



**MEHLER  
SYSTEMS**

**MEHLER VARIO SYSTEM GMBH  
MODERN SLAVERY  
AND  
HUMAN TRAFFICKING  
STATEMENT**

May 2026



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### 1. Introduction

Mehler Vario System GmbH (“MVS”) has an established commercial presence in the United Kingdom and, for many years, has supplied products to public sector authorities there. On this basis, MVS considers that it carries on business in the UK and therefore publishes this statement in accordance with section 54 of the UK Modern Slavery Act 2015.

This Statement describes the actions taken by MVS and its subsidiaries Mehler Engineered Defence GmbH, Lindnerhof-Taktik GmbH, UNI&FORMA d.o.o. and Mehler Protection Italia srl. (hereinafter referred to as “the Mehler Systems Group, we or our”) during the financial year 2025 (ended 31.12.2025) to prevent modern slavery and human trafficking in our business and supply chains.

All of the Mehler Systems Group entities operate under unified governance, compliance and due diligence frameworks with respect to human rights, supply chain responsibility and business conduct; considering entity-specific operational characteristics where relevant. Each Managing Director of the respective Group entity is responsible for managing any modern slavery risks within its operations, with overall accountability held by the Board of MVS.

In addition, we implemented in 2024 a group-wide human rights and environmental due diligence system aligned with the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – “LkSG”) and we leverage this framework to strengthen the prevention of forced labour and human trafficking across our operations and supply chain.

We recognise that modern slavery can take many forms, including slavery, servitude, forced or compulsory labour and human trafficking. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to help ensure modern slavery is not taking place anywhere in our own business or supply chains.

### 2. Our Business and Operations

MVS is headquartered in Germany (Edelzeller Straße 51, 36043 Fulda). The Mehler Systems Group’s product portfolio is structured into four main categories:

- **Body Armour:** This includes hard-and soft ballistic protection, knife and stab protection as well as riot gear.
- **Platform Armour:** This includes armour systems integrated into vehicles, vessels, aircraft, or fixed platforms to protect against ballistic threats.
- **Carrying systems:** These include tactical belts, modular pouches, carrying straps, webbing, plate carriers and various types of protective vests.
- **Tactical clothing:** The range includes tactical jackets, trousers, combat trousers and combat shirts.

We act as a global supplier to law enforcement agencies, the military and special forces and operate in over 40 countries.

We maintain production facilities in Europe (Germany: ballistic fabric manufacturing; Slovenia and Serbia: textile manufacturing), and – for textile components only – we also work with various contract sewing partners in Europe and Asia.



### **3. Governance**

We maintain a Group-wide Code of Conduct for employees, which includes i.a. commitments on human rights and working conditions, including a strict ban on child labour, forced labour and modern slavery, expectations for fair pay, reasonable working hours and respect for minimum employee rights. The Code of Conduct also encourages reporting of suspected violations and provides access to a whistleblowing channel.

We also maintain a Code of Conduct for Business Partners that sets out our expectations regarding correct business behaviour, compliance with human rights and protection of the environment. In particular, it prohibits child labour as well as forced labour, slavery and human trafficking. It also sets expectations regarding fair working conditions, fair remuneration, working hours and freedom of association, and requires business partners to promote and enforce these expectations in their own supply chains.

We have established the role of an In-House Legal Counsel and Human Rights Officer and have also defined responsibilities within MVS's Procurement and Human Resources departments to ensure compliance with human rights and other obligations relating to ethical business conduct, including within the supply chain. The Human Rights Officer is supported by a deputy in HR. The Human Rights Officer and deputy report regularly (typically at least annually) to the Managing Directors on the status and findings of the risk management and due diligence system, and ad hoc where urgent risk notifications arise.

### **4. Assessment of Modern Slavery Risk in our Supply Chain**

We apply a risk-based approach. In line with our LkSG-aligned due diligence system, the risk analysis covers (i) our own business operations (own sites and activities) and (ii) our direct suppliers; and it is designed to be updated on a regular basis and upon material changes in the respective risk profiles. The approach includes an analysis of country risk based on publicly available indices and sources, combined with activity risks (for our own operations) and product/commodity group risks (for suppliers); including supplier questionnaires.

