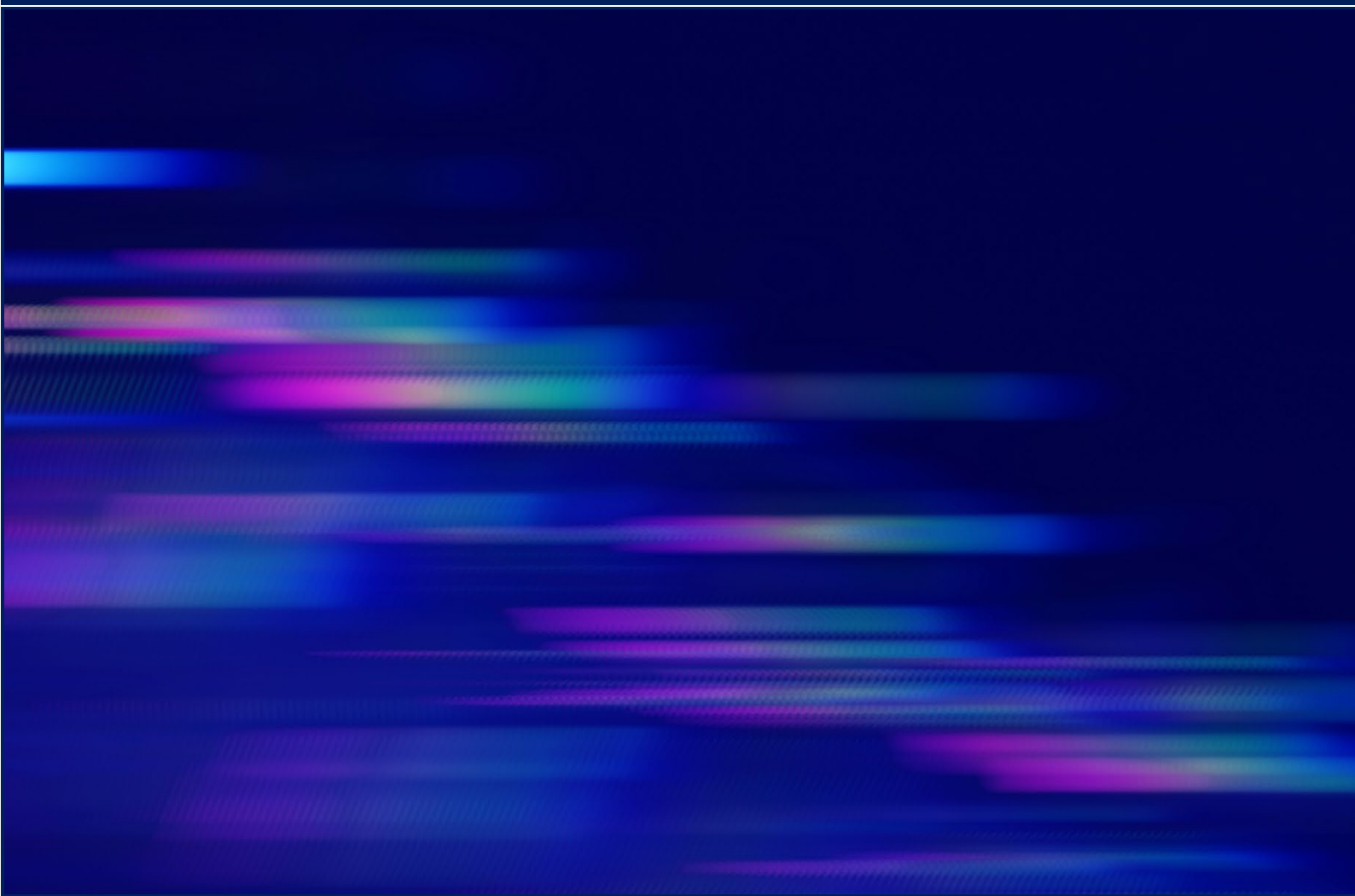




MODERN SLAVERY STATEMENT

Reporting period of 1 January 2025 to 31 December 2025



1. Introduction

This is the 2025 Modern Slavery Statement submitted by Electro Optic Systems Holdings Limited (ABN 95 092 708 364) (**EOS, our, we**) for the purposes of the *Modern Slavery Act 2018* (Cth) (the **Act**). EOS is a public listed company incorporated in Australia whose registered office is situated at 18 Wormald Street, Symonston, ACT, 2609 and is the holding company of the group of entities as described in Appendix A¹

This Modern Slavery Statement sets out the steps EOS has taken to identify and prevent modern slavery in our business and supply chain during the reporting period of 1 January 2025 to 31 December 2025 and was approved by the board of directors of EOS in its capacity as the principal governing body of EOS in accordance with Act.

