Modern Slavery and Human Trafficking Statement – Tungsten Automation

Introduction

Modern slavery and human trafficking remain tragic realities. Tungsten Automation unreservedly condemns these practices and is committed to improving our practices to combat them, in line with international standards including the UN Guiding Principles on Business and Human Rights and ILO conventions.

Our Business

Tungsten Automation is a global provider of technology solutions enabling digital workflow automation for businesses worldwide. Headquartered in Denver, Colorado, with over 2,200 employees operating in 32 countries, we serve more than 25,000 customers. Oversight of our modern slavery risk management is conducted at the executive level, with regular reporting to the Board of Directors.

Our Supply Chain

Our supply chain consists mainly of technology infrastructure providers. While we recognize that the risk of modern slavery varies, we are committed to identifying and addressing risks wherever they may arise. All suppliers are required to adhere to our Supplier Code of Conduct, which prohibits modern slavery and human trafficking, and these requirements are contractually embedded.

Risk Assessment and Due Diligence

We conduct regular risk assessments of our supply chain, leveraging both internal and external tools, and update our risk profile as our business and supply chain evolve. For higher-risk suppliers, we require detailed statements of their anti-slavery actions and may conduct additional due diligence, including third-party audits as appropriate.

Remediation and Whistleblowing

We encourage employees, suppliers, and stakeholders to report concerns through our whistleblower policy. If modern slavery is identified, we will take immediate remedial action, including support for affected individuals, cooperation with authorities, and, if necessary, termination of supplier contracts.

Training

Annual training is provided to employees involved in procurement, supply chain management, and key managerial roles to ensure high awareness of modern slavery risks.

Measuring Effectiveness

We monitor the effectiveness of our approach using key performance indicators, including the number of employees trained, supplier due diligence reviews completed, and incidents reported and addressed.

Further Steps

We will continue to enhance our risk assessment processes, supplier engagement, and employee training in the coming year.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Tungsten Automation's slavery and human trafficking statement for the financial year ending 31st December 2025. It has been approved by the Board of Directors of Tungsten Automation Group and is a joint statement on behalf of Tungsten Automation Group entities, including Tungsten Automation UK Limited.

For and on behalf of Tungsten Automation Group and its subsidiaries,

Greg Mermis

Chief Legal Officer

1st October 2026