern Slavery Statement

This Statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the efforts that Luware UK Limited (Luware UK) and its affiliates (Luware) have taken to ensure that modern slavery and human trafficking does not take place in its supply chain or any part of business operations.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Luware does not tolerate any form of modern slavery. We are committed to acting ethically, with integrity and transparency in our business dealings, and to putting effective systems and controls in place to safeguard against any form of modern slavery and human trafficking taking place within our business or our supply chain.

1. Our business

Luware UK Limited is a private limited company registered in England and Wales. It is affiliated with Luware AG, Luware Deutschland GmbH, Luware Poland Sp. z o.o. and Luware US Inc. Luware UK and its affiliates are wholly owned by Luware Holding AG.

Luware offers a suite of integrated solutions based on Microsoft stack. Luware Nimbus, our Contact Center as a Service ('CCaaS') solution, enhances Microsoft Teams by adding essential contact center functionalities, including intelligent task routing, for efficient management of customer inquiries. Luware Recording complements this offering with a fully managed cloud recording solution, ensuring organizations can fully utilize modern communication channels while maintaining compliance.

As a dedicated Microsoft Partner, Luware is committed to enhancing Microsoft technologies and maximizing organizations' return on their Microsoft investments.

We do not manufacture any hardware.

2. Our supply chain and due diligence process

We partner with software vendors, mainly based in Switzerland, Germany, the UK and the US. We do not have complex supply chains or obtain services from suppliers with a high risk of slavery or human trafficking. Given the nature and locations of our business, we consider ourselves to be at low risk of the potential for slavery or trafficking. Furthermore, our revenues are predominantly derived from countries deemed low risk by conventional sustainability indices, such as The Global Slavery Index ([Global Slavery Index | Walk Free](#)).

We have adopted a risk-based approach to review existing suppliers and will adopt this approach for any new supplier with which we contract. If the analysis of the extent of the relevant risks changes, then this will be revisited.

We have developed and shared with our direct suppliers a Supplier Code of Conduct which addresses the labour rights issues associated with modern slavery and sets out the values and standards we expect of our suppliers. We will ensure, where applicable, that our suppliers are contractually obliged to comply with all applicable laws that apply to their supply of goods and services to us, regardless of the country in which they operate.

3. Policies

We are committed to investigating each case of non-compliance with modern slavery regulation on a case-by-case basis. Luware has implemented and made available to all staff a number of policies and procedures, including Whistleblowing Policy, Human Rights and Labour Rights Policy, Supplier Code of Conduct and Employee Code of Conduct, all relevant to monitoring and mitigating the risk of non-compliance within our business or its supply chains as well as being in compliance with the laws and regulations applicable to our

business. All relevant suppliers are expected to comply with our Supplier Code of Conduct. Our Employee Code of Conduct requires all employees to act ethically, to comply with the law at all times, to respect our values, especially to act with integrity as well as transparency and to treat each other with respect and appreciation.

4. Training

We continue to identify training needs within Luware to ensure that the relevant parts of the company have awareness about slavery and human trafficking, and how that could affect the company's supply chains.

5. Approval

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and pertains to the financial year ending 31 December 2024. It has been approved by the Board of Directors of Luware Holding AG on 15 April 2025.

Zurich, 15 April 2025

A handwritten signature in black ink, appearing to read 'K. Strub', written over a horizontal line.

Karel Strub, Chairman

A handwritten signature in black ink, appearing to read 'Michael Jakob', written over a horizontal line.

Michael Jakob, Board Member and CTO