2. Modern Slavery

EOS is firmly committed to upholding the highest standards of integrity, ethics, and human rights across all aspects of its operations. As a global provider of advanced defence and space technologies, EOS recognises its responsibility to ensure that modern slavery², forced labour, human trafficking, and all forms of exploitation have no place within its business or supply chain.

EOS is aware of the impacts of modern slavery and that it is a significant problem with 50 million people living in situations of modern slavery, with 28 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 maintains a zero-tolerance approach to modern slavery. We expect all employees, contractors, and suppliers to adhere to our ethical standards and to operate in full compliance with applicable laws, including those relating to human rights and labour practices.

As part of our broader commitment to corporate responsibility, EOS actively promotes awareness of modern slavery risks within its workforce and encourages a culture in which ethical concerns can be raised without fear of retaliation. EOS requires 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

EOS remains committed to continuous improvement in this area and will regularly review its practices to strengthen its approach to preventing modern slavery, ensuring that its operations and supply chain align with both legal requirements and its core values.

3. EOS – An Overview

EOS is a technology company that began in 1983 in Canberra, Australia and remains headquartered in Canberra. Our global footprint has expanded in recent years and we now have on-the-ground operations in Australia, the United States, Europe, Singapore, the Middle East and New Zealand.

EOS creates leading-edge products and services for a range of applications in the defence, space and communications sectors and has been at the forefront of the defence and space sectors for over 40 years. This longstanding expertise enables us to bring new and innovative technologies to market.

EOS has developed a growing portfolio of products distinguished by precision, reliability and superior performance in real-world conditions.



Operations

EOS is a highly specialised technology company focused on the design, development, manufacture, and delivery of advanced systems for defence and space applications. Our operations integrate research, engineering, production, and long-term support, which enables us to deliver complex, high-performance solutions to governments and our other customers around the world.

EOS, as a long-established member of the global defence and space industries, has four decades of experience in designing, manufacturing and delivering innovative products and services to our customers.

EOS operates in two divisions: Defence Systems and Space Systems. EOS has a core capability in research and development which underpins our developments in new technologies. We invest heavily in developing our ideas to supply our customers with innovative and quality products in space domain awareness, space control, remote weapon systems and counter-drone solutions. Our core capabilities include the development, production and export of high energy lasers, thermal imagers, day cameras, gimbal units and laser rangefinders.

EOS' operational model is innovation-led, with continuous development cycles driving new product capabilities and technological improvements. Rather than producing standardised goods for open markets, we typically develop customised systems in response to specific contracts.

We work collaboratively with the Australian Government and organisations like ours worldwide and have strong partnerships to deliver our innovative products to our customers.

Organisation

EOS has offices and operations across the globe. EOS operates in:

- Australia (with operations and facilities in Victoria, the Australian Capital Territory, New South Wales and Western Australia)
- United Arab Emirates
- United States of America
- Singapore
- Germany
- New Zealand
- Netherlands
- United Kingdom
- France

Staff

As of 31 December 2025, EOS employed 436 staff across aforementioned countries in engineering, manufacturing and corporate roles. As of December 2025, the largest proportion of EOS' workforce was based in Australia.

EOS Global Workforce Breakdown

EOS Staff 2025	Number
Australia	272
New Zealand	13
Singapore	36
United States	63
United Arab Emirates	45
Germany	2
Netherlands	1
United Kingdom	4
Total	436

4. Supply Chain Details

EOS has a highly specialised, technology driven and vertically integrated supply chain that supports the development of advanced defence and space products. We engage 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.

EOS has an extensive and fragmented supply chain base which is involved in the manufacture of electronic and other equipment. EOS sometimes relies on the availability of customer vehicles or critical components from suppliers. It is an ongoing focus of EOS to continue to mature our supply chain.

We primarily source specialised materials and components of high specification which are not typically commercially standard items. Our suppliers of specialised components are sophisticated companies, and the majority of our suppliers are engaged in Australia. Our internal capabilities mean that we require little external and contracted labour. Areas where we do require contracted labour are generally highly skilled and technical professionals.

A defining feature of our supply chain is our focus on in-house engineering and manufacturing capability, which reduces our reliance on external suppliers for critical components. EOS designs and manufactures many key subsystems ourselves, including optical assemblies, tracking systems, and weapon integration components. By retaining control over core intellectual property and production processes, EOS is able to ensure quality, maintain technological advantage, and manage long-term obsolescence risks in our products.

EOS also provides sustainment and lifecycle support, which is particularly important given the long operational life of defence and space systems. EOS provides ongoing maintenance, upgrades, and technical support, ensuring that systems remain operational and technologically current over time.

With the growth of our global footprint, EOS has expanded into offshore manufacturing to scale its production. We maintain a critical and highly valued network of international suppliers, particularly within the countries we operate in.



EOS' VP of Supply Chain visiting a local supplier site.

