

Modern Slavery and Human Trafficking Statement regarding the Financial Year of 2023

Introduction

This declaration is made in accordance with Section 54 of the United Kingdom Modern Slavery Act 2015 on behalf of LucaNet UK Ltd. LucaNet Group is a software company headquartered in Berlin, Germany with entities and offices in several countries around the world.

As a software company our supply chain has low risks in terms of modern slavery and human trafficking. Nevertheless, due to advancing globalization, our growing business and increasing business relationships abroad, we are committed to ensuring compliance with human rights.

Our Commitment

Through this statement, we commit to avoid any business practices that constitute human trafficking or slavery. This is to ensure that none of our businesses engage in modern slavery and that none of our partners benefit in any way from modern slavery.

It is the responsibility of all LucaNet employees to ensure compliance with all applicable modern slavery and human trafficking laws, including the UK Modern Slavery Act 2015.

Our Measures

Our measures to combat modern slavery and human trafficking have been identified within a risk assessment. As our daily business and services show no to low risks of modern slavery and human trafficking, nonetheless, we have implemented several preventative measures. Among others we have implemented a whistleblower system, enabling everyone to report any misconduct of modern slavery and human trafficking. Furthermore, we commit to the compliance of human rights through our Code of Conduct as well as our internal guidelines that are reviewed frequently and communicated regularly.

Implementation

Regarding the observance of human rights, we are committed to reviewing our organization and supply chains for forms of modern slavery, particularly in the context of recruitment, during employment and after termination of the employment relationship and to take appropriate measures to limit or completely prevent them.

We evaluate our approach to combat modern slavery and human trafficking frequently, using specific key performance indicator, and update our statement accordingly.



Elias Apel

Managing Director

LucaNet UK Ltd.
