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# Modern Slavery Act Statement

by Unite for the Financial Year 2025

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## A Purpose of the statement

This statement has been made by Unite Procurement Deutschland AG in accordance with Section 54 of the UK Modern Slavery Act 2015 for the fiscal year ending 31 December 2025. It details the measures undertaken by Unite Procurement Deutschland AG and its subsidiary Unite Procurement UK Ltd. during this period to mitigate the risk of modern slavery or human trafficking within our operations and supply chain.

## B Corporate structure

Unite Procurement Deutschland AG, which manages the procurement platform [www.mercateo.com](http://www.mercateo.com), is headquartered in Munich and is a wholly owned subsidiary of Unite Network SE.

Instead of having its own employees, Unite Procurement Deutschland AG's services are delivered by Unite Services GmbH & Co. KG, another wholly owned subsidiary of Unite Network SE.

The London-based Unite Procurement UK Ltd. operates the procurement platform [www.mercateo.co.uk](http://www.mercateo.co.uk). It is a wholly owned subsidiary of Unite Procurement Deutschland AG.

Unite Procurement Deutschland AG and Unite Procurement UK Ltd. are part of Unite, which has a presence in twelve European countries.

## C Business Model

At Unite, we connect the economy for sustainable business.

Our e-procurement platform, comprising the integrated Mercateo B2B Marketplace and Procurement Portal, facilitates seamless sourcing and procurement for commercial enterprises and public sector entities.

Bringing buyers and suppliers together for mutual benefit, Unite has established a solid foundation of fair competition and dependable partnerships.

The platform's scalable infrastructure supports business connections, stable procedures, and a robust supply chain. We're revolutionizing e-commerce for the private and public sectors, infusing and dispersing value across regional markets and communities for the collective good under the motto: "For better business and a better world".

## D Preventing modern slavery in our company

Unite Procurement Deutschland AG has no employees of its own. Instead, its services are delivered by Unite Services GmbH & Co. KG, which is also owned by Unite. In the year under review, Unite Services GmbH & Co. KG had over 600 employees on its payroll, while Unite Procurement UK Ltd. employed thirteen members of staff.

Below, we address the measures taken in 2025 to counteract modern slavery within our business framework.

### 1 Corporate values and culture

Back in 2019, in collaboration with our staff, we carved out and defined our distinct corporate values encapsulating the ethical ethos of Unite. Our business model is based on these values, which serve as our 'cultural compass', directing our course of action. Our values are:

- **Sustainability:** We champion the wellbeing and personal development of our employees.
- **Diversity:** We believe that everyone has unique characteristics that benefit us all.

- **Trust:** We trust our employees and allow them to work independently. We're well aware that to err is human.
- **Fairness:** Our decisions are rooted in fairness and transparency, and we treat others as we'd like to be treated ourselves.
- **Courage:** Go on, you can do it!
- **Humanity:** We accept people's strengths and weaknesses and never regard them as mere cogs in a machine.

Our intrinsic corporate values elucidate that at Unite, the wellbeing and needs of individuals are paramount, and that we take a genuine interest in each other. While every employee is entrusted with upholding and enacting these values, overarching accountability resides with the company management. Collectively, we strive to ensure that modern slavery finds no foothold within our operations.

We urge our staff to continually reflect on and critically assess both personal actions and broader company operations. This introspection bolsters unity and enhances individual welfare.

## 2 Unite Code of Ethics & Conduct

From the outset, Unite has anchored its operations in social, ethical and environmental standards. These tenets are embodied in our Unite Principles of Conduct, highlighting the core values we champion. Conscious of our deep-seated responsibility towards people, society and the planet, we view these principles not just as benchmarks, but as minimum requirements for our business activities. They play a pivotal role in guiding our ethical and social interactions in our day-to-day operations. These principles convey our dedication and convictions, providing clarity and direction in challenging times. By fostering a collective spirit and mutual trust, they underscore our shared values and aspirations. As such, the Unite Principles of Conduct are the defining hallmarks of our actions.

