



## Modern Slavery Act Statement 2023

### Our Organization

US-based Somero Enterprises, Inc. (“the Company” or “Somero”) pioneered the Laser Screed® precision concrete levelling machine market in 1986 and has since grown its offering from a single product to over 20 today. In addition to equipment, Somero also sells software products, parts, accessories and provides service and training.

With a customer base spanning over 90 countries, sales and customer support operations in the United States, United Kingdom, Belgium, Australia and India, it is the global leader in laser concrete leveling.

### Our Approach

We strive to maintain the highest standards of integrity, ethics, and social responsibility in how we do business. As part of this, we are committed to ensuring that our company and supply chains are free from any form of slavery, forced labor, child labor, or human trafficking.

Somero machines are designed and assembled in the US, using components primarily sourced domestically. The US is ranked 134th out of 167 countries for prevalence of modern slavery in the Global Slavery Index and so is considered low risk relative to most countries.

While most of Somero’s suppliers are located in the US, its supply chains can be extensive, complex and extend internationally. Considering this and acknowledging that modern slavery risks can, in theory, exist at any level, we have adopted a risk-based approach to our activities. The activities we undertake to support our approach are as follows:

- Maintaining strict policies and procedures when hiring workers, adhering to relevant employment laws, and including a whistleblowing policy.
- Including ethical behavior provisions in our policies to foster a culture of awareness and understanding among our employees.
- Compliance with the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act (UKBA). It is Somero’s policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate.
- Adhering to a robust due diligence process when onboarding new suppliers. Depending on the profile of the supplier this may include site visits and a review of the suppliers’ policies and procedures to ensure that they meet the high standards of compliance we expect.
- Engaging in ongoing dialogue with suppliers to ensure they understand and comply with applicable laws and regulations.



- Regularly undertaking audits, risk assessments, and periodic reviews of our policies and procedures.
- Maintaining a framework for the thorough investigation of any allegations or suspicions of unethical or inappropriate behavior or actions.

To further fortify the support for our approach, in 2024 we plan to undertake the following additional activities:

- Ensure consideration of modern slavery risks and prevention are included in our policy review process as an employer and procurer of services.
- Provide relevant training to staff and informing them of the appropriate action to take if they suspect a case of modern slavery or human trafficking.
- Ensure our procurement strategies and contract terms and conditions include references to modern slavery and human trafficking.
- Ensure staff involved in buying/procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.

### **Conclusion**

We are committed to combatting modern slavery. We will continue to review and improve our practices, systems, and policies to ensure that we fulfill our responsibilities under the Modern Slavery Act. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and reflects our actions and intentions in the fight against modern slavery.

Approved by the Board of Directors of Somero Enterprises Inc. on 17 April 2024.

Vincenzo LiCausi  
Chief Financial Officer