In 2024 we started with a risk analysis for our own business operations and continued such analysis in 2025 for direct suppliers; prioritizing such suppliers identified as higher risk based on country and product group risk. The process of collecting and analysing direct supplier responses was initiated and continued during the 2025 business year. With regard to indirect (tier-n) suppliers, we did not have substantiated knowledge of potential due diligence violations during the reporting period. Therefore, no separate risk analysis was conducted for this supplier group. If relevant indications are received, we will react in a timely manner and initiate appropriate clarification and, where necessary, remedial measures.

For selected direct suppliers, mainly contract sewing partners, we also require evidence of certifications such as Worldwide Responsible Accredited Production (WRAP) to support compliance with internationally recognised social standards. These expectations have been anchored in cooperation agreements since 2015 and are integrated into the selection process for such partners.

We also integrate human rights requirements into contractual baseline documents through the Business Partner Code of Conduct. New and existing suppliers are required to commit to compliance with the Business Partner Code of Conduct as part of supplier qualification, and supplier evaluation forms part of our Supply Chain Risk Management process.

Risk analyses and due diligence activities described herein are conducted on a group-wide basis, covering Mehler Vario System GmbH and its consolidated subsidiaries, and differentiate between the own business activities of the entities and their respective direct suppliers.

### **5. Reporting Concerns / Grievance Mechanism**

We operate an accessible grievance mechanism that is available to internal and external stakeholders, including for notifications concerning human rights and environmental risks and violations in our own business and along our supply chain. Reports can be submitted anonymously via an electronic whistleblowing system provided by LegalTegrity. The system is publicly accessible via a link on our website; technical processing is handled via external servers in Germany.



Reports made via the whistleblowing system are received by the In-House Legal Counsel and Human Rights Officer, with deputy coverage in HR, who assesses whether the report concerns modern slavery/forced labour, other human rights or environmental risks, or other compliance matters and coordinate follow-up with the relevant functions (e.g., Procurement, HR). Internal rules ensure protection against retaliation for good-faith reports; knowingly false accusations are excluded from protection. A publicly available procedure regulation describes accessibility, responsibilities and process, in line with applicable whistleblowing and due diligence requirements.

#### **6. Remediation and Corrective Actions**

If concrete indications of human rights breaches become known, a structured remediation process applies. Under the involvement of the In-House Legal Counsel and Human Rights Officer and relevant departments, internal investigation and consultation with affected parties or their representatives may be initiated. Depending on the case and leverage, measures may include engagement with the supplier, agreed corrective action plans with deadlines, and verification of implementation. Corrective measures can be implemented up to, and including, termination of the business relationship in case of persistent breaches.

In the reporting period no material violations of human rights, labour or working standards were identified or reported, and all reported matters were handled and closed in line with state-of-the-art compliance practices.

#### **7. Training and Awareness**

As part of the roll-out of our due diligence framework, employees were informed in writing about the Code of Conduct, suppliers were informed about the Code of Conduct for Business Partners, and both groups were informed about the whistleblowing system and the associated internal procedures.

In addition, this year we have launched an internal training platform, which we are already using for training on various compliance topics, and which we will also use in future for regular and role-specific modern slavery / forced labour training.

#### **8. Effectiveness and Continuous Improvement**

We are committed to continuous improvement of our systems and controls. The whistleblowing procedure is intended to be reviewed for effectiveness at least annually and on an ad hoc basis. Improvements may be implemented in response to changes in risk profiles, regulatory requirements, complaints, violations and audit findings.

We will continue to develop our risk management and due diligence processes, including with a view to broader supply chain transparency and evolving regulatory expectations.

#### **9. Approval**

This statement has been approved by the Managing Directors of Mehler Vario System GmbH acting also on behalf of the subsidiaries included in the consolidated reporting scope of the Mehler Systems Group.

Fulda, 22 May 2026

  
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Dr. Mario Amschlinger  
CEO and Managing Director, Mehler Vario System GmbH

  
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Dr. Max Padberg  
CFO and Managing Director, Mehler Vario System GmbH