In 2025, we took a significant step forward by formally consolidating these principles into our Code of Ethics & Conduct (publicly available [on our website](#)), which came into effect on 1 December 2025. The Code applies to all employees, board members and contracted self-employed individuals across Unite. It sets out our core values and translates them into concrete standards of behaviour, with particular focus on three critical areas: people, the environment and business protection. In the area of people, the Code explicitly prohibits any form of forced or child labour, upholds the standards of the International Labour Organization and the International Bill of Human Rights, and commits Unite to fair working conditions, diversity, equity and inclusion, and protection from harassment and abuse. The Code is publicly available and reviewed at least annually to ensure it remains current and effective.

## 3 Unite Academy

We're keen to support our employees' professional and personal development. We therefore offer them various opportunities to acquire skills, embrace new challenges, and realize their professional aspirations. We deliver company-specific learning content through our learning platform. Our proprietary learning platform disseminates tailored educational content. We also curate workshops spanning communication, conflict resolution, adaptation to change, and bespoke training modules to nurture personal development.

## 4 Culture Circle

Unite has a Culture Circle, a committee that was first elected by secret ballot in 2022 by all members of staff. Voted in for a three-year term, the Culture Circle comprises ten representatives from different parts of Europe who deal with cultural and organisational matters. Periodic meetings with the Executive Board facilitate the discussion of insights, projects and innovations.

Acting as a trusted channel between employees and management, the Culture Circle operates on four core principles — confidentiality, trustworthiness, neutrality, and braveness — to foster a cross-border and collaborative atmosphere where every voice is genuinely heard.

The members of the Culture Circle have developed the following vision for their activities:

- We are the ears and the voice of every Unitee.
- We promote and develop our Unite values.
- We support a culture where everyone can be heard and seen.
- We for ALL.

Guided by these commitments, the Culture Circle's mission is to foster a cross-border and collaborative atmosphere where open dialogue, mutual respect, and shared values unite colleagues across all geographies. It ensures that cultural and organisational matters are addressed with the care and accountability that every Unitee deserves.

#### 5 Support for voluntary work

We encourage our employees to make a difference in the world beyond Unite, be it through regional philanthropy or spearheading international aid initiatives. Volunteering plays a crucial role in our company. Individuals not only drive change through their voluntary work, but also directly contribute to a more positive social environment. To enable participation in such ventures and to meaningfully contribute to society, Unite offers its employees special leave entitlements over and above their standard holiday allocation.

Immediately after the outbreak of the war in Ukraine, we established Unite with Ukraine, organised relief efforts and provided donations. With our employees' support, we partnered directly with humanitarian organisations such as the Association for Worldwide Emergency Aid and the Hof Schlueter Foundation. Leveraging our expansive infrastructure in countries neighbouring Ukraine, we ensured that aid was directed to the regions most in need. Collaborating with our extensive network of suppliers and business affiliates, we orchestrated and funded the delivery of critical medical supplies and essential commodities to distressed zones.

#### 6 Diversity at Unite

Unite employs people from 40 different nations.

At Unite, our DE&I Employee Resource Group is driven by a dedicated team of individuals from diverse geographies and unique backgrounds, all sharing a common passion for building an inclusive workplace. Our journey is rooted in the fundamental belief that diversity of thought and experience is a powerful catalyst for growth. Central to our mission is the commitment to truly see and appreciate one another — not just as colleagues, but as individuals with unique stories, aspirations, and dreams. Together, we foster a workplace where recognition, respect, and inclusion are at the heart of everything we do.

In 2024, we took a significant step forward by working on the implementation of our Diversity, Equity, and Inclusion (DEI) Policy, designed to foster an environment where every individual feels valued, respected, and provided with equal opportunities for growth. By embracing differences across teams, Unite strengthens innovation, collaboration, and its ability to serve a global community. Unite's commitment ensures that everyone, regardless of background or identity, can thrive both within the organisation and in its partnerships.

