



## **Modern Slavery Act Statement**

### **Year ended 30 September 2024**

This statement fulfils the obligation set out in Section 54 of the Modern Slavery Act 2015 and is made by each of the four companies listed at the end of the statement. Each of the four companies is a member of the Carl Zeiss AG group of companies ("ZEISS"). This statement details the steps that ZEISS has taken between 1 October 2023 and 30 September 2024 to mitigate and prevent modern slavery risk within our business operations and supply chains.

ZEISS is committed to the principles of the Modern Slavery Act and the abolition of modern slavery and human trafficking. We do not tolerate any form of forced labour, slavery or similar practices, modern forms of slavery, human trafficking, servitude or other forms of domination or oppression in our business or our supply chain.

### **Our organisation, its business and supply chains**

The ZEISS group of companies is owned by the Carl Zeiss Foundation. More than 125 years ago, the Statute of the Carl Zeiss Foundation established the commitment to responsible corporate governance in a visionary manner. Since then, the ZEISS foundation company has grown to become a leading global technology company. Aware of the responsibility this entails, we are committed to respecting human rights and promoting environmental and climate protection as an integral part of our business activities, both in our own business and in our supply chains.

ZEISS is a global technology company and operates through four areas known as Business Segments:

- Semiconductor Manufacturing Technology
- Industrial Quality and Research
- Medical Technology
- Consumer Markets

These business segments each report to a designated member of the Executive Board of Carl Zeiss AG. The companies covered by this report represent the Industrial Quality and Research, Medical Technology and Consumer Markets business segments in the UK and are fully integrated into the group reporting structures. ZEISS is headquartered in Oberkochen (Baden-Württemberg, Germany). As of September 2024, the Group employs 46,485 people around the world, is represented in around 50 countries and reported revenue of €10.9bn for the year then ended.



The ZEISS Group is one of the world's leading technology companies. It has an innovative portfolio that is geared towards future-oriented markets in optics, precision mechanics and optoelectronics. As a global organisation, it has both internal and external supply chains which stretch around the world. The companies covered by this report each have their own part in these supply chains and have assessed the risks relating to modern slavery which might occur in them. Their suppliers are based predominantly in Europe, in USA and Mexico in North America, and in China in Asia, and include established international freight forwarders which enable ZEISS to operate with such a global reach.

### **Our policies in relation to the Modern Slavery Act**

The ZEISS Group operates according to a fundamental culture of "doing the right thing". This is established through a Compliance Management System (CMS), designed to ensure that the Group conducts its operations in a lawful and ethically sound manner, serving as the foundation for sustainable economic success. The CMS is overseen by the Group's Executive Board, which holds the management of each ZEISS entity accountable for creating suitable organizational and governance frameworks, as well as developing policies, procedures, leadership, and training to meet these objectives. The CMS undergoes regular reviews and updates, with the latest revision in 2022.

The following policies are available to all staff:

- Bullying and Harassment Policy
- Code of Conduct – also online at [www.zeiss.com/compliance/en/home.html](http://www.zeiss.com/compliance/en/home.html)
- Equality Diversity and Inclusion Policy
- Recruitment Policy
- Whistleblowing Policy

Further information may also be found at:

[www.zeiss.com/corporate/en/about-zeiss/present/sustainability/common-good.html](http://www.zeiss.com/corporate/en/about-zeiss/present/sustainability/common-good.html)

### **Our due diligence processes in relation to slavery and human trafficking**

ZEISS has a risk management system in place. This defines uniform rules and processes for the early identification, assessment and management of risks for its own business area and the supply chain. Risk coordinators in the various business units support the management responsible in each case in implementing central requirements and guidelines.



To ensure effective implementation and continuous development of human rights and environmental due diligence requirements and processes after the German Act on Corporate Due Diligence in Supply Chains came into force in 2023, the Group's Executive Board has appointed a Human Rights Officer to monitor the risk management regarding human rights and environment-related risks. The Human Rights Officer is integrated in the compliance and reporting processes of the ZEISS Group and maintains a close exchange with the business units. Management of the respective ZEISS Group business unit is responsible for identifying, managing and reporting human rights and environment-related risks.

