



Voluntary Modern Slavery and Human Trafficking Statement

1. Introduction

This voluntary statement is made on behalf of Emarsys UK Limited pursuant to section 54 of the Modern Slavery Act 2015 (the Act) and sets out the steps the company has taken, and is continuing to take, to assess and address the risk of modern slavery and human trafficking in its business and supply chains.

Although Emarsys UK Limited is not currently required to publish a statement under section 54 of the Act, the company has chosen to do so voluntarily to demonstrate its commitment to acting ethically and responsibly and to ensuring that modern slavery and human trafficking do not take place in its operations or supply chains.

Unless otherwise stated, references in this statement to “**Emarsys**”, “**we**”, “**us**”, and “**our**” are to Emarsys UK Limited.

2. Business Structure and Organisation

Emarsys UK Limited is a private limited company incorporated in England and Wales and is a subsidiary of Emarsys eMarketing Systems GmbH, an Austrian company, which in turn is wholly owned by SAP SE, a company headquartered in Germany (“**SAP**”). Emarsys provides a cloud-based customer engagement and marketing automation platform.

3. Our Approach to Modern Slavery and Human Rights

Emarsys is committed to respecting human rights and opposing all forms of modern slavery and human trafficking. We seek to conduct our business in a manner consistent with applicable labour and employment laws and with recognised ethical standards.

Emarsys recognises and supports internationally recognised human rights standards. We operate within the wider SAP group that is guided by the principles set out in key international instruments concerning human rights and labour standards, including those developed by the International Labour Organisation.

Emarsys is committed to respecting fundamental rights at work. Standards set out expectations for lawful, ethical, and responsible employment practices, including compliance with applicable labour laws and respect for internationally recognised human rights principles. Forced labour, bonded labour, involuntary prison labour, and human trafficking are not tolerated.

Employment is based on free choice, and workers are not required to pay recruitment fees, lodge deposits, or surrender identity documents as a condition of employment. Individuals are free to leave their employment in accordance with applicable notice requirements and contractual arrangements.

While Emarsys operates primarily in a professional services and technology environment and does not engage in manufacturing activities, we recognise that modern slavery risks can arise in any sector and are committed to taking proportionate steps to identify and mitigate such risks.

4. Policies and Governance

Emarsys, as part of the SAP group, is working towards implementing and maintaining policies and procedures designed to minimise the risk of modern slavery and human trafficking within its business and supply chains. These measures are kept under review and are intended to align with group-level standards and values where appropriate.



5. Due Diligence Processes

To help identify and manage risks of modern slavery and human trafficking in its supply chains, Emarsys, as part of the SAP group, undertakes proportionate due diligence measures.

Emarsys also seeks to engage only reputable employment agencies and expects such agencies to adhere to applicable legal and ethical standards.

6. Risk Identification and Assessment

Emarsys recognises that the risk of modern slavery and human trafficking varies depending on the nature of business activities and supply chain relationships. Given that the company operates primarily in a technology and professional services environment, it does not consider its own operations to present a high risk of modern slavery.

Notwithstanding this, Emarsys acknowledges that certain areas of its supply chain may present an elevated risk, particularly where services are provided by third parties, including labour providers, recruitment agencies, facilities management services, and other outsourced support functions.

These potential risk areas are considered as part of Emarsys' supplier due diligence processes and inform the level of scrutiny applied to relevant suppliers. Emarsys adopts a proportionate approach to identifying and addressing modern slavery risks, taking into account the size, nature, and complexity of its business and supply chains, and continues to review its approach as the business evolves.

7. Training and Awareness

Emarsys is committed to raising awareness among its employees of the risks of modern slavery and human trafficking. Employees must complete a mandatory compliance training program.



This statement was approved by Managing Director of Emarsys UK Limited.

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Signed for and on behalf of Emarsys UK Limited:
Daniel Hagos
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Daniel Hagos
Managing Director

Date: 02/17/2026 | 15:29 PST