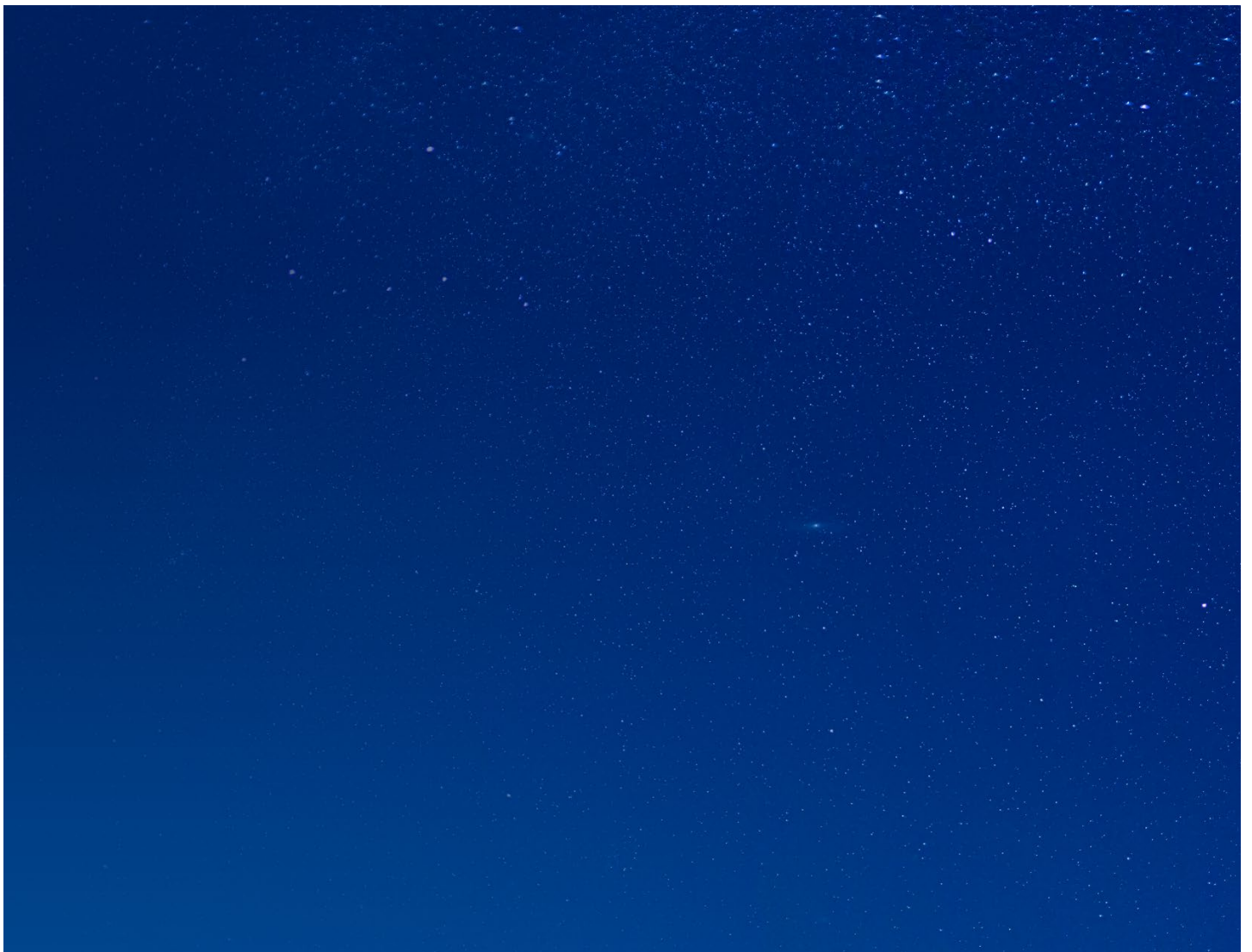




MODERN SLAVERY STATEMENT

Reporting period of 1 January 2024 to 31 December 2024



1. Introduction

This Modern Slavery Statement is a joint statement for the purposes of the *Modern Slavery Act 2018* (Cth) (the **Act**), in relation to the operations of Electro Optic Systems Holdings Limited (ABN 95 092 708 364), a public listed company incorporated in Australia whose registered office is situated at 18 Wormald Street, Symonston, ACT, 2609 and the group of entities as described in Appendix A (hereafter referred to as **we**, **our**, or **EOS**).¹

