

 OpenWeather	Human Resource Management Document applicable to OWM Group Ltd, including its subsidiaries OpenWeather Ltd, Extreme Electronics Ltd, and Ulla Technology Ltd (further “the Group of Companies”)	No. HRM-POL-005
Name of Document: Modern Slavery Policy		Issue Date 08/04/2026

Modern Slavery Policy

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VERSION HISTORY

Version	Date Issued	Brief Summary of Change	Owner's Name
V1.1	08/04/2026	Updated to strengthen alignment with the Modern Slavery Act 2015 and proportionate supply chain due diligence.	Olga Buskin
V1.0	12/05/2025	Initial version	Olga Buskin

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1. Policy Statement

OWM Group Ltd, including its subsidiaries OpenWeather Ltd, Extreme Electronics Ltd and Ulla Technology Ltd (further “the Group of Companies”) recognises its legal and ethical responsibilities to operate with integrity, respect human rights, and take proportionate steps to reduce the risk of modern slavery. Although the Group of Companies is not currently subject to the statutory reporting requirement under section 54 of the Modern Slavery Act 2015, it adopts this Policy voluntarily as part of its commitment to ethical business conduct and human rights. We will take proportionate and reasonable steps to prevent slavery, forced labour, servitude, and human trafficking within our business and within the supply chains through which we operate.

2. Commitments

The Group of Companies operates to ensure fairness in the recruitment, retention and development of all employees and it seeks to comply with all applicable employment legislation.

The Group of Companies seeks to provide a work environment where employees are treated with respect, dignity and consideration.

The Group of Companies has a zero-tolerance approach to slavery and human trafficking and expects the same commitment from its contractors and supply chain partners. We are committed to working to prevent modern slavery and human trafficking in any part of our business and, so far as reasonably practicable, within our supply chains.

As part of our commitment to identify, prevent, and address slavery and human trafficking within our business and in those businesses with which we interact, we will work closely with our supply chains to support compliance with legislative obligations and we expect those organisations to have suitable anti-slavery and human trafficking policies and processes.

We seek to build long-standing relationships with suppliers and to make clear our expectations of ethical business behaviour from them.

The Group of Companies expects suppliers to adhere to our values. We will work with suppliers to help them meet our supplier commitments through proportionate, risk-based due diligence, which may include supplier questionnaires, contractual controls, document reviews, certifications, and meetings where appropriate.

3. Training and Awareness

We will provide regular training and awareness programmes for employees, managers, contractors, consultants and those involved in recruitment, procurement, and supply-chain management. This training will focus on identifying the signs of forced labour and modern

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slavery, understanding individual and organisational responsibilities, and reporting concerns safely and confidentially.

Induction training will cover sustainability principles and the requirements of this Policy, followed by periodic refresher and specialist modules for employees in high-impact functions or operational roles.

Any employee, contractor, consultant, supplier, or other stakeholder who suspects modern slavery, forced labour, or human trafficking in connection with the Group's business or supply chain must report the concern promptly through the appropriate management, procurement, grievance, or whistleblowing channels. All concerns will be taken seriously and handled appropriately and confidentially.

4. Continual Improvement and Review

We will continue to develop our approach to tackling the issue of Modern Slavery, as issues may evolve and require a different approach as improved/more information in the supply chain becomes available.

We also commit to annually review how we can be more effective in collaborating with both customers and suppliers to support our approach to Modern Slavery.