

Joint Modern Slavery Statement

Made under section 14 of the Australian Modern Slavery Act 2018

Given by SiteGround Capital Ltd on behalf of SiteGround Hosting Ltd. and SiteGround Spain, S.L.U

1. Reporting entities, giving entity and reporting period

This is a joint modern slavery statement given under section 14 of the Australian Modern Slavery Act 2018 (the "Act"). The Statement is prepared by SiteGround Capital Ltd. a company incorporated under the laws of Cyprus with registered number HE 414758 having its registered address at 8 Michail Karaoli Street, office 106, CY-1095, Nicosia, Cyprus. (the "Giving Entity") on behalf of two reporting entities it owns and controls (together, the "Reporting Entities"):

- SiteGround Hosting Ltd. - a company registered under the laws of England and Wales, Companies House no. 09348602, registered address 7th Floor, 50 Broadway, London SW1H 0DB, United Kingdom which also reports on modern slavery under the Modern Slavery Act 2015 (United Kingdom) and has published respective statements on <https://www.siteground.co.uk/terms.htm>.

and

- SiteGround Spain, S.L.U. a company incorporated under the laws of Spain, registered in the Mercantile Registry of Madrid, CIF B87194171, registered office Calle de Prim 19, 28004 Madrid, Spain.

The Reporting Entities, the Giving Entity and their wider group are referred to as the "SiteGround Group" or the "Group".

This statement is given for the reporting period 1 January 2025 to 31 December 2025.

Each Reporting Entity is a reporting entity for this period on the basis that it carries on business in Australia and has an annual consolidated revenue of at least AUD \$100 million. Therefore, it has been decided for SiteGround Capital Ltd. to publish a joint statement covering both companies. SiteGround Capital Ltd. does not itself meet the reporting threshold and is not a reporting entity. It gives this statement in its capacity as sole owner of both Reporting Entities.

The Group is committed to highly respecting human rights and acting ethically and with integrity in its business activities. The Group has a zero tolerance approach to any form of modern slavery and human trafficking and is committed to taking appropriate action to combat modern slavery and human trafficking in its business and supply chains. The Group works closely with its supply chain to ensure that it meets the relevant obligations under the Act.

Modern Slavery and Human Trafficking Policy is adopted by SiteGround Capital Ltd and applies to all SiteGround subsidiaries and entities in which SiteGround Capital Ltd owns a majority

interest and which all together form the SiteGround Group of companies. This Policy applies to all SiteGround employees at all levels, directors, officers, shareholders, (the “**SiteGround Personnel**”), external consultants, business partners and volunteers.

Violation of our group Modern Slavery and Human Trafficking Policy by SiteGround Personnel may result in disciplinary proceedings, including termination of the employment or contractual relationship.

2. Structure, operations and supply chains

The Reporting Entities are part of the SiteGround Group of companies, which comprises companies registered in the USA, the United Kingdom, Spain, Bulgaria and Cyprus. SiteGround Capital Ltd. is the sole owner of both SiteGround Hosting Ltd. and SiteGround Spain, S.L.U. Currently the SiteGround Group offers online hosting solutions and other related services trusted by the owners of appr. 3 000 000 domains worldwide. The Reporting Entities sells online hosting and other related services to the legal entities conducting business in a wide variety of industries and business sectors, as well as to individuals and freelancers.

At Group level, the Group employs approximately 500 people across its offices, engaged in software development, management and maintenance, technical support and customer service, marketing, product management and development, web design, and general administration.

The Group aims to develop most of its services, software and products in-house, its supply chain is relatively limited. Each Reporting Entity maintains contractual relationships with third-party service providers, business partners, vendors and contractors outside the Group (the “Third Parties”), selected to support the business. The Third Parties provide the following categories of services:

- provision of server functionality and network connectivity services;
- security services;
- banking and financial services;
- marketing and advertising services;
- audit, accounting, insurance, consultancy and legal services, etc.

The two Reporting Entities share the same operations and supply chains and there are no material differences between them for the purposes of this statement.

