

Human Rights Compliance

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UK Modern Slavery Act Statement (Financial Year 2025)

Preamble

The Section 54 of the United Kingdom Modern Slavery Act 2015 (“**UK Modern Slavery Act**”) requires certain globally operating corporations to disclose their efforts to address Modern Slavery & Human Trafficking in their supply chains.

This statement is made in respect of the supply chains of **Allplan GmbH**, **Bluebeam Inc.**, **Graphisoft SE**, **Maxon Computer GmbH** and **Vectorworks Inc.** The statement sets out the steps taken during 2025 to prevent Modern Slavery & Human Trafficking in the business and supply chains.

This statement intends to provide transparency for stakeholders regarding Nemetschek Group’s value chain and respective business partners.

Managing our Group well and taking responsibility for employees, society and the environment is of great importance to us. With our group solutions, which improve resource efficiency in the construction industry and enable the most careful use of resources, we make an important contribution to climate and environmental protection.

We pursue a preventive compliance approach and foster a corporate culture in which all employees are made aware of the issue and receive appropriate training.

Visit our website to learn more about the Nemetschek Group:
www.nemetschek.com/en

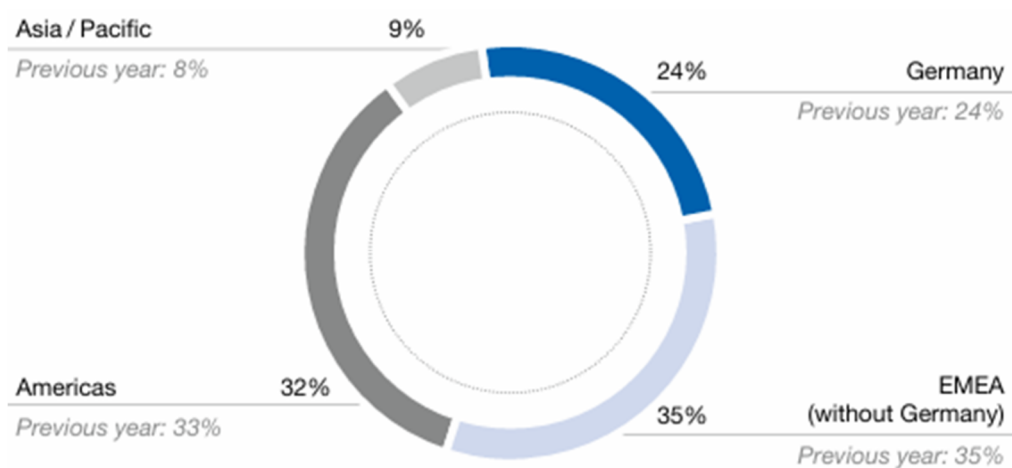
Our History

The company’s history dates back more than 60 years to its foundation in 1963 by Prof. Georg Nemetschek. Today, the Nemetschek Group is a global provider of software solutions in the AEC/O industry (Architecture, Engineering, Construction, and Operation) as well as in the Media segment.

