Anti-Slavery and Human Trafficking Statement and Risk Management Plan

(for the financial year ended 31 December 2025)

This statement is published on behalf of **SGO Corporation Limited ("SGO")**, pursuant to section 54 of the UK Modern Slavery Act 2015. It applies to SGO and all of its subsidiary companies and companies in the SGO Group, including, but not limited to, **Smartmatic International Holding B.V., AirScape Holdings Limited, and Folio Technologies Limited** (the **SGO Group / we / our**).

Our organisational structure

SGO is an Anglo-American **investment/holding company** comprising a series of established and developing ventures, the most significant of which is Smartmatic, the world's leading provider of electronic voting systems, which operates through Smartmatic International Holding B.V. Further information about the SGO Group of companies can be found on our websites **www.sgo.com** and **www.smartmatic.com**.

SGO is a professional services business that predominantly employs professionally qualified and highly skilled people. As a result, the risk of modern slavery within our business is considered low.

Our supply chain consists of goods and services procured to enable our people to deliver these services. Our relationships with subcontractors, suppliers and their employees, business partners, agents, and others working on their behalf (collectively "Third Parties") principally include professional services, manufacturing services, consultancy, human resources, information technology, and sales and marketing.

There have been no material changes to our organisational structure or supply chain since our last Slavery and Human Trafficking Statement.

Our commitment

We are committed to combating modern slavery and human trafficking. This statement and risk management plan highlight the key activities that we undertake, or are committed to undertaking, in order to combat the risk of modern slavery and human trafficking, both in our business and in our supply chains.

Policies

Our policy framework includes a range of policies and guidelines that help define our commitment to the identification and prevention of modern slavery in our business and supply chains. In 2023, our policy framework was updated to ensure compliance with recent legal changes and current best practice. Relevant policies include:

• **Human Rights & Modern Slavery Policy:** makes explicit our commitment to the United Nations Guiding Principles on Business and Human Rights. This policy confirms

our commitment to respect and support international human rights, and in particular the International Bill of Rights and the International Labour Organization's Declaration on the Fundamental Principles and Rights at Work.

• **Diversity and Inclusion Policy:** encourages all our people to value diversity and respect each person's individuality, and to ensure that no partner, employee, agency worker, contractor, self-employed consultant, job applicant or former employee, client, or third party receives less favourable treatment on the basis of colour, race, nationality, ethnic or national origin, sexuality or gender, gender reassignment, marital or civil partner status, pregnancy or maternity, disability, age, or religion or belief.

• **Ethics Policy:** reflects the business practices and principles of behaviour that support SGO's commitment to maintaining the highest standards of business conduct and ethics.

• **Whistleblowing Policy:** offers individuals a confidential mechanism for disclosing suspicions or knowledge of possible impropriety, helping to protect the firm, its brands, people, and clients by providing an early warning when something appears to be wrong. This includes matters pertaining to our supply chain, including modern slavery.

• **Incident Reporting Policy:** offers individuals a mechanism for reporting breaches of our policies and procedures, and errors, acts, or omissions that result in breaches of the legal or regulatory obligations of individuals or Smartmatic. All staff have a personal obligation to report such incidents promptly and honestly when identified.

• **Anti-Bribery and Corruption Policy:** sets out our strict rules and what is expected of all our people. We expect the same standards of conduct from our independent contractors and third-party service providers in all dealings on our behalf.

SGO is committed to addressing the health and wellbeing of our people and provides access to support delivered internally and by independent third-party providers. These providers offer free and confidential advice and assistance on matters including workplace concerns or issues.

Risk Evaluation and Management

We perceive the greatest risk of slavery and human trafficking to lie in our supply chain, as managerial responsibility is not directly under our control but instead lies in the hands of third parties with whom we contract.

To help identify and mitigate the risk of slavery and human trafficking in our organisation and supply chains, we:

• Operate an **Ethical Code of Conduct** that specifically addresses instances of modern slavery by including, among other things, an obligation on our suppliers to ensure that employment with them is freely chosen, child labour is not used, living wages are paid, and working hours are not excessive.

• Include **anti-slavery and human trafficking provisions** in all our contracts with suppliers. These provisions require our suppliers to commit to ethical labour practices (including adherence to our Ethical Code of Conduct) and to obtain the same commitment from their suppliers.

• Carry out a **due diligence process** with our suppliers that is specifically aimed at assessing and mitigating the risk of modern slavery and human trafficking.

• Do not simply purchase goods or services based solely on cost. We operate in emerging as well as developed markets and therefore recognise areas of potentially higher risk, including services involving relatively high levels of contracted labour. We conduct meaningful consultation with relevant stakeholders to mitigate the possibility of involvement in modern slavery in our supply chains. We continue to build on this process to gain further visibility into our supply chains, including through regular reviews of our data sets. We maintain a database of our first-tier suppliers to maximise control and coordination.

• Operate relevant policy documents (see above); and

• Provide effective training to all relevant staff (see below).

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we plan to provide relevant training to our staff so that they are able to recognise signs of human trafficking and slavery and report them where appropriate. We also plan to train all relevant staff on our policies concerning whistleblowing, anti-bribery, and equal opportunities.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators to measure how effective we have been in ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains:

• **Staff right-to-work verification:** We confirm that all staff have been checked and have the correct right-to-work documentation in place.

• **Reported breaches:** We confirm that we have not identified or received any reports from our staff, the public, suppliers, or law enforcement agencies indicating that modern slavery or human trafficking practices are taking place in our business or supply chains.

Further Risk Management Plans

Following a review of the effectiveness of the steps we have taken in the past year to ensure that there is no slavery or human trafficking in our supply chains, we intend to

take the following further step to combat slavery and human trafficking: **to provide relevant training to our staff as detailed above.**

This statement has been approved by the **Board of Directors of SGO Corporation Limited** in accordance with section 54(6) of the **Modern Slavery Act 2015**.

Colin Flannery
General Counsel

On behalf of the Board of **SGO Corporation Limited**