At least once a year and on an ad hoc basis, the Human Rights Officer reports the results of the risk analysis and findings from the review of complaints received. Information on the effectiveness of due diligence processes under the German Act on Corporate Due Diligence in Supply Chains is reported to the Executive Board.

### **Where there is a risk of slavery and human trafficking**

ZEISS performs an annual risk analysis and assessment both for its own business area and for its direct suppliers. In addition, event-driven risk analyses are carried out in response to substantiated knowledge and a changed risk situation, with indirect suppliers also being considered.

ZEISS uses a staggered procedure for this purpose. To identify risks, external data sources, mainly country-specific indices, are first used to determine whether abstract human rights and environmental risks exist in the company's own business operations or at suppliers. Industry and business purpose specific risks are also considered. In a second step, information to which ZEISS has access, either in a tool or on a case-by-case basis, is added as part of a concrete risk analysis, and the results are evaluated in an overall assessment. The identified net risks are then prioritized.

For its own business area, the Group companies under direct control are evaluated. In addition to business activity, reason for the contribution and impact, ZEISS includes other internal indicators in the process to obtain a basis for the specific assessment of risks. The identified risks are then evaluated based on severity, probability of occurrence and reversibility for each individual company with an increased risk to determine medium and high net risks, which continue to exist even if appropriate preventive measures are in place.

As a result of this overall process, risks in the areas of occupational health and safety and environmental protection have been classified as requiring monitoring in some countries.

For direct suppliers, it is also important to analyse the results in greater depth as part of the specific risk analysis using available information such as potential influence, sales volume and complexity, and to prioritize them on this basis. The prioritized suppliers are monitored using one of the tools available.



As a manufacturing technology company with international sites and many suppliers, risks regarding working conditions and environmental protection must be considered. ZEISS also sees a particular challenge regarding transparency and traceability in the supply chain. The company is therefore continuously working on further improving and systematizing the data situation. ZEISS takes appropriate preventive and remedial measures to avoid, eliminate or minimize risks in its own business area or those of its suppliers. In this context, ZEISS builds on long-established processes and structures from risk management in its own business area and supplier management in the purchasing areas.

All ZEISS employees are required to comply with the ZEISS Code of Conduct and the additional topic-related corporate guidelines. As part of ZEISS Compliance Management, mandatory training courses are held regularly at the ZEISS companies to raise employees' awareness of the contents of the Code of Conduct. Training courses that provide specific knowledge for effective implementation of human rights and environmental due diligence processes are also offered.

Furthermore, binding instructions apply throughout the Group at ZEISS; these are intended to ensure occupational health and safety for employees through standardized and audited processes. Many Group companies maintain a certified management system – for example in accordance with ISO 14001 (environmental management system) or ISO 45001 (management systems for occupational safety and health) – and are audited on this basis by external organizations. Irrespective of certification, ZEISS pursues a risk-based approach in monitoring its units and sites and, as part of this, carries out internal audits and internal reviews.

As part of the supplier selection process, suppliers at ZEISS undergo a comprehensive clearance check before a business relationship starts. This also includes and takes due account of criteria concerning human rights and environmental standards. The profile is then regularly updated and reviewed. Based on the identified and prioritized risks, suppliers are informed and trained as appropriate. ZEISS reserves the right to carry out risk-based control procedures such as on-site audits. Supplier companies are required, based on contractual assurances, to comply with ZEISS' human rights and environmental requirements and, to propagate the same along their own supply chain and to cooperate in the implementation of preventive and remedial measures.