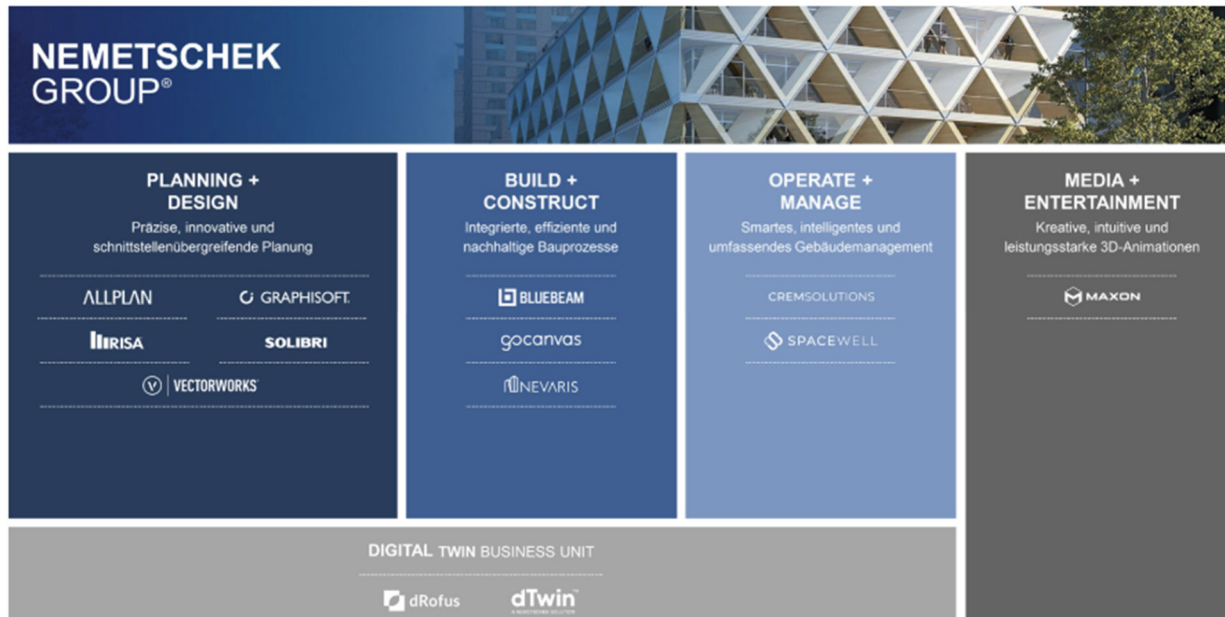
Our Structure

The Nemetschek Group is organized as a strategic holding company (Nemetschek SE – publicly listed on the German Stock Exchange) with numerous globally operating subsidiaries (brands).

The Nemetschek Group employs today more than 4,000 experts worldwide. The chart below shows the distribution of employees by region:



The Nemetschek Group total of 12 specific brands are divided among the four segments of Design, Build, Manage and Media and the Business Unit Digital Twin according to their respective focus on specific end markets and customer groups.

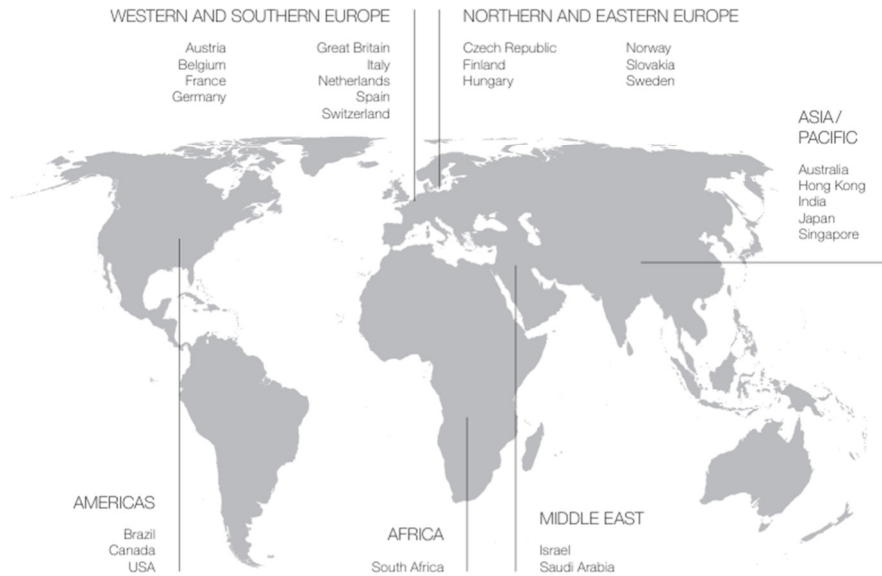


The segments are responsible for implementing the Nemetschek Group’s operating activities in accordance with the objectives, strategic and legal framework specified by the Group holding company.

Our Locations

The holding company Nemetschek SE is headquartered in Munich, Germany. The Nemetschek Group brands develop and market their solutions worldwide from a total of 83 locations.

NEMETSCHKEK LOCATIONS GLOBALLY



Visit our website to learn more about the Nemetschek Group:
www.nemetschek.com/en

Our Business

The Nemetschek Group offers digital solutions for all disciplines across the entire lifecycle of buildings and infrastructure projects, as well as for all phases in the creation of 2D and 3D digital content in the Media segment. In the AEC/O segment, the aim of offering networked solutions is to further improve cooperation between the various professional groups in the construction industry and to make this cooperation more efficient. Our broad portfolio comprising graphical, analytical and commercial solutions therefore enables an end-to-end workflow in the lifecycle of construction and infrastructure projects.

Here, the Nemetschek Group's software solutions meet the requirements of the central working method within the planning, construction and administrative process for buildings known as Building Information Modeling (BIM). BIM, an integral part of the digitalization of the construction industry, is used to digitally record and connect all design, quality, timing, and business requirements and data.