To celebrate the planned introduction of the DEI policy, Unite held the second annual DEI Day in November, featuring a vibrant meet-and-greet with colleagues from all over the world in traditional or expressive attire, a global feast, and a quiz about the traditions of different countries. On the World Day for Cultural Diversity for

Dialogue and Development, an interview was also published with an inspirational career coach who advocates for the value of diversity in business, further strengthening our ongoing commitment to promoting dialogue and understanding within and beyond our organisation.

As part of our commitment to welcoming and including diversity in our corporate culture, we are a proud signatory of the German Diversity Charter. By adhering to the principles of the Charter, we actively foster an environment where every individual is respected and empowered, ensuring equal opportunities for all to reach their full potential. This dedication reflects our belief that a truly inclusive workplace not only enriches our organisation but also drives our collective success.

In 2025, our DEI Employee Resource Group marked another milestone with DEI Day 2025, celebrated as part of We Week on 25th June. Employees were encouraged to wear something reflecting their unique background and heritage — a visible expression of the diversity that defines our global community. The event featured a live stand-up comedy set by comedian Tim Whelan, whose sharp wit and relatable humour brought shared laughter and connection across our workforce. The performance was followed by a thought-provoking Q&A session with a Board Member, exploring why Diversity, Equity and Inclusion truly matters at Unite. Other Unite subsidiaries also took part in DEI-related events and training sessions, actively participating in initiatives aimed at raising awareness and building skills around diversity, equity, and inclusion.

Through these and other employee-led initiatives, we reinforce our dedication to diversity, equality and inclusion as we strive to create a workplace where every employee feels valued and respected.

### **7 Smart Work @ Unite**

At Unite, we offer our employees a choice of three distinct Smart Work models, catering to their unique requirements and promoting an optimum work-life balance. These models contain different ratios between attendance time in the office and working from home. The model chosen by each member of staff is set out in their employment contract.

We offer our employees flexible working hours. Only in operational sectors are fixed core working hours or service hours defined, which are compliant with legal standards. Each staff member is entitled to sufficient break periods, and any overtime is compensated via time off in lieu.

Our office premises offer complimentary non-alcoholic beverages to all employees.

### **8 Fair pay**

We firmly believe that good work must be rewarded commensurately and fairly. That's why we pay our employees more than the statutory minimum wage.

### **9 Workations and sabbaticals**

Unite's workation scheme allows employees to work remotely from locations of their choice which would typically be their holiday destinations for a mutually agreed period. This flexibility enables staff to combine work with their personal well-being.

Additionally, Unite provides the opportunity for employees to take a sabbatical.

All key information regarding these options is readily available and clearly outlined on the intranet, ensuring that employees are well informed about the requirements and possibilities.

### **10 Holiday and illness**

Unite prioritises the physical and emotional wellbeing of its staff. After all, a healthy company needs healthy employees.

We offer each employee a holiday allowance that exceeds the statutory minimum. The leave application and approval process are supported by an electronic system. This enables employees to check their current holiday entitlement status at any time.

Whenever employees are sick, we grant them two days' recuperation leave. During this time, the employee is released from work even without a medical certificate.

Our proactive wellness initiatives encompass various preventive programs. For our German workforce, we've instituted a health management team dedicated to ensuring their peak physical and emotional wellbeing. This acclaimed program – recognized by Barmer health insurance's Health Care Award – includes physical activities, ergonomic guidance, and complimentary counselling sessions. Moreover, Unite Procurement UK Ltd. staff can access online occupational health services.

Furthermore, we offer a professional mental health service available to all employees, which is accessible 24/7 in multiple languages. It includes webinars, individual sessions and group workshops with qualified psychological experts. The service ensures complete confidentiality and anonymity: personal data such as names or email addresses are never shared or stored. Only the number of registered and active users is reported in aggregate, ensuring privacy for all participants. Sessions are securely conducted via an easy-to-use web platform, accessible from any personal device.

