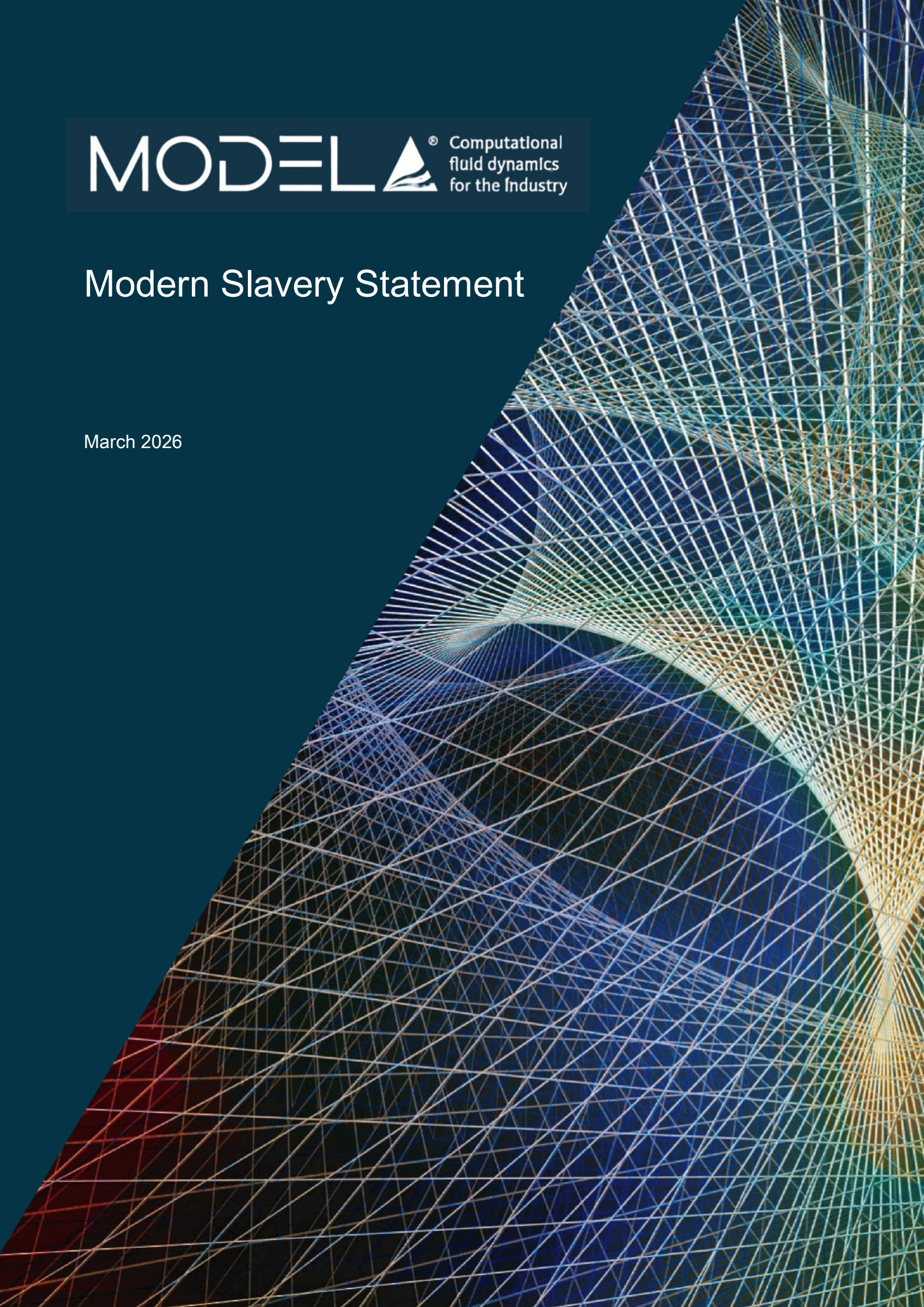


# Modern Slavery Statement

March 2026



## Modern Slavery Statement

Modela rejects all forms of modern slavery, servitude, forced or compulsory labour, human trafficking and child labour. We issue this statement as a formal expression of our commitment to operate and to maintain a supply chain that respects human dignity, responsible recruitment and corporate integrity.