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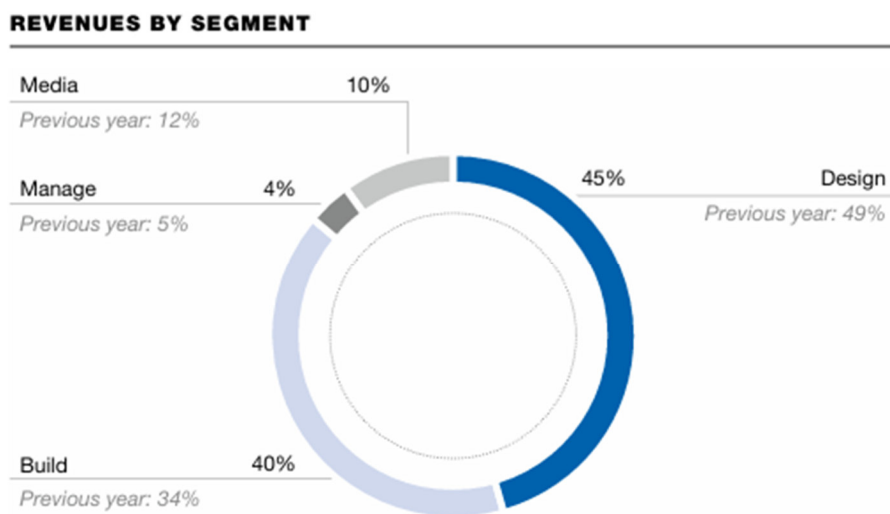
The Nemetschek Group has been following this integrated BIM approach for more than 30 years. Building Information Modeling enables efficient, sustainable, and transparent collaboration, improving the workflow for all those involved throughout the entire planning and building process and subsequent use phase of a property or infrastructure project.

Ultimately, these insights can help architects, engineers and building managers design and operate efficient and sustainable buildings.

In view of sustainability, the Nemetschek Group's software solutions also contribute to more resource-efficient planning and construction and subsequently more efficient operation across the entire lifecycle of buildings and infrastructure projects. Detailed documentation also enables efficient operation across the entire lifecycle – for example, a structure can thus be efficiently rebuilt and renovated years after completion.

At the same time, the Nemetschek Group with its Media segment is also a provider in the field of 3D animation solutions. The Nemetschek Group thus supports artists in optimizing their creative workflows, e.g., through 3D modeling, simulation and animation, tools for editing, motion design, and film production as well as rendering solutions for high-end productions. Our professional solutions for producing 2D and 3D digital content are used to create and render visual effects in feature films, TV shows and commercials, as well as for applications in the gaming industry and for applications in the areas of medical illustration, architecture and industrial design.

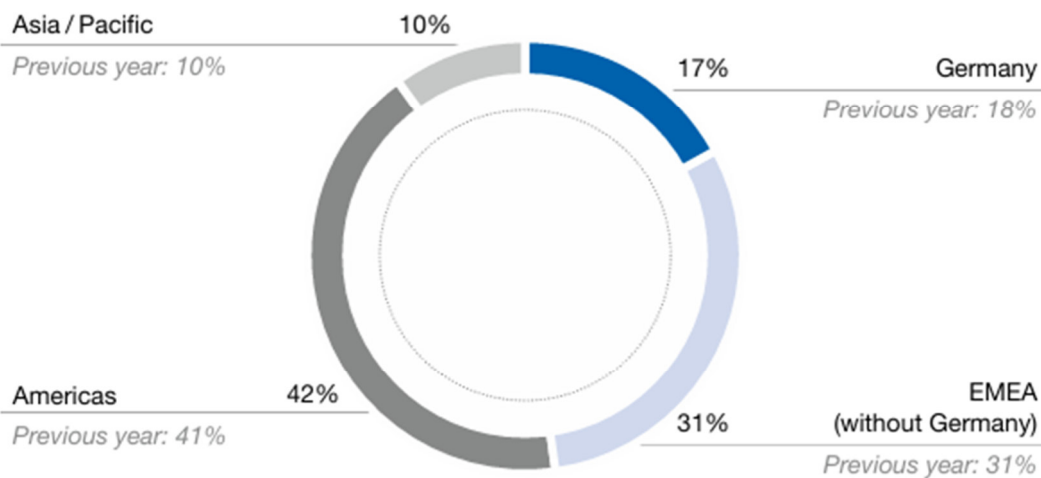
Revenues by Segment are as follows:



A strategic goal of the Nemetschek Group is the further internationalization of the business alongside the development of markets with a high growth potential. However, this market development should always be carried out responsibly, sustainably and in accordance with all regulations and laws.

Revenues by Region are as follows:

REVENUES BY REGION IN %



Visit our website to learn more about the Nemetschek Group:
www.nemetschek.com/en

Compliance & Sustainability

Code of Conduct (CoC) – Basis of our Business

Nemetschek Group's business activities are based on the legal framework and ethical standards of the different countries in which it operates.

Compliance, fair business practices and the prevention of discrimination are of utmost relevance for us.

Actual or suspected violations of applicable laws, internal regulations or ethical standards could have negative financial consequences. They could also have a negative impact on the reputation of the Nemetschek Group.

To promote trusting and long-term business relationships, the Nemetschek Group focuses on the transparent and lawful processing of all transactions. In addition, employees are expected to treat each other and third parties fairly and respectfully.

To this end, we have summarized the most important principles and regulations (also covering human rights topics) in our group-wide **Code of Conduct (CoC)** and made it available on our Nemetschek Group's website in German and English.