This Modern Slavery Statement is for the reporting period of 1 January 2024 to 31 December 2024.

2. Modern Slavery

Modern Slavery is defined under the Act to mean conduct which would constitute:

- a) an offence under Division 270 or 271 of the Criminal Code; or
- b) an offence under either of those Divisions if the conduct took place in Australia; or
- c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).²

EOS is aware of the impacts of modern slavery and that it is a significant problem with 49.6 million people living in situations of modern slavery, with 27.6 million in forced labour.³ EOS is also aware that modern slavery can occur anywhere in the world, with over 1,900 people in Australia being victims of modern slavery.⁴

In managing all of its business operations, EOS commits to and upholds certain values such as:

- Upholding high standards of honesty, integrity and ethical, responsible and law-abiding behavior; and
- Requiring directors and employees to act with due skill, care and diligence, to act impartially and in good faith and to the best of their abilities and otherwise in accordance with the EOS Code of Conduct.⁵

As such, EOS strictly prohibits modern slavery practices in all areas of its business and EOS is committed to operating responsibly by establishing and adhering to the highest ethical standards including compliance with applicable laws and other obligations.

4. Supply Chain Details

EOS engages with multiple suppliers in a wide range of industries including aerospace, defence, communications, transport and logistics, ICT and telecommunications, manufacturing, professional services, marketing and cleaning services.

Supply Chain Australia

In accordance with our 2022 Annual Report, EOS has 467 suppliers in Australia. This figure appears to have dropped slightly, given that EOS Defence Systems Pty Ltd alone only had a total of 306 active suppliers globally in 2024.

Supply Chain International

EOS' international supply chain consists of various suppliers across a broad range of industries including aerospace, defence, communications, transport and logistics, ICT, manufacturing, professional services, and cleaning services and include suppliers in countries such as Germany and the Netherlands.

5. Risks of Modern Slavery

EOS considers that the risk of modern slavery occurring within our operations and supply chains is relatively low, given that EOS operates in industries that are highly regulated with a complex technology focus.

Moreover, EOS' employee base, their work, and EOS' recruiting and hiring practices are not typically characteristic of those associated with labour exploitation and trafficking. The majority of the individuals employed by EOS hold business-related or engineering-related degrees and perform engineering or highly skilled technical or professional jobs.

Nevertheless, EOS is aware that it is not possible to remove all risks associated with Modern Slavery, and EOS is conscious of the fact that exposure exists in relation to:

- the engagement of third-party providers in industries that may have a higher prevalence of modern slavery practices. For example, operational support such as information technology and office cleaning services contracted by EOS;
- our supply chain, given EOS relies on suppliers domiciled both in Australia and overseas. EOS acknowledges that the risks of modern slavery may be heightened as a result of the geographical location of certain suppliers, the areas of operation, and the source of materials used in products supplied to EOS. However, EOS endeavors to require every member of its supply chain to meet the same legal and ethical standards as EOS demands of itself, and overall, EOS considers the overall risk of modern slavery in EOS' supply chain to be low; and
- EOS' operations in countries such as the United Arab Emirates, noting though that the majority of EOS operations occur in countries such as Australia, the United States, Singapore, New Zealand and Germany that are classified as low risk in regards to modern slavery.⁶

6. Actions Taken

In the last reporting period, EOS:

- implemented training for staff concerning modern slavery;
- created a supplier questionnaire process;
- audited suppliers in accordance with ISO 9001:2015;
- undertook a mapping exercise of its suppliers, identifying who they are and where they are based, with the majority being in Australia;
- continued to ensure that any person who applies for employment at EOS does so without undue pressure and all employees are legally entitled to leave upon reasonable notice without penalty. Offers of employment at EOS continue to be conditional upon the successful completion of required background and identity checks. These checks are conducted with the consent of the individual and are conducted by an independent party and protect the safety of employees; and
- reviewed our policy pertaining to modern slavery.

