



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 during the reporting period to prevent modern slavery and human trafficking in our business operations and supply chains, and the actions we continue to take to strengthen our approach.

Modern slavery includes slavery, servitude, forced and compulsory labour, and human trafficking. Luware has a zero-tolerance approach to modern slavery in all its forms. We are committed to conducting our business ethically, transparently and with integrity. We seek to implement and maintain effective systems and controls to mitigate the risk of modern slavery occurring within our own operations or within our supply chain.

Although we operate in a sector that is generally considered lower risk for modern slavery compared to manufacturing or extractive industries, we recognise that risks can arise in any global supply chain. We therefore remain vigilant and committed to responsible business practices.

We expect the same high standards from our employees, contractors, suppliers and business partners, and we continue to work collaboratively to promote transparency, accountability and responsible business practices across our value 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.

Luware does not manufacture any hardware.

2 Our supply chain and due diligence process

As a technology company, our supply chain primarily consists of software vendors and is relatively limited in scope. It is largely concentrated in developed jurisdictions with established labour protections, including Switzerland, Germany, the United Kingdom and the United States.

We do not operate complex supply chains or source from high-risk sectors. Given the nature and location of our operations, we assess our exposure to modern slavery and human trafficking risks as low. Our revenues

are also predominantly generated in countries considered low risk by recognised sustainability benchmarks, including the [Global Slavery Index | Walk Free](#).

Nonetheless, we take proportionate measures to:

- Conduct due diligence on key suppliers and partners
- Assess geographic and sector risk during onboarding vendors
- Periodically review supplier relationships, where appropriate
- Incorporate contractual obligations requiring compliance with all applicable laws, particularly modern slavery and human rights legislation
- Require direct suppliers to adhere to our Supplier Code of Conduct, which addresses labour rights risks associated with modern slavery and sets out the standards and values we expect them to uphold

3 Policies

Luware has implemented and made available to all employees a comprehensive framework of policies and procedures designed to promote ethical conduct and mitigate the risk of modern slavery and other forms of non-compliance within our business and supply chains. These include an Employee Code of Conduct, a Whistleblowing Policy enabling the confidential reporting of concerns, a Human Rights and Labour Rights Policy. Together, these policies establish clear standards of behaviour and support compliance with all applicable laws and regulations relevant to our operations.

Our Employee Code of Conduct requires all employees to act lawfully, ethically and in alignment with our corporate values. In particular, employees are expected to conduct business with integrity and transparency, and to treat colleagues, customers and partners with dignity, fairness and respect.

We expect all suppliers and business partners to operate in accordance with applicable local and international laws and regulatory requirements, including labour and employment legislation in the jurisdictions in which they operate. Suppliers are also required to adhere to our Supplier Code of Conduct, which sets out our expectations in relation to human rights, fair working conditions and ethical business practices.

We are committed to taking all concerns relating to modern slavery seriously. Any suspected or identified instances of non-compliance are assessed and investigated appropriately, with action taken on a case-by-case basis in line with our internal policies and applicable legal requirements.

4 Training

We actively foster a culture of integrity by promoting high ethical standards and responsible business practices across the organisation. We regularly assess and address training requirements within Luware to ensure that relevant teams understand the risks of modern slavery and human trafficking, and how these issues may impact our operations and supply chains.

5 Ongoing Commitment

We are committed to continuously reviewing and strengthening our policies, procedures and risk management processes to ensure they remain effective and proportionate to the size and nature of our business.

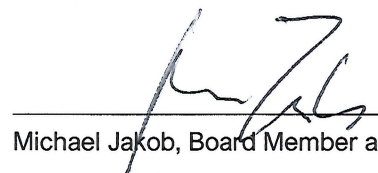
6 Approval

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 2025. It has been approved by the Board of Directors of Luware Holding AG on 16 April 2026.

Zurich, 16 April 2026



Karel Strub, Chairman of the Board



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