### **11 Teamecho**

To ensure every employee feels heard and valued, since the end of 2023 our company has introduced Teamecho, an anonymous survey tool managed by an external provider. The platform offers scientifically validated question sets to explore key topics such as motivation, well-being, leadership, and collaboration. Participation is entirely voluntary, with responses encrypted and anonymized. The results are only shown when a minimum number of responses is reached. In this way, Teamecho amplifies the voice of our employees, both within their teams and across the entire organization, by surfacing insights that are valued by managers and our board. It strengthens our understanding of team dynamics, supports meaningful dialogue, and fosters a culture of openness, trust and continuous improvement.

### **12 External audits and certificates**

We undergo audits and have the quality of our procedures checked and evaluated by external rating agencies.

In 2024, we were awarded the EcoVadis Gold rating for our CSR activities, reflecting our significant and ongoing commitment to sustainability and excellence. We are scheduled to resubmit for this evaluation in 2026.

We have proudly held the Fair Tax Mark since 2022. This endorsement from the Fair Tax Foundation underlines our dedication to transparent and responsible tax practices.

### **13 Unite participation in the UN Global Compact**

From 2024 we have joined the UN Global Compact, which is a platform for businesses to align their strategies and operations with the UN Sustainable Development Goals and human rights principles. This underscores our commitment to responsible and sustainable business practices on a global level.

### **14 Whistleblowing System available to employees**

To safeguard our ethical standards, we've instituted a [whistleblowing system](#). This mechanism offers our team a confidential channel to voice concerns over potential breaches of our guidelines. Its main aim is to provide whistleblowers with a safe environment for communication, ensuring they're shielded from any retaliatory action. Whistleblowers can flag issues anonymously. Upon receiving a report, we're committed to thoroughly investigating any allegations and promptly addressing them. Each report is rigorously investigated, and any hint of modern slavery within our operations is swiftly escalated to senior management for decisive action.

## E Preventing modern slavery among our service providers

Our operations often incorporate the expertise of carefully chosen service providers.

### 1 Responsible IT outsourcing

In the realm of software development, for many years we've been working closely with a consulting firm specialising in high-end IT. We share a longstanding, equitable partnership with this consultancy. Our relationship is governed by a detailed written contract, which also ensures that employees' rights are protected by the consultancy. We engage these employees on a project basis, affording them the same duty of care we provide to our in-house team.

### 2 Fair agreements with Freelancers

We work with freelancers on a project basis. They're provided with comprehensive access to essential tools and information to fulfil their tasks.

Their terms are contractually agreed in advance, and they're paid on the basis of pre-defined hourly rates. When negotiating daily rates, we ensure that they represent fair, appropriate remuneration for the work to be done.

## F Preventing modern slavery in our supply chain

Our primary goal is to provide our customers in every country with the greatest possible variety of items for tail spend procurement. The focus is always on competitive terms, a comprehensive product range, and efficiency. We currently work with more than 1,000 vetted suppliers at every level of commerce from the EU, Switzerland and the UK in 12 European countries.

Our unwavering commitment ensures that both our supply chain and our associated partners maintain rigorous standards to prevent the incidence of modern slavery within their operations and supplier networks.

Below we detail our endeavours in the year under review to prevent modern slavery in our supply chain.

### 1 Managed Supply Programme

Our suppliers aren't just vendors; they're also strategic partners. We champion personal interactions, collaborative efforts and long-term associations. This enables us to shape our clients' procurement processes efficiently and sustainably. Under our Managed Supply Programme, we regularly keep in touch with our suppliers, as we believe that tackling modern slavery requires a collective effort. Suppliers undergo an audit during the onboarding process. To achieve more transparency in our supply chain, we continually improve our processes and procedures.

### 2 Code of Conduct for our business partners

The Code of Conduct for our business partners (publicly available [on our website](#)) describes the essential requirements our business associates are expected to meet. For a supplier to be integrated into our platforms, they must solemnly commit to upholding human rights, ensuring human dignity, safeguarding the environment, and so on. We ask our suppliers to confirm that no one is employed against their will or forced to work under physical or mental duress. We also demand fair remuneration. Our stipulations echo the labour and social standards of the International Labour Organization, the principles of the International Bill of Human Rights, and the pertinent legal provisions.

