



DH OpCo UK Limited

Modern Slavery Statement

for the financial year ending

31 December 2024

Introduction

We, as Dedalus Group (hereinafter also “**Dedalus**”), are committed to minimising the risk of slavery and human trafficking in our business and supply chain. Dedalus forbids any form of slavery, human trafficking, forced labour and child labour, and we are committed to complying with applicable laws prohibiting such exploitation.

DH OpCo UK Limited, part of the Dedalus Group of companies, is making this statement — as required by section 54 of the UK Modern Slavery Act 2015 — of the actions that Dedalus and DH OpCo UK Limited (hereinafter also “**Dedalus UK**”) have taken during our financial year ended 31 December 2024, to ensure that modern slavery and human trafficking are not taking place in our supply chain or in any part of our business.

About Dedalus

Business

Dedalus is a Global Health Software Company and one of the largest in the world, supporting over 6,700 healthcare organisations and 5,700 laboratories and diagnostic centres worldwide, processing its solutions for a population of more than 540 million worldwide. Dedalus supports the whole continuum of care, offering open standards based solutions serving each actor of the Healthcare Ecosystem to provide better care in a healthier planet.

Structure

With a presence in over 30 countries, we have a market leading position in Hospital IT (HCIS) and Diagnostic (DIS) solutions in the United Kingdom, Ireland, Germany, Italy and France. We have a strong market presence in Austria, Switzerland, Spain, Brazil, Australia, New Zealand as well as Latin America, the Middle East and Africa.

At the time of writing Dedalus Group employs more than 7,700 highly skilled and qualified people; it has the largest software R&D team in the industry in Europe, that is, a team of 2,800 of the overall workforce.

Our supply chains

As a technology group, we purchase software, hardware, services and labour, working collaboratively with our ecosystem partners and wider supply chain to secure the sustainable success of our customers by providing innovative solutions.

Dedalus activities and industries are largely considered low risk for modern slavery. Dedalus does not manufacture any hardware, and our core activities often require specialist skills. Our

workforce is highly skilled, and English is the common language across the business. Our core activities and the industries in which Dedalus operates keep our risk profile low for modern slavery and labour violations.

Policies and procedures

We have an appropriate internal control system in place that underpins our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our relevant policies and documentation.

Our internal control system reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The Dedalus Group Code of Ethics¹ sets out the values, corporate culture and the rules of business conduct that employees around the world must comply with. It sets out how, as an international group, we operate with respect for human dignity and human rights, through our operations and in the products and services we offer, requiring the same from our business partners and suppliers. It states our commitments to:

- strive every day to require that slavery, child labour, prison or forced labour, punitive labour, public punishment and human trafficking are never permitted in our operations; and
- prohibit relationships with suppliers that do not comply with the Modern Slavery Act 2015 or similar.

Dedalus UK has adopted the Group Code of Ethics clarifying our commitments to prohibit child labour and the use of forced labour and to ensure our operations are not used to support human trafficking.

Moreover, Dedalus S.p.A., the group parent company, has adopted an Organizational Models according to Italian Legislative Decree no. 231/2001 (hereinafter also “**Decree 231**”), with the aim to set an adequate organizational structure to prevent the corporate crimes listed in Decree 231 including slavery, child abuse, human trafficking and exploitation of labour.

Finally, in order to ensure effectiveness to our internal control system preventing also modern slavery, Dedalus has adopted the Group Whistleblowing Policy. Our intention with the reporting system is to create an environment in which any person (employee, supplier, customer, etc.) feels comfortable reporting illegal behaviour or behaviour contrary to the principles of Dedalus, including physical, verbal, digital harassment or abuse at the workplace or to potential violations of rules, policies and corporate procedures.

In 2025, the Group is also adopting the Business Partners Code of Conduct setting the Dedalus commitment to work only with partners compliant with the fundamental principles of respect for

¹ <https://www.dedalus.com/global/en/esg/code-of-ethics/>

human dignity and planet. The acceptance of the aforementioned Code of Conduct will be included in the Group contractual standards through a dedicated clause.

Due diligence processes for slavery and human trafficking

The types of services that Dedalus procures — for example, software activities — are largely skilled, requiring high levels of education and specialist knowledge as well as English language skills. These are considered low risk for modern slavery. We have a high level of assurance that there is little risk of modern slavery among Dedalus's suppliers.

In our procurement activities we aim to adopt qualification, selection and monitoring processes based on objective and documentable criteria and in compliance with internal procedures, reference legislation and the principles of fairness, cost-effectiveness and quality. In 2025 Dedalus is implementing additional questions focused on slavery and human trafficking to its new supplier qualification questionnaire.

Supplier adherence to our values and ethics

With our suppliers of goods and services we share the values and principles in which we believe, to ensure that our relationships are managed in an ethical and responsible way.

We make our values and ethics commitments in the Dedalus Code of Ethics public via our websites and, starting from 2025, the Dedalus Business Partners Code of Conduct. We expect our suppliers to adopt the same commitments.

The Dedalus Group General Conditions of Supply require suppliers to comply with the Group Code of Ethics and, starting from 2025, the Business Partners Code of Conduct. The Dedalus UK General Conditions of Supply include an obligation on suppliers to take all reasonable steps to ensure that their business and supply chains are free from modern slavery and human trafficking.

Training

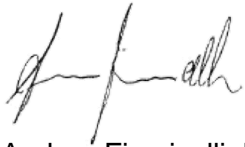
We provide regular training to our staff in ethics and compliance matters, including the content of our Group Code of Ethics. From 2025 Dedalus procurement staff are being given modern slavery training including how to identify cases of modern slavery in the global supply chain.

Our effectiveness in combating slavery and human trafficking

At Group level compliance is overseen by our Chief Risk & Compliance Officer. In the UK Dedalus UK has formed a Risk and Compliance Committee that meets monthly to review business risk and compliance matters and act as a point of escalation for issues that would include modern slavery concerns. No risks or concerns related to modern slavery or human trafficking were raised in the year ending 31 December 2024, including through our whistleblowing channel.

Board of directors approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes DH Opco UK Limited's slavery and human trafficking statement for the financial year ending 31 December 2024. It was approved by the board of directors of DH Opco UK Limited on 12th June 2025.

A handwritten signature in black ink, appearing to read 'A. Fiumicelli', written in a cursive style.

Andrea Fiumicelli, Director, Chairman of Dedalus Group

DH OpCo UK Limited

Date: 12th June 2025