

FLiITS Human Rights & Modern Slavery Policy

FLiITS Germany GmbH

Effective date: September 2026 | Version: 1.0 | Approved by: Managing Director

1. Our Commitment

FLiITS Germany GmbH ("FLiITS") is committed to respecting human rights and providing safe, fair and lawful working conditions for all employees, couriers, contractors and business partners.

We have zero tolerance for forced labour, modern slavery, human trafficking, child labour, exploitation, discrimination or any form of coercion in our own operations or in our business relationships.

FLiITS is committed to conducting its business in accordance with applicable German and European employment, social-security, occupational-health-and-safety and human-rights requirements.

This policy forms part of FLiITS's broader compliance framework and is particularly relevant to our courier operations and relationships with customers, suppliers, recruitment partners and other service providers.

2. Forced Labour and Modern Slavery

FLiITS strictly prohibits:

- forced or compulsory labour;
- human trafficking and exploitation;
- slavery or slavery-like practices;
- debt bondage;
- withholding of passports, identity documents or other personal documents;
- coercion, threats or intimidation in connection with employment;
- charging employees recruitment fees or similar payments as a condition of employment;
- employment arrangements designed to conceal the identity or employment status of workers.

Employees must be free to enter into and leave employment in accordance with applicable law and their contractual obligations.

FLiITS does not tolerate any practice that restricts a worker's freedom of movement or ability to make an independent decision about their employment.

3. Fair Employment and Remuneration

FLiITS is committed to lawful and transparent employment practices. We will:

- provide employees with appropriate employment documentation;
- comply with applicable minimum-wage requirements;
- ensure appropriate registration with the relevant social-security authorities;
- pay employees accurately and on time;
- maintain appropriate working-time and payroll records;
- comply with applicable requirements concerning working hours, rest periods and leave;
- provide employees with information regarding their employment conditions.

No employee will be required to make unlawful deductions from their remuneration or pay fees in order to obtain or retain employment.

4. Recruitment and Right to Work

FLiITS will conduct appropriate checks before employees commence work, including verification of their identity and, where applicable, their legal right to work in Germany.

Where recruitment agencies or other external recruitment partners are used, FLiITS expects such partners to comply with applicable law and with the principles contained in this policy.

FLiITS does not permit recruitment partners to charge employees recruitment fees or engage in deceptive, coercive or exploitative recruitment practices.

5. Health, Safety and Working Conditions

FLiITS is committed to providing a safe working environment for employees and couriers. We will implement appropriate measures relating to:

- occupational health and safety;
- risk assessment;
- safety training and instruction;
- appropriate personal protective equipment where required;
- safe use and maintenance of work equipment;
- accident reporting and investigation;
- prevention of excessive physical and mental fatigue.

Employees and couriers are expected to follow applicable safety instructions and report unsafe conditions or incidents without fear of retaliation.

6. Equal Treatment and Respect

FLiITS does not tolerate discrimination, harassment, bullying or retaliation.

All employees and couriers should be treated with dignity and respect irrespective of their background, nationality, gender, age, disability or other legally protected characteristic.

Employees must be able to raise concerns regarding working conditions without fear of punishment, discrimination or retaliation.

7. Suppliers and Business Partners

FLiITS expects its suppliers, contractors, recruitment partners and other relevant business partners to respect the principles set out in this policy.

Where appropriate and proportionate to the level of risk, FLiITS may:

- conduct compliance checks during supplier onboarding;
- request relevant documentation;
- include human-rights and employment requirements in contractual arrangements;
- request corrective action where concerns are identified;
- conduct or commission audits or other appropriate checks.

FLiITS does not knowingly engage with business partners that use forced labour, human trafficking, child labour or other serious exploitative practices.

8. Reporting Concerns

FLiITS encourages employees, couriers and business partners to report concerns regarding:

- forced labour or human trafficking;
- exploitation or coercion;
- unlawful employment practices;
- wage or working-time violations;
- unsafe working conditions;
- discrimination or harassment;
- unauthorized subcontracting;
- other serious breaches of this policy.

Reports will be handled appropriately, confidentially where possible and in accordance with applicable law.

FLiITS prohibits retaliation against any person who raises a concern in good faith.

9. Investigation and Remediation

Where FLiITS becomes aware of an actual or suspected violation, the company will assess the matter promptly and take appropriate action. Depending on the circumstances, corrective measures may include:

- investigation and documentation of the incident;

- immediate measures to protect affected workers;
- correction of payroll or employment issues;
- additional training or controls;
- corrective-action plans for suppliers or business partners;
- suspension or termination of a business relationship where serious violations are identified;
- notification to relevant authorities where legally required.

Our objective is to prevent, stop or mitigate human-rights violations and to continuously improve our controls.

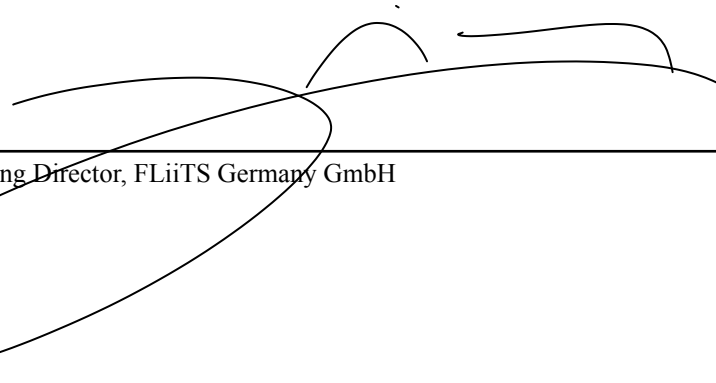
10. Governance and Review

The Managing Director is responsible for the overall implementation of this policy. Relevant responsibilities may be delegated to HR, Operations or other appropriate functions.

FLiITS will periodically review the effectiveness of this policy and update it where necessary, particularly when there are significant changes to our business model, workforce, suppliers or risk profile.

This policy will be communicated to relevant employees and, where appropriate, business partners.

Approved by:



Jose Cudell — Managing Director, FLiITS Germany GmbH

Date: September 2026

Management Statement

FLiTS believes that responsible growth requires respect for the people who make our business possible. We are committed to maintaining a working environment in which every employee and courier is treated fairly, paid lawfully, works under safe conditions and can raise concerns without fear of retaliation.

FLiTS Germany GmbH
Düsseldorf, Germany