

# Modern Slavery and Human Trafficking Statement – Financial Year 2024

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and covers the financial year ending **31 December 2024**.

We remain firmly opposed to all forms of modern slavery and human trafficking and are committed to ensuring they have no place in our own operations or in the supply chains that support our business in the UK and world-wide.

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## 1 | Our business and supply chains

Open-Xchange GmbH (also trading as Everymail) provides email-subscription services, supplies software and operates an email platform to and for customers including in the United Kingdom. We employ approximately **130** staff and purchase goods and services principally in **Europe and USA**. Our key supply-chain categories are software development, hosting capacity, data center premises and compute power, as well as IT equipment and professional services.

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## 2 | Policies and controls

We operate the following policies that support our zero-tolerance approach to modern slavery:

- internal Code of Conduct
  - Whistleblowing Policy (anonymous reporting channel)
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## 3 | Risk assessment and due diligence

- We screen **new prospective suppliers** for obvious misdemeanor by researching their publications and generally available press coverage; if this research reveals any negative results with regards to environmental, social, or governance related topics (including modern-slavery concerns), we investigate further by deploying bespoke

questionnaires.

- **Key Suppliers** undergo a detailed supplier screening process, running full-scope review of all their business-related policies, as relevant to the line of business we are engaging them for.
- **Existing suppliers** are reviewed periodically; any modern-slavery concerns are investigated and, if necessary, escalated to senior management and ultimately terminated if the concerns cannot be discharged.
- We are **not aware of any instances** of modern slavery in our operations or supply chains during FY 2024.

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## 4 | Awareness

We regularly remind our employees of the importance of measures against human trafficking and modern slavery in general by our specialist staff regularly involved in sourcing and supplier management.

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## 5 | Board approval and signature

This statement was approved by resolution of the shareholders on **27 June 2025** and signed by:



**Clemens Manuel Engel**

Managing Director

Date: **27 June 2025**