



Modern Slavery Act Statement

Year ended 30 September 2025

This statement provides an update on the actions we have taken (and continue to take) as a business, during the year ending 30 September 2025, to monitor and prevent slavery and human trafficking from occurring in our own operations and supply chain. This statement covers activity within 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").

ZEISS is committed to the principles of the Modern Slavery Act and the abolition of modern slavery and human trafficking. We reject any form of child or forced labour, slavery or human trafficking and we support an appropriate living minimum wage. Humane treatment in the workplace is a foundational principle of ZEISS. We stand up for fair working conditions and human rights, in our company and among our business partners.

Our organisation, its business and supply chains

The ZEISS group of companies is owned by the Carl Zeiss Foundation. The foundation statute of 1896 contains a total of 122 paragraphs. In it, Ernst Abbe combined a visionary, modern, employee-friendly corporate philosophy with entrepreneurial patronage. In the foundation statute, Ernst Abbe described his basic principles on corporate governance and social security for employees in detail. That was his way to commit the Foundation permanently to these principles. ZEISS firmly believes that economic success and innovation are inextricably linked with sustainable value creation and respect for human rights.

Since then, the ZEISS foundation company has evolved into a leading global technology enterprise. Recognising the responsibility that comes with this role, we are dedicated to upholding human rights and integrating environmental and climate protection into our business practices; both within our own operations and throughout our supply chains.

ZEISS operates through four areas known as Business Segments:

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



Each business segment reports to a designated member of the Executive Board of Carl Zeiss AG. The four companies listed at the end of this statement represent the Consumer Markets, Industrial Quality and Research and Medical Technology business segments in the UK and are fully integrated into the group reporting structures.

The ZEISS Group is represented in around 50 countries. The company is headquartered in Oberkochen (Germany). Furthermore, ZEISS is expanding its global presence with innovation and high-tech sites as a part of its global innovation strategy. As of September 2025, the Group employs 46,622 people around the world, is represented in around 50 countries and reported revenue of €11.896bn for the year then ended.

With an innovative portfolio, geared towards future-oriented markets in optics, precision mechanics and optoelectronics, the ZEISS Group is one of the world's leading technology companies. As an internationally active company with global supply and value chains, ZEISS takes its responsibility to people and the environment seriously. 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

With a fundamental culture of “doing the right thing” all employees at ZEISS are responsible for aligning their actions with applicable laws and internal rules. This is supported by a Compliance Management System (CMS) that ensures the Group conducts its operations lawfully and ethically, forming the basis for long-term, sustainable business success. The CMS is overseen by the Executive Board, which holds each ZEISS entity responsible for establishing appropriate organisational and governance structures, as well as developing the policies, procedures, leadership, and training needed to fulfil these requirements. The CMS is reviewed and updated on a regular basis, most recently in 2024.

The following policies are available to all staff:

- Code of Conduct – also online at www.zeiss.com/compliance/en/home.html
- Bullying and Harassment Policy
- Equality, Diversity and Inclusion Policy
- Recruitment Policy
- Whistleblowing Policy

Further information may be found here:

www.zeiss.com/corporate/en/about-zeiss/present/sustainability/common-good.html



Our due diligence processes in relation to slavery and human trafficking

ZEISS operates a comprehensive risk management system that establishes consistent rules and processes for the early detection, assessment, and mitigation of risks within its own business operations and across the supply chain. Risk coordinators in the business segments support the responsible management teams in implementing central requirements and guidelines.

In 2023, to ensure effective implementation and continuous development of human rights and environmental due diligence, the Group's Executive Board appointed a Human Rights Officer. The Human Rights Officer is integrated in the compliance and reporting processes of the ZEISS Group and responsible for risk management regarding human rights and environment-related risks. Management of the respective ZEISS Group business segment is responsible for identifying, managing and reporting human rights and environment-related risks and maintains a close exchange with the Human Rights Officer.

At least once a year, and whenever needed, the Human Rights Officer reports the results of the risk analysis and what was learned from reviewing any complaints. Information about how effective our due-diligence processes are under the German Supply Chain Act (LkSG) is also shared with the Executive Board.