3. Risks of modern slavery practices in operations and supply chains

The Reporting Entities have assessed the risks across their operations and supply chains and have a reasonable basis for the assessment set out below. Since the Reporting Entities share the same operations and supply chains, their risk profile is the same and there is no material difference between their operations.

The Reporting Entities' operations consist mainly of online sales of hosting and other related services, marketing and support services provided/developed by in-house employed workforce across the Group. The Reporting Entities consider the risk of modern slavery within their own operations to be low, having regard to the nature of the work, the locations in which staff are employed, and their employment practices (including ensuring that every employee has the right to work in the relevant jurisdiction and is paid at or above the applicable statutory minimum wage).

To the date of this statement, the Reporting Entities have not identified any instance of modern slavery within their operations or supply chains, and have not received any information or indication of such issues affecting any of their Third Parties or those Third Parties' supply chains.

4. Actions taken to assess and address risks of modern slavery (including due diligence and remediation)

Before engaging a Third Party, and where appropriate, the Reporting Entities conduct a due diligence process to assess the proposed relationship and to identify and mitigate risks. This includes:

- an initial review of the Third Party's business and supply chain, where reasonably practicable, with regard to reputation and business ethics, including modern slavery policies or statements;
- a risk assessment of business, operational and reputational risks that may arise during the relationship with the Third Party;
- the negotiation of contractual arrangements requiring compliance with applicable local laws and regulations.

After engagement, the Reporting Entities periodically review and, where appropriate, audit the relationship to confirm that anti-slavery commitments continue to be met.

Should modern slavery be identified, Each Reporting Entity would take remediation actions by expressly opposing the actions or practices in question. In serious cases, the Reporting Entities would cease using the services of any Third Party that is suspected of, or proven to be in, breach of that standard after securing an alternative service provider and where necessary would inform competent state law enforcement authorities.

5. Assessing the effectiveness of actions

The Reporting Entities regularly review the effectiveness of Group Modern Slavery and Human Trafficking Policy and their procedures and are committed to reviewing their measures annually and suggest implementing improvements where necessary. They provide annual training to support understanding of the risks of modern slavery and human trafficking in their supply chains and business. This training:

- (i) enables the Directors of the Reporting Entities to identify and know how to spot and report incidents of abuse and neglect, including modern slavery and human trafficking;
- (ii) explains what to do if the Directors of the Reporting Entities come into contact with a potential victim;
- (iii) explores the risks to individuals who have been trafficked and enslaved;
- (iv) explains how to support.

Annual trainings have been organized on a Group level for directors, HR experts and other employees and consultants. With the knowledge gained from the trainings, the competent people within the Group are able to assess the outcomes of due diligence and periodic supplier reviews, and whether any instances or indications of modern slavery have been identified or reported during the period.

6. Consultation with owned or controlled entities

SiteGround Capital Ltd is the sole owner of both Reporting Entities. As the entity giving this joint statement, SiteGround Capital Ltd consulted with each Reporting Entity in preparing it. Given the common ownership and the fact that the Reporting Entities share the same operations, supply chains, risk profile and control measures, the consultation process was straightforward: a single, coordinated drafting and review process was conducted across SiteGround Capital Ltd. and both Reporting Entities, with each Reporting Entity reviewing and providing input on the content describing its operations, supply chains, risks and actions before the statement was finalised and approved.

Neither SiteGround Hosting Ltd. nor SiteGround Spain, S.L.U. owns or controls any other entity. Accordingly, no further consultation with downstream owned or controlled entities was required.

7. Other relevant information

SiteGround Hosting Ltd. also reports on modern slavery under the Modern Slavery Act 2015 (United Kingdom).

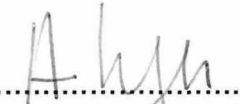
Approval and signature

This joint statement was approved by the principal governing body of SiteGround Capital Ltd., in its capacity as the entity in a position to influence and control both Reporting Entities as foreseen under section 14(2)(d)(ii) of the Act.

This Joint Statement was approved on June 17, 2026 by the Board of Directors of SiteGround Capital Ltd, in the capacity as sole owner of SiteGround Hosting Ltd. and SiteGround Spain, S.L.U.



/Rebecca Tsoupani – Director/



/Andriani Lymbouri – Director/