

MODERN SLAVERY ACT TRANSPARENCY STATEMENT **FOR VAX LIMITED**

VAX Limited (“VAX”) recognises that communities, economies, and businesses thrive when workers’ rights are protected and, as such, understands the risk of, and damage caused by, modern slavery to VAX’s business.

Treating workers of all types - employee, contractor, student, migrant, temporary worker, and others - with dignity and respect is a fundamental component of VAX’s commitment to acting as a good corporate citizen. Specifically, VAX is committed to a work environment free from forced labour or slavery, unlawful child labour, and the illegal movement of people for the purpose of slavery or human trafficking. VAX takes various actions to prevent the risks of modern slavery in its own operations and in its supply chains.

This statement relates to actions and activities during the financial year 2025.

RELEVANT POLICIES

As part of its parent company, Techtronic Industries Company Limited (the “Company”), VAX has a laser focus on the image and reputation of the organisation in how it conducts business in the global marketplace. The Company’s policies affirm our commitment to preventing, detecting, and eliminating human trafficking, modern slavery, and related abuses within our organisation and along our value chain. They outline potential red flags related to work and living conditions, poor health, or unusual work behavior. These indicators are designed to help associates and suppliers identify possible issues.

The policies and procedures that address the Company’s commitment to responsible sourcing are available on its website at <https://www.ttigroup.com/company/our-policies>.

- **Code of Ethics & Business Conduct:** The code sets forth the rules and guidelines to fulfill the Company’s commitment to conducting its business in a legal and ethical manner.
- **Complaint Resolution Policy and Procedure:** The organisation encourages anyone to report any action, situation or circumstance that appears to be in violation of the Code of Conduct or of any laws, regulations or other internal policies. This policy provides a mechanism for the reporting of such concerns anonymously if desired without fear of retaliation.
- **Business Partner Code of Conduct:** The code sets out the Company’s requirements and principles which shall be complied with by Business Partners and their owners, subsidiaries, affiliates, directors, officers, employees, agents and subcontractors.
- **Policy Against Modern Slavery:** This policy defines the standards, expectations, and requirements that the Company’s Group employees and Business Partners must follow to prevent Modern Slavery in its business operations and defines how the organisation will make efforts to avoid, detect and eradicate modern slavery from the Company’s or Business Partners’ operations. It also includes a non-exhaustive list of potential red flags and indicators of Modern Slavery.
- **Conflict Minerals Procurement Policy:** This policy reflects the Company’s commitment to ensure that any Tin, Tungsten, Tantalum, and Gold (“3TG”) sourced and used in its products are procured from reputable sources free from conflict or other human rights violations.
- **Cobalt and Mica Procurement Policy:** This policy reflects the Company’s commitment to ensure that Cobalt and Mica ultimately used in its products do not come from mines sources and/or smelters who

source Cobalt and Mica from a conflict-affected and high-risk area as defined by the OECD Due Diligence Guidance¹ or otherwise utilize forced labour or unlawful child labour.

- **Anti-Corruption Policy:** This policy is designed to prevent corruption in all the Company's activities.
- **Anti-Trust Policy:** This policy guides employees on both the legal and Company-established rules on competition and fair business practices.
- **Global Trade Sanctions Compliance Policy:** This policy defines the rules, standards, and expectations that the Company and its suppliers must abide by to ensure that the organisation remains in compliance with all applicable export/import control laws, regulations and economic sanctions laws.

DUE DILIGENCE

As part of its Social and Environmental Responsibility (SER) compliance program, the Company requires our suppliers to acknowledge the Policy Against Modern Slavery and Human Trafficking and complete an annual survey to assess related risks. Comprehensive supplier reviews are conducted through in-person audits led by SER compliance, quality, and sourcing teams, or by external auditors when necessary.

The Company utilizes recognized social audit methodologies, including the Sedex Members Ethical Trade Audit (SMETA) and the Business Social Compliance Initiative (BSCI) by amfori. Audits are conducted by independent firms approved by the Association of Professional Social Compliance Auditors. To date, Company owned sites have completed SMETA audits, and suppliers have undergone either SMETA or BSCI audits. Findings from these audits contribute to industry knowledge sharing and promote higher standards across the global supply chain.

Complementing these efforts, the SER online compliance platform enables suppliers to acknowledge key requirements and policies while allowing the Company to monitor performance and risks more efficiently. As part of our SER compliance program, all suppliers are required to sign an annual declaration confirming their understanding of and adherence to TTI's SER policies and standards. Annual supplier risk assessments are supported by global indices, including the GRI Index, Corruption Index, and Human Development Index, as well as partnership with the Mekong Club, membership in the Responsible Business Alliance (RBA), and Better Mining Initiative.

TRAINING

Training on TTI's Code of Ethics & Business Conduct (CoC) and Policy Against Modern Slavery and Human Trafficking is mandatory for all employees. The Company's Online Compliance Platform allows business units to work with suppliers globally to improve the transparency of the Company's supply chain and the efficiency of the Company's data collection process. Through this platform, business units request supplier information, and suppliers access training materials and acknowledge their acceptance of key compliance requirements and policies.

AWARENESS

The Policy Against Modern Slavery and Human Trafficking has been communicated to all our employees.

The Company produces annual reporting on all governance, environmental, social, community and supply chain management goals and initiatives which take into account legal compliance to global modern slavery frameworks. Our latest report can be located here: <https://www.ttigroup.com/sustainability/esg-reports/>

BOARD APPROVAL

This statement has been approved by the board of VAX Limited on 16 June 2026. This statement has been published in accordance with the Modern Slavery Act 2015.

Danielle Clayton

Signed by:
Danielle Clayton
00999EE31271498...

David Winterbottom

Signed by:
David Winterbottom
A3C2CE1C5B474AE...