



Spitch Zürich – London – Milano – Madrid
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Our Commitment

This statement is made by SPitch AG and group companies (collectively, SPitch) in accordance with s. 54 Modern Slavery Act 2015 (the "Modern Slavery Act") for the fiscal year ending March 31, 2026.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. SPitch has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

At SPitch, we are committed to playing our role by ensuring that through our management and operations we have the systems, policies and processes in place to identify any potential instances of exploitation and, if found, eradicate modern slavery in all its forms from our business and supply chain. We are taking the appropriate steps to ensure that everyone who works for SPitch benefits from a working environment in which their fundamental human rights are respected and anyone that we do business with also upholds these principles.

Our Business and Structure

Spitch AG is a global provider of B2B and B2C Conversational AI solutions, headquartered in Zurich, Switzerland since 2014 with a presence in many countries across Europe and North America. We employ over 60 full-time and part-time employees across several jurisdictions. SPitch UK Limited is a direct subsidiary of SPitch AG.

Spitch helps enterprises to better understand and serve their customers through the use of Natural Language Processing (NLP), Artificial Intelligence (AI) and Machine Learning. Spitch both owns and is constantly developing its core technology. This is taken to market in the form of end-to-end products such as virtual assistants, voice biometrics and speech analytics. We work across a range of sectors, providing the insight, innovative solutions and cutting-edge technologies that give time back, allowing our clients to focus on what they do best and making people's lives easier and simpler.

Modern Slavery Risks

Based on the nature of our business, location of workforce and the services we provide, we consider the risk of modern slavery in our business to be minimal. If a risk of modern slavery, or a potential modern slavery incident, was identified in our business or supply chain, we would investigate that risk or incident in accordance with our Code of Business Conduct (as described below).

SPitch AG internal policies set out the steps that the Company has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain:

- **Recruitment policy.**

We operate a robust recruitment policy, including conducting eligibility check to work in Switzerland (and other Spitch locations) for all employees to safeguard against human trafficking or individuals being forced to work against their will.

- **Code of business conduct** applies to all SPitch subsidiaries and prohibits, among other things, our directors, officers, employees and independent contractors from engaging in any unlawful activity in conducting business or in performing their day-to-day duties. The Code also requires directors, officers, employees, and independent contractors to engage with our partners, suppliers, competitors, and employees fairly and ethically in all business dealings on SPitch's behalf. This includes also acting in compliance with the Modern Slavery Act.

- **Supplier selection code.**

With respect to the conduct of our suppliers (though our supplier chain is very limited), we have methods of due diligence in place and our contracts generally require our suppliers to comply with all applicable laws, including the Modern Slavery Act. We expect all our suppliers' colleagues or contractors to report any breaches through their own grievance mechanism, or directly to SPitch.

Due to specific nature of business, SPitch uses very limited number of suppliers, therefore, risk of supplier' incompliance is very low. But should SPitch become aware of any policy violations or issues related to slavery or human trafficking, we will consult with our legal team to ensure that appropriate measures are taken, which may include reporting this information to authorities and terminating our relationship with a supplier.

- **Employee Training and Code of Conduct.**

In addition to requiring compliance with law under the Code on business conduct, our Employee Code of Conduct and separate Manual also require compliance with all SPitch internal policies and indicate that we are committed to a work environment in which individuals are treated with respect, that we prohibit discriminatory practices and that we are committed to providing a safe and healthy workplace for all employees. New employees are provided with the Employee Manual and link to all the policies and codes upon hire and with updates whenever applicable.

Assessment of KPIs

We are monitoring the effectiveness of the processes and procedures to address the modern slavery risks in line with the UN Guiding Principles. We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance and external assurance processes. Based on the results of these processes we will adapt and strengthen our actions to continually improve our responses to modern slavery. Tackling Modern slavery and human trafficking is a complex challenge. SPitch continues its efforts to combat these practices and develop policies and procedures accordingly.