Furthermore, EOS is continuing its implementation of measures that encourage all group entities to consider, and where reasonably appropriate, implement the following practices:

- conduct audits of suppliers;
- formulate and review policies and procedures in relation to modern slavery, including but not limited to a Supplier Assessment and Performance Management Procedure that considers matters pertaining to modern slavery;
- conduct risk assessments – identify those parts of the business operations and supply chains where there is increased risk of modern slavery taking place;
- consider and establish processes and key performance indicators to monitor the effectiveness of the steps taken to ensure that modern slavery is not taking place in the business or supply chains;
- establish appropriate reporting mechanisms for internal and external reporting; and
- where appropriate, respond to any reasonable queries, concerns, or information suggesting elevated risks of modern slavery in accordance with the Modern Slavery Policy.

7. Assessment of Actions

EOS has not identified any issues pertaining to modern slavery during the reporting period. However, EOS recognises the importance of regularly assessing the effectiveness of the actions taken to combat modern slavery. In order to measure its effectiveness in this area, EOS will continually review the effectiveness of its actions.

8. Consultation

In developing this statement for the reporting period, EOS actively engaged with all the reporting entities covered by this statement and consulted with all the entities it owns and controls, as outlined in Appendix A.

9. Endorsement

This Modern Slavery Statement has been approved by the Board of Electro Optic Systems Holdings Limited (ABN 95 092 708 364). Electro Optic Systems Holdings Limited (ABN 95 092 708 364) is a 'higher entity' within the meaning of section 14(2)(d)(ii) of the Modern Slavery Act 2018 (Cth), being the entity in a position to influence or control each other reporting entity/relevant entity covered by this statement.

This Statement is signed by Andreas Schwer in his role as the Managing Director of Electro Optic Systems Holdings Limited (ABN 95 092 708 364).

Andreas Schwer

Chief Executive Officer and Managing Director of Electro Optic Systems Holdings Limited (ABN 95 092 708 364)

Signature: 

Date: 12 June 2025

Appendix A – Entities

As of 31 December 2024:

- Electro Optic Systems Holdings Limited
- Electro Optic Systems Pty Limited
- EOS Defence Systems Pty Limited
- EOS Space Systems Pty Limited
- EOS Communications Systems Pty Limited
- EOS USA Inc
- EOS Defence Systems USA Inc
- EOS Defence Systems Inc
- EOS Space technologies Inc
- EOS Defence Systems PTE LTD
- EOS Optical Technologies Limited
- EOS Advanced Technologies LLC
- EM Solutions Pty Limited
- Sovereign Missile Alliance Pty Ltd
- FCS Technology Holdings Pty Ltd
- Australian Missile Alliance Pty Ltd
- Electro Optic Systems Advanced Technologies LLC
- EM Solutions (Europe) B.V.
- EOS Innovation Singapore PTE LTD
- EOS UAE Holdings Pty Limited
- EOS Optronics GmbH

Appendix B – References

- 1) <https://www.asx.com.au/markets/company/EOS>
- 2) Section 4, Modern Slavery Act 2018 (Cth)
- 3) <https://www.walkfree.org/what-is-modern-slavery/>;
<https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/#:~:text=Forced%20Labour%20and%20Forced%20Marriage,that%20they%20were%20forced%20into>
- 4) [Anti-Slavery Australia](#)
- 5) <https://eos-aus.com/about-us/corporate-governance/>
- 6) <https://www.walkfree.org/global-slavery-index/>