ZEISS requires its suppliers to comply with the Responsible Business Alliance (RBA) Code of Conduct. This sets out standards for human rights, health and safety, environmental protection and business ethics that are based on international agreements. The ZEISS Group's Supplier Standards that were defined in the context of the German Supply Chain Act in 2023 set out human rights and environmental requirements for suppliers and their obligations to cooperate. They go beyond the RBA Code of Conduct and are being rolled out in stages and enforced. Key areas addressed include the importance of voluntary employment, working hours, humane treatment, fair wages and benefits and the prohibition of child labour. These provisions are grounded in the UN Guiding Principles on Business and Human Rights and are based on international standards.



Suppliers are chosen based on their capacity to fulfil both technical and logistical requirements, as well as the outcomes of a self-assessment and a status inquiry on specific business topics. To date, these topics have encompassed occupational health and safety, environmental protection and energy efficiency, along with social and ethical considerations.

ZEISS also requires its direct supplier companies to support due diligence and traceability throughout the supply chain for conflict minerals. In a risk-based approach, supplier companies are requested to provide ZEISS with up-to-date information, such as CMRTs (Conflict Minerals Reporting Templates), and to work towards excluding non-compliant smelters from their respective supply chains.

If ZEISS obtains substantiated knowledge of a possible violation of a human rights or environmental obligation at indirect supplier companies, the measures described above will also be taken regarding indirect supplier companies within the scope of the company's own powers.

### **Our effectiveness in ensuring slavery and human trafficking is not taking place**

As part of regular effectiveness checks, ZEISS examines at least once a year and on an ad hoc basis whether the established risk management effectively prevents or counteracts human rights and environmental risks. We use findings from stakeholder surveys, ZEISS internal audits, reviews, supplier audits and risk analyses to validate the effectiveness of preventive and remedial measures taken. If it is determined during these audits that existing processes have not adequately identified risks or that measures introduced have failed to have the desired effect, the Human Rights Officer initiates the necessary changes.

The effectiveness of the complaints process and the handling of reports of human rights violations is also regularly monitored. If there are indications of a need for improvement, appropriate measures will be initiated. The fulfilment of due diligence obligations is systematically documented. More information on human rights and the environment at ZEISS can be found in the ZEISS Group Sustainability Report:

[www.zeiss.com/corporate/en/about-zeiss/present/sustainability.html](http://www.zeiss.com/corporate/en/about-zeiss/present/sustainability.html)

During the year ended 30 September 2024 over 40 supplier audits relevant for ZEISS UK took place. For our Medical Technology business there was a special focus on modern slavery and human trafficking with 6 audits taking place in China and Singapore.

97% of the total purchasing volume of ZEISS globally is generated by around 6,600 suppliers. By 30 September 2024, around 33% of these suppliers had confirmed via the Supplier Portal that they would comply with the new ZEISS Supplier Standards or the RBA Code of Conduct or a similar code of conduct. ZEISS now has specific arrangements on sustainability requirements with suppliers accounting for around 60% of its total purchasing volume.



## Training and capacity building about slavery and human trafficking

Our Code of Conduct applies to all employees and supervisors at ZEISS and forms part of the mandatory compliance training for all employees. Compliance training, including the Code of Conduct, is assigned to all new employees on joining ZEISS. The content is reviewed and updated regularly and, when changed, is assigned again to all employees. Refresher training is triggered every two years even if there is no change to the content.

During the period 1<sup>st</sup> October 2023 – 30<sup>th</sup> September 2024 an additional 78 employees at ZEISS UK completed a specific online course "Preventing modern slavery in the workplace". An interactive course with engaging and informative content, including details of what to do if modern slavery is suspected. Those completing the course receive informative advice and guidance and will be tested on their understanding of the subject at the end of the course by completing the compulsory self-test.

## Statement approval

This statement was approved by the Boards of each of the companies listed below on the dates shown and is signed on behalf of each respective entity.

Mr Paul Adderley

Carl Zeiss Limited

19 March 2025

Mr Daniel Aldridge

Carl Zeiss Microscopy Limited

19 March 2025

Mr Matthew Guillatt

Carl Zeiss Vision UK Limited

19 March 2025

Mr Charles Wood

SILS Limited

19 March 2025