

Report of the Hamilton Companies Hamilton Bonaduz AG, Hamilton Medical AG, and Hamilton Services AG in the Areas of Conflict Minerals and Metals and Child Labour

Reporting pursuant to Art. 964j et seq. of the Swiss Code of Obligations (CO) and the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO)

The Hamilton companies Hamilton Bonaduz AG (since 29 May 2026 [amendment of articles of association dated 22 May 2026] operating under the name «Hamilton AG»), Hamilton Medical AG and Hamilton Services AG (hereinafter «Hamilton Switzerland») and their subsidiaries are committed to their corporate responsibility as an integral part of their worldwide business activities. They strive to conduct their business activities in accordance with applicable laws and regulations and in an environmentally and ethically responsible manner.

The DDTrO regulates the due diligence and reporting obligations of companies pursuant to Art. 964j–964l CO in relation to minerals and metals from conflict-affected and high-risk areas and child labour.

In fulfilment of these provisions, Hamilton Switzerland publishes the following report for the business year from 1 December 2024 to 30 November 2025 (hereinafter «Business Year 2024/2025»).

Due Diligence and Reporting Obligations regarding Minerals and Metals

For Business Year 2024/2025, we have checked whether, pursuant to Art. 964j para. 1 no. 1 CO, we imported into Switzerland and/or processed in Switzerland minerals or metals containing tin, tantalum, tungsten or gold corresponding to the tariff numbers listed in Annex 1 of the DDTrO in quantities exceeding the relevant thresholds.

The check established that we did not import into Switzerland or process in Switzerland any relevant minerals or metals in quantities exceeding these thresholds during Business Year 2024/2025.

Accordingly, we were not subject to any due diligence and reporting obligations in the area of minerals and metals from conflict-affected areas during Business Year 2024/2025.

Due Diligence and Reporting Obligations regarding Child Labour

We attach great importance to the observance of human rights and in particular to the protection of children. For Business Year 2024/2025, we have reviewed our supply chains with regard to the risk of

child labour. In doing so, we assessed the countries of origin of our products using the UNICEF Children's Rights in the Workplace Index («UNICEF Index»).

The analysis established that the majority of our suppliers and the products sourced by us during Business Year 2024/2025 originate from countries with a low risk of child labour (classification: «Basic»). Some products do originate from countries with an elevated risk; however, based on the information available to us, we could not identify any reasonable grounds to suspect child labour, such that Hamilton Switzerland was not subject to any due diligence and reporting obligations in relation to child labour during Business Year 2024/2025.

However, we have decided on a voluntary basis to implement the due diligence and reporting obligations regarding child labour and to take the necessary measures to further reduce the risk of child labour and other human rights violations in the supply chain in the future. This underscores our commitment to responsible business practices for the protection of human rights.

1. Our Commitment to the Protection of Human Rights

In line with our commitment to the protection of human rights, we at Hamilton Switzerland are dedicated to improving people's lives. The respect for and promotion of human rights along our entire supply chain is an indispensable prerequisite for realising this vision. A particular focus lies on the prohibition of child labour and any form of forced labour – not only within the Hamilton companies but also along our entire supply chain.

The promotion of human rights begins internally with our Code of Conduct, which sets out our clear position on topics such as human rights, child labour and forced labour for our employees. The Code of Conduct is binding on all employees at Hamilton Switzerland and is communicated through targeted training. Upon joining the company, employees must expressly commit to compliance with the Code. Our commitment to human rights is not limited to the Hamilton companies but is also an essential component of our supplier management.

2. Our Supply Chain Policy

Our management approach includes a Supplier Code of Conduct that obliges suppliers to ensure labour and human rights and in particular includes a prohibition of child labour within the meaning of ILO Conventions No. 138 and 182. Furthermore, the Supplier Code of Conduct obliges suppliers to introduce their own systems for conducting due diligence in their own supply chain. It also grants Hamilton Switzerland information and audit rights and obliges suppliers to ensure transparency and cooperation in verifying compliance with the relevant requirements.

The Supplier Code of Conduct is continuously being implemented in the contractual relationships with our suppliers. The focus is on suppliers of products from countries that, according to the UNICEF Index, have an elevated risk of child labour.

A «Supplier Management Risk Index» serves us to monitor country-specific supply chain and compliance risks (child labour, sanctions, corruption and money laundering). Based on this index, we can formulate specific requirements for certain suppliers regarding the risks. Suppliers that originate from or offer products from a country which, according to the «Supplier Management Risk Index», presents an elevated risk, may be excluded from the supplier portfolio if they do not acknowledge the Supplier Code of Conduct and do not confirm compliance therewith.

3. Our Supply Chain Traceability System

In order to ensure and improve traceability in the relevant risk areas on a long-term basis, we are continuously working on integrating the relevant data from our procurement into our system.

Our Supplier Code of Conduct obliges suppliers to support us as needed and to ensure the necessary transparency regarding potential human rights risks, in particular child labour.

4. Our Reporting Procedure for Risk Identification

Since the end of 2023, Hamilton Switzerland is operating a reporting procedure that enables all persons, including those within Hamilton but also in its supply chain, to draw our attention to grievances, including potential or actual adverse impacts related to human rights and in particular child labour.

Concerns can be reported via the Hamilton whistleblowing system (<https://hamilton.integrityline.io>). The person reporting may decide whether to remain anonymous. Incoming reports are investigated and reviewed. In the course of the investigation, we seek external advice as needed, and relevant reports are forwarded in an appropriate form to the management. In doing so, we maintain confidentiality and protect the identity of the reporting person.

If our suppliers suspect or observe violations of applicable law or the Supplier Code of Conduct, they are required to report this to us.

During the reporting period Business Year 2024/2025, no reports or complaints relating to child labour were received through the reporting system.

5. Our Risk Management

The early identification and assessment of risks is a central element for us to identify potential weaknesses or violations – for example in the area of human rights, in particular child labour – as early as possible and to address them effectively. The risk analysis serves to systematically identify,

assess and treat risks in a risk-appropriate manner. In this way, we ensure that our business activities are in line with the laws applicable to us, our internal policies and ethical standards.

Our general risk management takes place within the framework of Enterprise Risk Management. Supply chain and compliance risks are derived from Enterprise Risk Management and subsequently refined. The risk analysis with regard to supply chain and compliance risks follows the structured approach set out below: (i) identification of risks, (ii) assessment and prioritisation of risks, and (iii) development of measures.

In the area of child labour, we currently see the greatest, albeit abstract, risks in the upstream supply chain and in products from countries of origin with an elevated risk of child labour. Based on these findings, we develop appropriate risk mitigation strategies, for example in the form of the measures described above, such as the targeted implementation of the Supplier Code of Conduct with suppliers of products from risk countries, the completion of the data basis, as well as through training, audits and process optimisations. In this way, we aim to ensure that we meet our high standards and prevent any form of legal violations, particularly in sensitive areas such as child labour, to the greatest extent possible.