### 1. Scope and nature of the statement

This statement applies to Modela's operations, business relationships and supply chains and is issued as a corporate declaration of zero tolerance for practices incompatible with fundamental human rights.

Where the issuing entity and its applicable legal threshold so require, this document may also serve as the basis for, or as, the annual statement for the purposes of supply-chain transparency required by the relevant United Kingdom legislation.

### 2. Organization and supply chain

Modela provides technical and digital services related to modelling, simulation and decision support. To deliver these services it engages with workers, advisers, contractors, technology suppliers, specialised providers and other third parties whose involvement may vary by service, jurisdiction and project type.

We recognise that risks of labour exploitation can be concentrated in certain geographies, subcontracting arrangements, labour-intensive services or supply chains with low visibility. For this reason, we adopt a proportionate, risk-based due diligence approach.

### 3. Governance and responsibilities

Modela's Management is responsible for approving this statement, reviewing its continued relevance and promoting reasonable controls to address modern slavery risks in operations and the supply chain.

Those responsible for procurement, contracting, third-party management and compliance must consider these risks in their decisions, escalate relevant red flags and cooperate with any necessary review, corrective actions or termination measures.

### 4. Principles and minimum expectations

Modela does not tolerate, directly or indirectly, forced labour, debt bondage, unlawful retention of documents, human trafficking, child labour, coercion, threats,

violence, unlawful restrictions on freedom of movement or any form of exploitation incompatible with human dignity.

We expect our suppliers, contractors and subcontractors to comply with applicable labour standards, maintain decent working conditions, promote transparent recruitment practices and impose equivalent requirements on their own supply chains where appropriate.

## 5. Due diligence and third-party selection

Modela will apply proportionate, risk-based review measures prior to contracting and throughout the relationship with relevant third parties. These measures may include public background checks, requests for information on labour practices, validation of contractual commitments, assessment of red flags and escalation of cases requiring enhanced review.

A lack of reasonable evidence, an unjustified refusal to cooperate or the identification of serious risks may lead to strengthened controls, demands for corrective actions, suspension of processes or rejection of the engagement.

## 6. Expectations on recruitment and working conditions

Modela expects that everyone working for the company or for third parties in its supply chain is employed under conditions that, at minimum, respect the following principles: freely chosen employment; no retention of passports or identity documents; no abusive recruitment fees; clear information on roles and terms of employment; payment in accordance with the law; rest periods and working hours compliant with applicable regulations; and reasonable mechanisms to raise concerns or file complaints.

Where freedom of association or collective representation is recognised by applicable law, we expect it to be respected. Where legal or contextual restrictions exist, we expect the third party to maintain legitimate alternative mechanisms for dialogue and protection.

## 7. Contracts, monitoring and corrective measures

Relevant contracts may incorporate human rights and supply-chain compliance obligations, requirements to cooperate with reasonable information requests, and powers to demand improvement plans or to adopt corrective measures.

If Modela identifies a serious risk or a practice incompatible with this statement, it will assess an appropriate response proportionate to the severity. Such responses may include remediation requirements, enhanced monitoring, suspension of activities, termination of the commercial relationship or escalation to authorities where appropriate.

## 8. Reporting, investigation and remediation

Anyone connected to Modela may report, through the corporate channels and the current independent channel, suspicions or indications of forced labour, trafficking, child labour or any other practice incompatible with this statement.

Reports will be handled confidentially, without retaliation and subject to a proportionate review. Where appropriate, Modela will promote containment, investigation, referral or remediation measures consistent with its role, capacity to intervene and the protection of affected persons.

## 9. Training and continuous improvement

Modela will promote awareness and training proportionate to risk for personnel involved in recruitment, third-party management, compliance and operations oversight, so they can identify red flags and escalate modern slavery risks promptly.

The effectiveness of this approach will be periodically reviewed considering incidents, observations, regulatory changes, evolving risks and lessons learned, and adjustments will be made to strengthen prevention, detection and response.

## 10. Review document control and approval

This statement will be reviewed at least annually, or sooner if there are material changes to operations, corporate structure, geographic scope or relevant supply-chain risks.

The current version must be kept under document control and made available in the Compliance Center.

## Approval

Approved by: Board of Directors of Modela Ltd.

Effective: from the date of publication.

Next review: March 2027, or earlier if required.



Rafael Muñoz Rubilar  
Compliance Officer