



Modern Slavery Act Statement of Compliance

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes Xaar plc’s slavery and human trafficking statement for the financial year ending 31 December 2025.

Xaar plc (registered number 03320972) and its subsidiaries (including Megnajet Limited, Pad Print Machinery of Vermont d/b/a EPS and Xaarjet Limited) is committed to preventing slavery and human trafficking in all forms throughout its operations and supply chains. Xaarjet Limited is the only operating subsidiary within the Xaar group which has met the reporting criteria of the Act.

Our Structure, Business and Supply Chains

Xaar plc is a UK headquartered technology company listed on the London Stock Exchange and located in Cambridge. It is a leading supplier of industrial inkjet technology, manufacturing piezoelectric drop-on-demand inkjet printheads and associated products. Its business operates globally, with direct operations in the United Kingdom, Sweden, China and the United States.

Our supply chain includes:

1. **Raw materials and components:** Suppliers of electronic components, ceramics, metals and specialised materials used in printhead and ink systems manufacturing;
2. **Manufacturing equipment and tooling:** Suppliers of precision manufacturing equipment and specialist tooling;
3. **Professional services:** Legal, financial, consulting and technical service providers; and
4. **Office and facilities services:** Providers of IT infrastructure, telecommunications, facilities management and office supplies.

As a technology company, Xaar recognises that certain elements of its supply chain, particularly those involving raw materials extraction, component manufacturing in regions with higher modern slavery risks and lower-tier suppliers, may present elevated risks of modern slavery.

Our Policies in Relation to Modern Slavery and Human Trafficking

Xaar has established comprehensive policies to ensure it conducts business ethically and in compliance with applicable laws, including the Act. Xaar’s internal policies sets out its zero-tolerance approach to modern slavery and provide guidance to employees on identifying and reporting concerns. Xaar’s Code of Conduct reinforces those principles further. These policies, together with its Whistleblowing Policy, enable Xaar employees to report any issues which they may encounter at work. Suppliers are required to uphold high standards in compliance with the Act through appropriate levels of due diligence and agreement to the terms of Xaar’s Supplier Pack which necessitate compliance with regulatory requirements, including the Act.

Due Diligence and Assessment of Risk

Xaar undertakes due diligence to identify, assess, and mitigate modern slavery risks in its business and supply chains including supplier onboarding due diligence assessments, contractual provisions requiring compliance to the Act and related legislation, and periodical reviews of supplier relationships including re-assessments of compliance. Where concerns are identified regarding a supplier's compliance, Xaar engages with them to implement corrective actions; if, however, a supplier fails to demonstrate adequate commitment to addressing modern slavery risks, Xaar reserves the right to terminate its relationship. Xaar endeavours only to use reputable suppliers in its businesses.

The Board have assigned responsibility to the Audit and Risk Committee for ensuring an effective system of internal control and compliance, including identifying, measuring and managing key risks and risk appetite. The Committee completes regular reviews and monitors risk.

In terms of its own employees, Xaar is committed to offering fair pay to all employees and strives to create a work environment in which bullying, victimisation, harassment and discrimination is eliminated. Xaar provides comprehensive training to employees on a regular basis on compliance matters relating to financial crime, bribery, corruption, money laundering, slavery and whistleblowing. Xaar’s recruitment processes are transparent and it has comprehensive vetting procedures in place for the hiring of new employees.



Commitments for the Year Ahead

We are committed to continuous improvement in our approach to preventing modern slavery. In the financial year ending 31 December 2026, we will:

1. **Enhance Supply Chain Mapping:** Develop more detailed visibility of our supply chain; and
2. **Review and Update Policies:** Conduct a comprehensive review of our policies and processes to ensure, where possible, they reflect best practice and evolving legal requirements.

This document is freely available to customers and stakeholders; this policy is communicated to everyone working for and on behalf of Xaar and is available to the general public.

This statement was approved by the Xaar Board of Directors on 16 March 2026 and signed on its behalf by:

A handwritten signature in black ink that reads 'John Mills'.

John Mills
Chief Executive Officer
Xaar Plc
18 March 2026