

Open-Xchange AG

Modern Slavery and Human Trafficking Statement

Financial year ending 31 December 2025

This statement is made on behalf of Open-Xchange AG and its subsidiaries (together, the “Open-Xchange group”) and sets out the steps we have taken during the financial year ending 31 December 2025 to prevent modern slavery and human trafficking in our operations and supply chains. We publish it in accordance with the transparency principles of section 54 of the Modern Slavery Act 2015. Open-Xchange AG is the group holding company and does not itself supply goods or services to customers; this statement covers the group’s operating subsidiaries that carry on business in the United Kingdom, namely Open-Xchange GmbH, which provides our business-to-business email and collaboration software and services to customers in the United Kingdom; PowerDNS.com B.V., which provides our PowerDNS DNS software and services to customers in the United Kingdom; and Everymail GmbH, which operates our direct-to-consumer email service, Everymail. It is intended to satisfy the section 54 obligation of each of these operating entities. We are committed to acting ethically and with integrity in all our business dealings, and to strengthening our approach year on year.

1. Our organisation, business and supply chains

The Open-Xchange group is a provider of open-source email, collaboration and DNS software and services to customers worldwide. Our OX App Suite is a modular platform combining email, calendar, contacts and productivity applications, used by telecommunications operators, internet service providers and enterprises to deliver email and productivity services to millions of end users. The group also develops the Dovecot mail server, that underpins email infrastructure globally, and the PowerDNS range of authoritative, recursive and protective DNS solutions, which help power domain hosting and DNS resolution for millions of internet users.

The group also operates Everymail, a direct-to-consumer subscription email service provided through our subsidiary Everymail GmbH, which offers individual users worldwide a private, ad-free email experience built on the group’s own technology. This is the group’s principal direct relationship with end consumers.

The group employs approximately 230 people across engineering, product, support, consulting, sales and marketing functions in multiple countries. Our workforce is predominantly skilled, salaried and professional, and we make only very limited use of temporary or agency labour. We deliver our software on-premise, in our customers’ own cloud environments, and through our own hosted cloud and data-centre services.

Our supply chain is typical of a software and technology business. It comprises principally cloud infrastructure and data-centre providers; IT hardware and networking equipment; software, SaaS tools and licences; professional and consulting services; customer support and payment processing services; facilities and office services; and marketing, events and travel suppliers.

2. Policies

Our approach to responsible and ethical business conduct is set out in our group-wide OX Code of Conduct, which establishes the standards of integrity we expect of everyone working for and with Open-Xchange, and which also sets out the standards we expect of our suppliers. This is supported by our Anti-Bribery and Corruption Policy and our Whistleblowing Policy, together with a confidential whistleblowing tool through which employees and third parties can raise concerns — including any relating to human rights, labour practices or modern slavery — without fear of retaliation.

3. Risk assessment and management

We consider modern slavery risk as part of our overall business and compliance risk management. As a business that delivers software and online services largely through a professional, salaried workforce, and given our very limited use of temporary or agency labour, we assess the risk within our own operations as low. The more material risks in our sector sit in the supply chain — particularly the manufacture of IT, networking

and data-centre hardware, and outsourced services such as customer support, cleaning, security and catering. We take these factors into account when engaging and reviewing suppliers and partners.

4. Due diligence and remediation

Modern slavery due diligence forms part of our broader supplier and partner onboarding and risk-management processes. Depending on the nature and scope of each engagement, our checks include know-your-customer and know-your-supplier verification, sanctions screening, and data protection and information security due diligence. Our Code of Conduct and contractual arrangements set expectations for lawful and ethical conduct by those we work with, including in relation to labour standards. Where concerns are raised — including through our whistleblowing channel — they are investigated by the Business Integrity Team or our OX Ethics and Compliance Committee and the Compliance Officer, and appropriate action is taken. We operate a zero-tolerance approach to modern slavery. Where a concern is substantiated in our supply chain, our first step is to work with the supplier on a corrective action plan and, where relevant, on appropriate remediation for anyone affected; if a supplier is unwilling or unable to address the concern within a reasonable period, we will end the relationship. During the financial year ending 31 December 2025 we did not identify, and were not made aware of, any instances of modern slavery or human trafficking in our operations or supply chains.

5. Training

While we do not currently provide modern-slavery-specific training to all employees, due to the nature of our core business and the aforementioned safeguards with little to no risk of non-compliance, awareness of the relevant standards is embedded in employee onboarding and reinforced through our Code of Conduct, related policies and guidelines, and the terms of employment. Additionally, we have dedicated functions within our group that take extensive effort in ensuring compliance with applicable law, regulation, standards and overall good citizenship, like our HR department, the Business Integrity team, our OX Ethics and Compliance Committee, as well as our Compliance Officer. All employees are made aware of our whistleblowing channel and how to raise concerns.

6. Monitoring effectiveness

We monitor the effectiveness of our approach through indicators including:

- concerns reported through our whistleblowing channel, and how they are resolved;
- regular impact assessment of the supplier relationships;
- compliance with all applicable labour law regulations for legislations in which we are employing personnel; and
- the coverage of know-your-customer, know-your-supplier and sanctions screening across relevant suppliers and partners.

As our approach matures, we intend to develop more specific modern slavery measures.

Progress since our previous statement

This modern slavery statement builds on and replaces the statement previously made by Open-Xchange GmbH for the financial year ending 31 December 2024, broadening our reporting from a single company to the wider Open-Xchange group.

Compared with our previous statement, we have taken a number of steps forward during the year. We expanded the scope to cover the group's UK-facing operating entities; provided a fuller description of our business, brands and supply-chain categories; added our Anti-Bribery and Corruption Policy alongside our Code of Conduct and whistleblowing arrangements; introduced a dedicated supply-chain risk assessment; broadened our supplier due diligence to include know-your-customer, know-your-supplier and sanctions screening; set out for the first time how we monitor the effectiveness of our approach; and articulated our

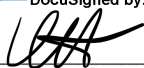
zero-tolerance and remediation approach. We recognise that formalised, role-based training for higher-exposure functions and quantitative effectiveness metrics are areas we intend to develop further.

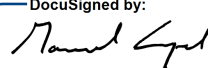
Looking ahead

As with all of our compliance efforts, we are committed to improving our approach over time. Building on our existing Code of Conduct — which also applies to our suppliers — we will keep our policies, due diligence and reporting under review, and develop more specific modern slavery measures as our programme matures. We intend to continue publishing this statement each year, whether or not we are required to do so.

Approval

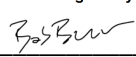
This statement was approved by the Managing Board of Open-Xchange AG on **10 June 2026**, on behalf of the Open-Xchange group — comprising Open-Xchange AG, Open-Xchange GmbH, PowerDNS.com B.V. and Everymail GmbH — and constitutes the group's modern slavery and human trafficking statement for the financial year ending 31 December 2025. Accountability for this area sits with our Business Integrity Team and Compliance Officer, with oversight from the Managing Board and the General Managers of the group entities.

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