Supply Chain Australia

EOS products are produced using Australian-owned and developed intellectual property. As at 2023 we sourced more than 83 per cent of the parts and 72 per cent of the value of every product from an Australian supply chain which comprised 146 local small and medium enterprises (SMEs).

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, Denmark and the Netherlands.

5. Risks of Modern Slavery

EOS considers that the risk of modern slavery occurring within our operations and supply chains is 'low'. EOS operates in sophisticated and advanced technology industries that are highly regulated. EOS' direct workforce is highly skilled and is largely located in low-risk countries (Australia, USA, EU). Our modern slavery risks arise primarily through indirect supply chains and third parties.

EOS' employee base, their work, and EOS' recruiting and hiring practices are intentionally implemented so as to endeavor to prevent labour exploitation and trafficking. We conduct pre-employment vetting and have processes to ensure that all employees are provided with documentation which clearly identifies their rights and responsibilities with EOS. 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;
- international suppliers further down our supply chain where we have less visibility. 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 strictly prohibits the use of slavery, forced labour and human trafficking and endeavors to require every member of its supply chain to meet the same legal and ethical standards as EOS demands of itself;
- entering into business arrangements with companies outside of Australia; and
- EOS' operations in countries identified as having elevated risks of forced labour and labour exploitation, 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 2025 reporting period, EOS:

- continued staff training on modern slavery and conducted in person presentations with our teams to educate our staff on the topic and to ensure staff were aware;
- established measures regarding fair labour practices and guidelines that create a respectful and safe work environment for our employees globally;
- implemented a supplier survey to assess new suppliers before contracting with them and which requires our potential suppliers to make an ethical trading declaration and disclosure of the supplier's current anti-slavery, forced labour and child labour practices;
- revised our supplier survey to further target modern slavery risks;
- completed six (6) supplier audits in 2025 which, among other things, enables us to assess the risk of modern slavery practices. We additionally conduct in-person audits and investigations of our suppliers and potential suppliers from time to time. For example, a team was sent on a 10-day trip to India in 2025, to among other things, assess their modern slavery risks and procedures to prevent modern slavery;
- undertook a mapping exercise of its suppliers, identifying who they are and where they are based, with the majority being in Australia;
- hired additional staff to support the Supply Chain team at EOS;
- maintained operations and manufacturing in multiple countries which provide flexibility in suppliers so that if a modern slavery risk was identified we could potentially mitigate the risk;
- 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 in accordance with our recruiting guidelines. These checks are conducted with the consent of the individual and are conducted by an independent party and protect the safety of employees;
- conducted extensive due diligence into the company we acquired;
- reviewed our risk management profile during the year via the Audit and Risk Committee to satisfy ourselves that it continues to be sound that EOS is operating with due regard to the risk appetite set by the board;
- updated our policy pertaining to modern slavery and we continue to review this document to ensure that it is meeting the required standard; and
- implemented local labour policies and practices to comply with the Act.

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;
- conduct due diligence on its customers;
- 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 to identify those parts of the business operations and supply chains where there is increased risk of modern slavery taking place;
- engage external consultants to assist with supplier reviews, audits, and other matters to support EOS' efforts;
- 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
- respond to any reasonable queries, concerns, or information suggesting elevated risks of modern slavery in accordance with our Modern Slavery Policy.

7. Assessment of Actions

EOS regularly reviews and assesses its policies and procedures to maintain up to date and effective practices and ensures that staff training is adequate and outcomes reflect best practice.

EOS has internal procedures to regularly report to the board on the risk profile of EOS and the controls we have in place to mitigate those risks. The board assesses this against the risk tolerance it sets, and our Audit and Risk Committee reviews our risk management profile during the year.

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 consulted with all the entities it owns and controls, as outlined in Appendix A. Internal consultation was undertaken with senior management who have oversight of the components of our operations and supply chain referenced in this Statement.

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:

15 June 2026

Appendix A – Entities

As of 31 December 2025:

- 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
- Sovereign Missile Alliance Pty Ltd
- FCS Technology Holdings Pty Ltd
- Australian Missile Alliance Pty Ltd
- Electro Optic Systems Advanced Technologies LLC
- EOS Innovation Singapore PTE LTD
- EOS UAE Holdings Pty Limited
- EOS Optronics GmbH
- EOS Netherlands B.V.
- EOS France SAS
- Electro Optic Systems Limited

Appendix B – References

1. <https://www.asx.com.au/markets/company/EOS>
2. see definition of Modern Slavery, Section 4, *Modern Slavery Act 2018* (Cth)
3. <https://www.walkfree.org/what-is-modern-slavery/>
4. Anti-Slavery Australia
5. <https://eos-aus.com/about-us/corporate-governance/>
6. <https://www.walkfree.org/global-slavery-index/>