Where there is a risk of slavery and human trafficking

ZEISS carries out a yearly risk assessment for its own operations and its direct suppliers. Additional checks are done if new information or changes suggest a higher risk, and indirect suppliers may also be included. Risk assessment follows a step-by-step process. External data, such as country indices and industry-specific risks, are used to identify potential human rights or environmental risks. Then, ZEISS adds internal information from its systems to build a more detailed picture and prioritise the key risks. For ZEISS-controlled companies, risks are assessed using internal indicators and are rated by severity, likelihood, and how easily issues could be reversed. Some locations have been identified for closer monitoring, particularly for health, safety, and environmental risks.

For direct suppliers, ZEISS reviews available information such as influence, spend, and product complexity to prioritise which suppliers need closer attention. These suppliers are then monitored using the company's available tools. Because ZEISS operates internationally and relies on many suppliers, risks related to working conditions, environmental protection, and supply-chain transparency are important. ZEISS continues to improve the quality and consistency of its data and takes preventive or corrective action where needed. This builds on long-established internal risk-management and supplier-management processes.



All employees must follow the ZEISS Code of Conduct and related policies, and they receive mandatory compliance training at least every two years. Additional training on human rights and environmental due diligence is available where relevant. ZEISS also uses Group-wide instructions to ensure safe and healthy working conditions, supported by certified management systems such as ISO 14001 and ISO 45001. Internal audits are carried out regardless of certification.

Before working with a new supplier, ZEISS conducts a detailed review, including checks on human rights and environmental standards. Supplier profiles are regularly updated and reviewed. Based on identified risks, ZEISS provides information or training, may conduct on-site audits, and requires suppliers to meet ZEISS' standards, apply them in their own supply chains, and cooperate in any preventive or corrective actions. ZEISS also requires suppliers to follow the Responsible Business Alliance (RBA) Code of Conduct, which covers human rights, health and safety, environmental protection, and ethical business practices. In addition, ZEISS has its own Supplier Standards, developed for the German Supply Chain Act (LkSG), which set even stricter human rights and environmental expectations. These standards are being rolled out in stages and include rules on voluntary employment, working hours, fair pay, humane treatment, 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.

The full ZEISS Supplier Standards may be found online here:

<https://www.zeiss.com/corporate/en/suppliers/zeiss-suppliers/documents-for-suppliers.html>

Suppliers are selected not only for their technical and logistical capabilities but also for how they score on self-assessments and reviews of topics such as health and safety, environmental protection, and ethical practices. ZEISS requires direct suppliers to support due diligence and traceability for conflict minerals. Depending on risk, suppliers must provide up-to-date information - such as Conflict Minerals Reporting Templates (CMRTs) and work to remove any non-compliant smelters from their 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

At least once a year ZEISS checks whether the established risk management system effectively prevents or counteracts human rights and environmental risks. A comprehensive validation of the effectiveness of preventive and corrective measures is completed with audits, surveys, reviews and risk analyses. If it is determined during these checks 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.

Regular monitoring of the complaints process and the handling of reports of human rights violations is in place to ensure effectiveness. 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

During the year ended 30 September 2025 over 100 supplier audits relevant for ZEISS UK were conducted. For our Medical Technology business, as in the prior year, there was a special focus on higher risk countries. With 14 in-person audits in China (12), Dominican Republic (1) and Singapore (1) no observations or suspicions regarding aspects of modern slavery and human trafficking occurring were identified.

Training and capacity building about slavery and human trafficking

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

Between 1 October 2024 and 30 September 2025, 167 ZEISS UK employees (new starters or refresher training) completed the dedicated online course "Preventing Modern Slavery in the Workplace." This interactive training provides engaging, practical content, including clear guidance on what steps to take if modern slavery is suspected. Participants receive relevant advice and support throughout the course and are required to complete a mandatory self-test at the end to demonstrate their understanding of the topic.



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

18 March 2026

Mr Daniel Aldridge

Carl Zeiss Microscopy Limited

18 March 2026

Mr Matthew Guillatt

Carl Zeiss Vision UK Limited

17 March 2026

Mr Charles Wood

SILS Limited

17 March 2026