

## **Theon International Plc ('THEON' or 'the Group')**

### **Modern Slavery Statement**

#### **INTRODUCTION**

THEON is committed to trading ethically, with zero tolerance for Modern Slavery (including human rights violations, child and forced labour or human trafficking in any form) in both its operations and supply chain. This is THEON's Modern Slavery Statement for the financial year ended 31 December 2024 and sets out the steps taken by THEON to prevent Modern Slavery in its business and supply chain.

#### **ABOUT THEON**

With over 28 years of expertise, the Group develops and manufactures cutting-edge night vision and thermal Imaging systems for Defense and Security applications with a global footprint. THEON started its operations in 1997 from Greece and today occupies a leading role in the sector thanks to its international presence through subsidiaries and production facilities in Greece, Cyprus, Germany, the Baltics, the United States, the Gulf States, Switzerland, Denmark, Belgium, Singapore and South Korea. THEON has more than 200,000 systems in service with Armed and Special Forces in 71 countries around the world, 26 of which are NATO countries. THEON has been listed on Euronext Amsterdam (AMS: THEON) since February 2024. [www.theon.com](http://www.theon.com)

#### **COMMITMENT TO SUSTAINABLE DEVELOPMENT**

The Group is committed to sustainable development, balancing economic viability with social responsibility and environmental stewardship. Its mission extends beyond providing superior systems. It encompasses reduction of its environmental footprint, enhancement of its social impact and fostering ethical growth. At the heart of its operations lies the commitment to environmental protection through sustainable practices, active support for vulnerable communities via targeted initiatives, the well-being of its employees, and an unwavering dedication to transparency and ethical conduct in all business relationships. To effectively integrate these values, the Group has developed a sustainability framework, as detailed in its Annual Report 2024 available on its website. [www.theon.com](http://www.theon.com)

In relation to its commitment to sustainable and ethical practices, THEON has the following approved policies amongst others:

- Code of Ethics and Business Conduct
- Environmental
- Health & Safety
- Procurement and Process
- Conflicts of Interest
- Diversity and Inclusion
- Whistleblowing

In 10.06.2025, THEON initiated the process of becoming a participant in the United Nations Global Compact, demonstrating its commitment to sustainable and ethical practices across its operations.

## **SUPPLY CHAIN MANAGEMENT**

THEON cooperates with an extensive network of suppliers both in Greece and abroad. The Group incorporates best practices and principles ensuring accountability and transparency, and thoroughly assesses all its suppliers prior to any collaboration, as well as evaluating existing suppliers on an ongoing basis.

The Group uses an international supply chain for the production of all components. The most relevant suppliers are spread across the EU (Germany, Greece, France, and Netherlands), Asia and the United States, with more than 90% being in Europe and the United States. In 2024, 92% of THEON's suppliers were foreign whereas 8% of its suppliers were from the local market (Greece).

Due to the strict regulatory requirements concerning the Group's products, the Group needs to abide by strict selection criteria, including pricing, accessibility, quality, track-record, and policies to ensure that also outsourced services and components and the relevant suppliers comply with such requirements. The Group also keeps a record of the approved suppliers and partners, which is updated every year ("Approved Suppliers-Partners"). For this reason, the Group maintains a Procurement Policy and Process for selecting its suppliers.

The Group recognises supply chain opportunities to positively contribute to societal change and align itself with global efforts and legislation aimed at the eradication of forced labour and modern slavery. Specifically, the Group acknowledges its potential to eradicate these practices by leveraging suppliers located in areas where human rights are violated. The Group aims to establish a good relationship and a long-term collaboration with its suppliers.

## **COMPLIANCE, TRAINING AND WHISTLEBLOWING**

Compliance issues are closely monitored on an ongoing basis ensuring both the smooth performance of the Group's contractual obligations and the adherence to the corresponding regulatory framework. To this end, the Group ensures its staff and employees periodically receive accommodated training and updates on any legal and regulatory developments that need to be strictly followed when doing business. External advisors and counsels are also engaged by the Group on an ad hoc basis.

The Group conducts its business activities in accordance with applicable anti-corruption laws, rules, and regulations, and its Code of Ethics and Business Conduct. The Group recognises the corrosive effect that corruption has on democracy and good governance and is committed to ensuring that the Group and those who conduct business on its behalf do so with integrity and the highest ethical business standards and in full compliance with the U.S. Foreign Corrupt Practices Act, the U.K.

THEON maintains arrangements and practices around whistleblowing (the Board of Directors of THEON approved the Whistleblowing Policy on January 19, 2024), which is aimed at encouraging

and urging all employees of the Group to report violations as soon as they come to their attention and to express concerns regarding violations.

#### **STATEMENT APPROVAL**

This statement was approved by the Board of Directors of THEON

