

MODERN SLAVERY STATEMENT

1. INTRODUCTION

Modern slavery, forced labour, and human trafficking are grave violations of fundamental human rights. Astrère is committed to acting ethically and with integrity in all its business dealings and relationships, and to ensuring that such activities are not taking place anywhere in its own operations or supply chain.

This statement is published voluntarily by Astrère in line with best practices under the UK Modern Slavery Act 2015 and the principles of the French devoir de vigilance (loi n° 2017-399 du 27 mars 2017). It sets out the steps Astrère has taken during [year] to identify and address the risk of modern slavery in its business and supply chain.

2. ORGANISATION'S STRUCTURE AND BUSINESS

Astrère is a société par actions simplifiée incorporated under French law, with registered office at [address], France. Astrère develops and operates NOVA Ox1 (the "Service"), a proprietary B2B sourcing platform provided as a software-as-a-service (SaaS) solution to corporations and governments.

Astrère is a single legal entity with no subsidiaries, branches, or affiliated companies. Astrère currently operates exclusively based out of France and within the European Union.

Astrère's business consists of:

- Development, operation, and maintenance of the Service;
- Provision of professional services (implementation, configuration, training, and consulting); and
- Management of a curated network of technology product and service providers (Suppliers) who participate in the Service pool.

3. OUR SUPPLY CHAIN

As a pure SaaS company with no manufacturing, physical distribution, or logistics operations, Astrère's supply chain is limited and low-risk. Astrère's material direct suppliers are:

Supplier	Role	Location
OVH SAS ("OVH EU")	Primary hosting infrastructure and Client/Supplier Data storage	France / EU
Mistral AI SAS ("Mistral AI EU")	AI-assisted functionality integrated within the Service	France / EU
Anthropic PBC (opt-in)	AI capabilities within the Service	USA

OVH EU (hosting Subprocessor) and Mistral AI EU are large, established French companies operating within the European Union under French and EU labour law. Anthropic is only engaged in the "Hybrid" Service offering and not in the EU sovereign Service offering. Astrère also engages individual contractors on a project basis as needed; these contractors are engaged through arms-length commercial arrangements and are predominantly located in the EU.

4. RISK ASSESSMENT

Astrère has assessed the risk of modern slavery in its own operations and supply chain as low, for the following reasons:

- Astrère has no employees engaged in manual labour, manufacturing, or logistics. Astrère's sole executive director and any contractors are engaged as skilled knowledge workers.
- Astrère's material supply chain consists exclusively of two large French SAS companies operating under French and EU labour law, including the Code du travail, which provides robust worker protections.
- Astrère does not source goods from high-risk jurisdictions for modern slavery or forced labour as identified by applicable international risk frameworks.
- Astrère operates exclusively in France and the EU, which are subject to strong legal frameworks prohibiting forced labour, trafficking, and exploitation.

Notwithstanding the low assessed risk, Astrère is committed to ongoing vigilance and will review its risk assessment annually and upon any material change to its supply chain.

5. OUR POLICIES

Astrère has adopted the following policies and commitments relevant to modern slavery:

- Code of Business Conduct and Ethics (CoBC): Astrère's CoBC expressly prohibits forced labour, child labour, and modern slavery in Astrère's own operations and value chain. The CoBC is publicly available at <https://www.astrere.com/legal>.
- Employment Practices Policy: Astrère's CoBC includes an Employment Practices section setting out Astrère's commitments to lawful, fair, and respectful employment in accordance with French and EU labour law, including compliance with minimum wage (SMIC), working time rules, and employee rights.
- Supply Chain Standards: Astrère's CoBC sets out the standards expected of all suppliers, vendors, and partners, including compliance with applicable human rights and labour laws.
- Whistleblowing: Astrère's CoBC provides a mechanism for reporting concerns, accessible to employees, contractors, suppliers, and clients, including anonymously, via legal@astrere.com.

6. DUE DILIGENCE PROCESSES

Astrère takes the following steps to identify and address modern slavery risks:

- Supplier onboarding: Prior to engaging any material supplier, Astrère reviews the supplier's legal status, financial position, and compliance profile, including with respect to applicable labour and human rights standards.
- Contractual requirements: All material suppliers are contractually required to comply with the principles of Astrère's CoBC, including its human rights and labour standards.
- Annual review: Astrère conducts an annual review of its material suppliers' compliance posture.
- CS3D due diligence questionnaire: Astrère uses a structured CS3D-aligned due diligence questionnaire (DDQ) to assess ESG and human rights compliance in its supply chain, aligned with the requirements of Directive 2024/1760/EU (CS3D) and the French devoir de vigilance.

7. TRAINING AND AWARENESS

Astrère's Code of Business Conduct and Ethics, including its human rights and modern slavery commitments, is made available to all persons working for or with Astrère. Upon hiring its first employee, Astrère will implement a formal onboarding and compliance training programme covering modern slavery awareness, in accordance with its Compliance Action Plan.

8. NEXT STEPS

Astrère will continue to develop and strengthen its approach to modern slavery and human trafficking risk, including:

- Conducting a formal supply chain human rights risk assessment (targeted Q4 2026);
- Implementing a dedicated value chain grievance mechanism (targeted Q4 2026);
- Implementing a formal onboarding and compliance training programme for all new hires (targeted Q1 2027);
- Publishing a voluntary due diligence statement aligned with CS3D principles (targeted Q2 2027).

9. APPROVAL

This statement has been reviewed and approved by the CEO of Astrère.

Vanessa de Lima

Chief Executive Officer
15-October-2026