We expect our partners and suppliers to fully accept and actively support these principles throughout the supply chain. The Code of Conduct for our business partners is part of every agreement we conclude with our suppliers.

In 2026, we will update the Code of Conduct for our business partners to ensure it is fully aligned with the legal requirements, corporate principles and structure of our internal Code of Ethics & Conduct, which came into effect on 1 December 2025, further strengthening the consistency of our compliance framework across all business relationships.

### 3 Human rights risk assessment and analysis of environmental risks

At Unite, we are committed to sustainable business relationships and want all platform participants to benefit from our network. Unite recognises its responsibility to respect human rights and protect the environment within the supply chain.

Although Unite's workforce is below the size threshold specified by the EU Corporate Sustainability Due Diligence Directive (CSDDD), we proactively address the resulting due diligence obligations across our operations. Being a responsible company, we have taken voluntary measures to align with the standards set out by this act.

To this end, we have implemented osapiens supplier os (LkSG), a dedicated software solution that supports us in risk analysis and risk management across all markets in which Unite operates. An abstract risk analysis is conducted for all markets, while in 2024 a concrete, risk-based analysis was carried out specifically on the German market. We carefully assessed our suppliers against the standards and requirements of the LkSG. The tool assists Unite in identifying, assessing and prioritising human rights and environmental risks within the supply chain, as well as managing corrective and preventive measures. This risk analysis is conducted annually and on an ad hoc basis as needed.

### 4 Promoting diversity with MSDUK

We intend to foster greater diversity within supply chains across Europe. As a member of MSDUK (Minority Supplier Development UK), we're part of a community championing British businesses owned by ethnic minorities and collaborating to build a more inclusive economic landscape.

### 5 Whistleblowing System available to business partners

We have a [whistleblowing system](#) in place. As outlined in our Code of Conduct for our business partners, they are obliged to promptly report any breaches. Each report is treated with utmost seriousness, ensuring a comprehensive investigation and swift resolution. Reports can be submitted anonymously, and safeguarding whistleblowers is paramount. All reports are dealt with confidence. The system provides whistleblowers with a safe environment for open communication, ensuring they're shielded from any backlash.

Moreover, we hold our suppliers to the same standards, necessitating them to implement appropriate grievance mechanisms for their workforce.

Should instances of modern slavery emerge within our supply chain, they are escalated immediately, prompting rigorous action by our senior management to eliminate them.

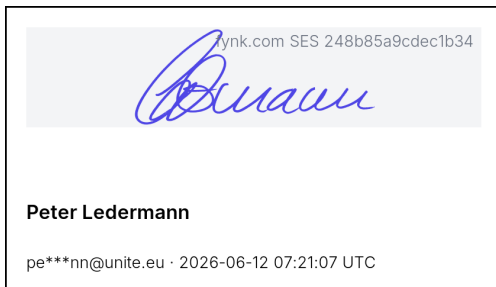
## G Proactive commitment

To ensure that the above measures effectively prevent modern slavery in our business operations and supply chain, they're subject to regular scrutiny to gauge their effectiveness. We consider all aspects of our business and the supply chain to enable robust due diligence while adhering to all legal mandates. We strive to continuously improve the procedures we implement.

Although Unite's workforce size means it doesn't yet fall under the scope of application of the German Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz*), we have already proactively addressed due diligence in the supply chain in the German market. As anticipated in our previous 2024 statement, we have gradually extended the risk assessment to all markets in which Unite operates by the end of 2025, focusing on suppliers with heightened human rights and environmental risks.

In 2025, Unite worked towards the voluntary publication of its first Sustainability Report in accordance with the Voluntary Sustainability Reporting Standard (VSME), going beyond our current legal reporting obligations. This initiative reflects our intrinsic commitment to transparency, responsible business practices, and continuous improvement across environmental, social and governance dimensions — including our ongoing efforts to prevent modern slavery and uphold human rights throughout our operations and supply chain.

**Signed**



Board Member and Managing Director of Unite Procurement Deutschland AG  
and Director of Unite Procurement UK Ltd.