

Report of the Hamilton companies Hamilton Bonaduz AG, Hamilton Medical AG, Hamilton Storage GmbH and Hamilton Services AG on due diligence with regard to conflict materials and child labor

Report pursuant to Art. 964j et seq. of the Swiss Code of Obligations (CO) and the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO)

The Hamilton companies Hamilton Bonaduz AG, Hamilton Medical AG, Hamilton Storage GmbH and Hamilton Services AG (hereinafter referred to as “Hamilton Switzerland”) and their subsidiaries recognize their social responsibility as an integral part of their global business activities. Hamilton is committed to conducting all activities in accordance with the applicable laws and regulations and in an environmentally and ethically responsible manner.

The Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO) governs companies’ due diligence and reporting obligations in accordance with Art. 964j–964l of the Swiss Code of Obligations (CO). These refer in particular to the handling of minerals and metals from conflict-affected and high-risk areas and to measures to prevent child labor.

In accordance with these legal requirements, Hamilton has published the following statement for the 2023/2024 financial year (for Hamilton Storage GmbH from July 1, 2023, to June 30, 2024 and for Hamilton Bonaduz AG, Hamilton Medical AG and Hamilton Services AG from December 1, 2023, to November 30, 2024).

Due diligence and reporting obligations in relation to minerals and metals

In the 2023/24 financial year, we reviewed whether, in accordance with Art. 964j para. 1(1) CO, the company had imported any minerals or metals (particularly tin, tantalum, tungsten or gold) that fall under the relevant customs tariff codes and exceed the applicable thresholds or had processed any such minerals or metals in Switzerland.

The review revealed that no such minerals or metals were imported into or processed in Switzerland over and above the defined thresholds during the reporting period.

Hamilton Switzerland is therefore not subject to any due diligence or reporting obligations in relation to minerals and metals from conflict-affected and high-risk areas in the 2023/24 financial year.

Due diligence and reporting obligations in relation to child labor

Ensuring the protection of human rights – especially the rights of children – is a top priority for us. In the 2023/24 financial year, we systematically reviewed our supply chains to check for potential risks related to child labor. We use the UNICEF Children’s Rights in the Workplace Index (hereinafter referred to as “the UNICEF Index”) as a guide for evaluating our products’ countries of origin accordingly.

Our analysis showed that the majority of our suppliers and/or the products purchased come from countries with a low risk of child labor (classification: Basic). Although some individual products originate from countries with an increased risk (classification: Enhanced), we were unable to identify any reasonable suspicion of child labor based on the information available to us, meaning that Hamilton Switzerland is not subject to any due diligence and reporting obligations in relation to child labor in the 2023/24 financial year.

Nevertheless, we have voluntarily decided to implement the requirements of the relevant due diligence and reporting obligations and to take proactive measures to systematically minimize potential risks related to child labor and other human rights violations in our supply chain, both now and in the future. This commitment underlines our clear dedication to ensuring ethically responsible and sustainable business practices.

1. Our commitment to protecting human rights

As part of our firm commitment to protecting human rights, we at Hamilton are actively engaged in making a lasting positive impact on the lives of people around the world. Respecting and promoting human rights throughout our supply chain is an essential prerequisite for us to achieve this vision.

In particular, we focus on ensuring the strict prohibition of child labor and any form of forced labor – both within Hamilton companies and among our business partners along the supply chain.

Our commitment to human rights begins within the company itself: With our binding code of conduct, we set clear standards in relation to human rights, child labor and forced labor. This code applies to all employees and is acknowledged as mandatory by those joining the company. Through targeted training, we ensure that employees are not only familiar with our principles, but also actively put them into practice.

However, our commitment also goes beyond the company: respect for human rights is a further key component of our approach to supplier management. We expect all our partners to adhere to the same high standards, and we systematically review this as part of our due diligence processes.

2. Our supply chain policy

Our management approach is based on a binding supplier code of conduct, which obliges them to uphold internationally recognized labor and human rights. A key element of this is the explicit prohibition of child labor, as defined by International Labour Organization (ILO) Convention Nos. 138 and 182.

In addition, this code makes it mandatory for our suppliers to implement their own due diligence processes within their supply chains. It gives Hamilton the right to access information and carry out audits, and it requires transparency and cooperation from suppliers with regard to verifying compliance with defined standards.

The supplier code of conduct was developed in 2024 and has since been gradually integrated into our framework agreements with our suppliers. The current focus is on suppliers that procure or supply products from countries that are classified as having an “Enhanced” or “Heightened” risk in the UNICEF Index.

We conduct systematic risk assessments using a “Supplier Management Risk Index” that maps country-specific risks such as child labor, sanctions, corruption and money laundering. Based on this index, we can formulate specific compliance requirements for specific suppliers.

Suppliers that operate from or provide products from high-risk countries are obliged to acknowledge the code of conduct and confirm their compliance with it. If they fail to do so, we reserve the right to exclude these suppliers from our portfolio.

3. Our supply chain traceability system

In order to ensure traceability in the relevant risk areas in the long term, we are continuously working to integrate the relevant data from our procurement into our system. The information collected and documented by our Procurement department is supplemented and updated on an ongoing basis. The aim of this is to systematically improve the database for traceability in our supply chains.

Our supplier code of conduct also obliges suppliers to actively support us if necessary and to ensure the necessary transparency with regard to potential human rights risks, particularly in relation to child labor.

4. Our reporting procedure for identifying risks

Since the end of 2023, Hamilton has had a structured reporting procedure in place that gives all individuals the opportunity to report grievances, including ones relating to potential or actual violations of human rights, which includes cases of child labor.

Concerns can be submitted by any person, either anonymously or in the reporter's name, via Hamilton's whistleblower reporting office (<https://hamilton.integrityline.io>). All information reported is checked carefully and investigated. When assessing potential compliance risks, we involve external specialist bodies where necessary. Relevant findings are forwarded to the Executive Board in an appropriate manner.

When reviewing reports, we guarantee the utmost confidentiality and take measures to protect the whistleblower's identity – regardless of whether the report was made anonymously or not.

Our suppliers are also expressly required to inform us of any possible violations of applicable rights and laws or the supplier code of conduct.

No reports or complaints relating to child labor have been received since the reporting procedure was introduced at the end of 2023.

5. Our risk management system

Detecting and assessing risks early on is a key component of our compliance approach. The aim is to identify potential weaknesses or violations – particularly with regard to human rights and child labor – at an early stage and to counteract them effectively. Our risk analysis helps us to systematically identify, assess and manage compliance risks in a risk-appropriate way to ensure that our business activities comply with applicable laws, internal regulations and ethical standards.

Our risk management system is incorporated into our overarching Enterprise Risk Management. Specific compliance risks are derived from our Enterprise Risk management and then refined. Risk analysis with regards to compliance risks follows the structured approach: (i) Identification of relevant risks; (ii) Risk assessment and prioritization; (iii) Development and implementation of appropriate measures.

In the context of child labor, we see the greatest – albeit largely abstract – risks in the upstream supply chain, especially in the case of products from countries of origin with an increased risk. Based on these findings, we take targeted risk minimization measures, such as the targeted implementation of our Code of Conduct for suppliers with products from high-risk countries and the continuous expansion of our database, as well as through training, controls, and process optimization.

Through this strategy, we aim to ensure that we meet our strict compliance requirements and prevent any form of legal violations at an early stage, especially in sensitive areas such as child labor, to the best of our ability.

Approved by management in May, 2025