

Hamilton Storage GmbH's report on the fulfillment of due diligence obligations in the area of child labor

Reporting in accordance with Art. 964j ff. of the Swiss Code of Obligations (OR) and the Swiss Ordinance on Due Diligence and Transparency with respect to minerals and metals from conflict areas and child labor (VSoTr)

Hamilton Storage GmbH and its subsidiaries (hereafter "Hamilton Storage") recognize their social responsibility as an integral part of their global business activities. As part of the Hamilton Group (hereafter "Hamilton"), Hamilton Storage shares the same high ethical standards, both internally and in its cooperation with suppliers.

The Swiss Ordinance on Due Diligence and Transparency regarding minerals and metals from conflict areas and child labor (VSoTr) regulates the due diligence and reporting obligations of companies in accordance with Art. 964j–964l of the Swiss Code of Obligations with regard to minerals and metals from conflict and high-risk areas as well as child labor.

In fulfillment of these requirements, Hamilton Storage is publishing the following report for the fiscal year from July 1st, 2024, to June 30th, 2025 (hereinafter "fiscal year 2024/25").

Due diligence and reporting requirements for minerals and metals

For the financial year 2024/25, we have examined whether we have imported into Switzerland and/or processed in Switzerland minerals or metals containing tin, tantalum, tungsten or gold that correspond to the customs tariff numbers listed in Appendix 1 of the VSoTr and that are above the relevant thresholds in accordance with Art. 964j para. 1 no. 1 of the Swiss Code of Obligations.

The audit showed that Hamilton Storage did not import any relevant minerals or metals into Switzerland or process any in Switzerland in the 2024/25 financial year above the thresholds defined in Appendix 1 of the VSoTr.

Therefore, Hamilton Storage is not subject to any due diligence and reporting requirements with regard to minerals and metals from conflict areas in the 2024/25 financial year.

Due diligence and reporting requirements regarding child labor

We place a high value on respecting human rights and, in particular, protecting children. For the 2024/25 financial year, we have assessed our supply chains for the risk of child labor. We have evaluated the countries of origin of our products using the UNICEF Children's Rights in the Workplace Index ("UNICEF Index").

The analysis showed that the majority of our suppliers and the products we purchased in fiscal year 2024/25 come from countries with a low risk of child labor (classification: “Basic”). Some products do come from countries with an increased risk (classification: “Enhanced”), but based on the information available to us, we could also in this financial year not determine any reasonable suspicion of child labor, so Hamilton Storage is not subject to any due diligence or reporting requirements with regard to child labor in fiscal year 2024/25.

However, we have voluntarily decided to fulfill the due diligence and reporting requirements regarding child labor and to take the necessary measures to further reduce the risk of child labor and other human rights violations in the supply chain in the future. This underscores our commitment to responsible business practices that protect human rights.

1. Our commitment to protecting human rights

In line with our commitment to protecting human rights, we at Hamilton are dedicated to improving people's lives. Respecting and promoting human rights throughout our supply chain is an essential part of realizing this vision. A particular focus is on the prohibition of child labor and all forms of forced labor – not only within the Hamilton Group, but also throughout our supply chain.

For us, promoting human rights begins internally with our Code of Conduct, which defines our clear position on issues such as human rights, child labor, and forced labor for our employees. The Code of Conduct is binding for all employees at Hamilton and is communicated through targeted training. The Code of Conduct is binding for all employees at Hamilton. It is communicated through targeted training courses and made known to new employees upon joining the company. However, our commitment to human rights is not limited to the Hamilton Group, but is also an essential part of our supplier management:

2. Our supply chain policy

Our management approach includes a code of conduct for suppliers that obliges suppliers to guarantee labor and human rights and, in particular, prohibits child labor in accordance with ILO Conventions No. 138 and 182. In addition, the Code of Conduct requires suppliers to implement their own systems for conducting due diligence in their own supply chain. It also grants Hamilton information and control rights and requires suppliers to be transparent and cooperate in monitoring compliance with the relevant requirements.

The Code of Conduct for Suppliers was developed in 2024 and is now being increasingly implemented in our contractual relationships with our suppliers. The focus is currently on suppliers of products from countries classified as “Enhanced” or “Heightened” according to the UNICEF Index.

We use a “Supplier Management Risk Index” to monitor country-specific compliance risks (child labor, sanctions, corruption and money laundering). On the basis of this index, we can formulate specific requirements for certain suppliers with regard to compliance risks. Suppliers that come from a country or offer products from a country that has an increased risk according to the “Supplier Management Risk Index” must recognize the Code of Conduct and confirm their compliance with it, otherwise they may be excluded from the supplier portfolio.

3. Our system for the traceability of supply chains

To ensure long-term traceability in the relevant risk areas, we are continuously working on incorporating the relevant data from our procurement into our system on an ongoing basis. The information collected and documented by our purchasing department is continuously updated in order to gradually improve our data basis for supply chain traceability.

Our Supplier Code of Conduct requires suppliers to support us as needed and to ensure the necessary transparency with regard to potential human rights risks, in particular child labor.

4. Our reporting procedure for risk identification

Since the end of 2023, Hamilton has operated a reporting procedure that allows anyone to alert us to grievances, including potential or actual adverse impacts related to human rights and, in particular, child labor.

Concerns can be reported by any person through Hamilton's operational whistleblower reporting office (<https://hamilton.integrityline.io>). The person providing the information can decide whether they wish to remain anonymous. The reports received are investigated and checked. We use external consultants to assist us with the investigation of compliance risks and the relevant reports are passed on to the management in an appropriate form. In doing so, we maintain confidentiality and protect the identity of the person providing the information.

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

In the reporting period financial year 2024/25, no reports/complaints regarding child labor have been received by the reporting office.

5. Our risk management

The early identification and assessment of risks is a central component for us in order to recognize potential weak points or violations – for example in the area of human rights or child labor – as early as possible and to be able to counter them effectively. The risk analysis serves to systematically identify, evaluate and manage compliance risks in a risk-appropriate manner. This is how we ensure

that our business activities are in line with the laws, internal guidelines and ethical standards that apply to us.

Our general risk management is carried out as part of enterprise risk management. Compliance risks are derived from enterprise risk management and then refined. The risk analysis with regard to compliance risks follows the structured approach below: (i) identification of risks, (ii) assessment and prioritization of risks, and (iii) development of measures.

In the area of child labor, we currently see the greatest risks, albeit abstract, in our upstream supply chain and in products from high-risk countries of origin for child labor. On the basis of these findings, we develop appropriate strategies for risk minimization, for example in the form of the measures described above, such as the targeted implementation of the Code of Conduct for suppliers with products from high-risk countries and the completion of the data situation, as well as through training, controls or process optimizations. In doing so, we want to ensure that we meet our high compliance standards and prevent any form of legal violations, particularly in sensitive areas such as child labor, to the best of our ability.

In next financial year, we are planning to further enhance our risk identification, assessment and mitigation process through the introduction of a new supply chain due diligence tool. This tool will feature new risk assessment capabilities on country, industry and supplier level and will contribute to our overall supply chain due diligence in relation to, among others, human & child labor rights for Hamilton Storage GmbH.

Approved by management on December 12, 2025