The CoC is the key document addressing individual responsibility within the Nemetschek Group. It is binding for all employees – regardless of their position – and this has been announced throughout the company to reach clear guidance and more sustainable transparency.

Supplier Code of Conduct (SCoC)

The Nemetschek Group will ensure a high level of understanding of the risks of Modern Slavery & Human Trafficking with its own business and its supply chains by providing training to the relevant members of staff as well as briefing all Directors on the subject.

To live up to our holistic responsibility, we have created a Nemetschek Group's **Supplier Code of Conduct (SCoC)** and made it available on the company website in German and English. We include this document as an integral risk-based part of any important supplier contract. Furthermore, we expect our suppliers and business partners to accept and live our values in daily business.

The Nemetschek Group will not knowingly support and/or do business with any suppliers who are involved in Modern Slavery and/or Human Trafficking. In case of any Non-Compliance the Nemetschek Group reserves the right to take appropriate measures, including the termination of business relationships.

Both, the CoC and the SCoC provide guidelines that include the fundamental principles of the International Labour Organization (ILO), among other things.

Visit our website to learn more about our CoC & SCoC:
<https://www.nemetschek.com/en/own-workforce>

Sustainability at the Nemetschek Group

The Nemetschek Group places considerable importance on good corporate governance and social and environmental responsibility.

The Nemetschek Group focuses on acting sustainably not only in the development of our software solutions, but also in relation to how we treat our employees, business partners and customers and approach our role in society. For this reason, as mentioned above, the Nemetschek Group has defined standards in its CoC & SCoC for the way in which it conducts day-to-day business.

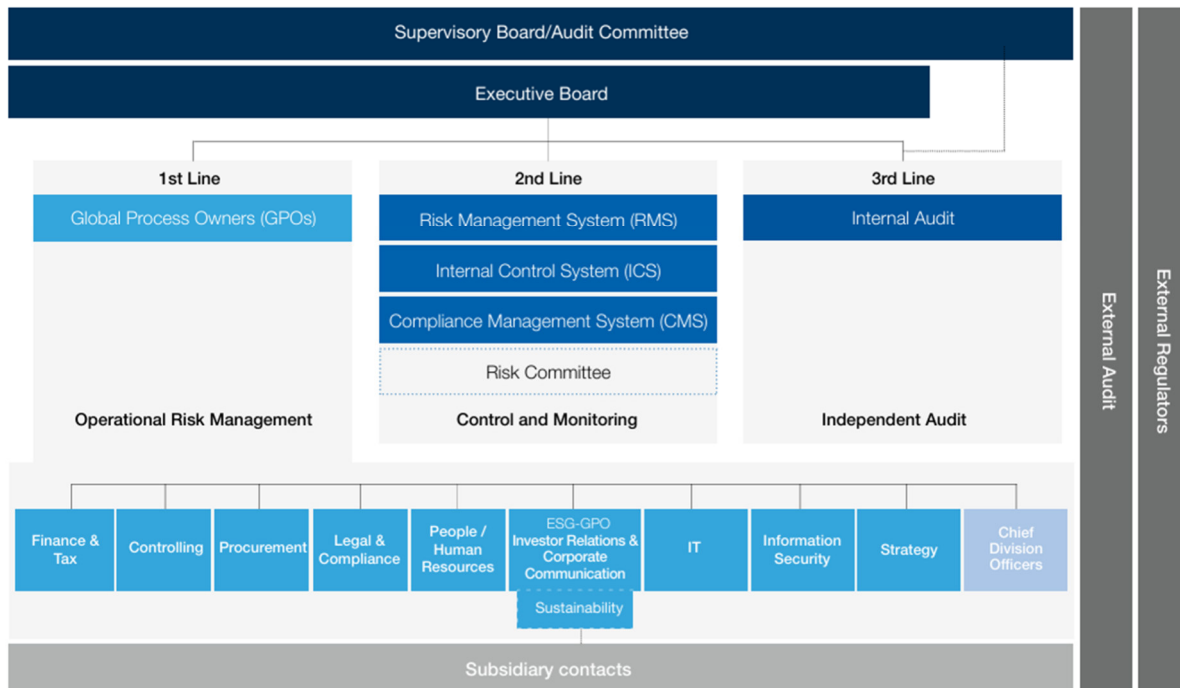
Furthermore, the Nemetschek Group prepared its Group Non-Financial Statement for 2025 in accordance with CSR-RUG, in compliance with the German Commercial Code and in alignment with the European Sustainability Reporting Standards (ESRS).

Visit our website to learn more about the Non-Financial Statement for 2025:
<https://ir.nemetschek.com/en/annual-report-2025>

Sustainability Structures

Sustainability-related impacts, risks, and opportunities are managed by the Executive Board and the Supervisory Board. The Group-wide risk and opportunity management is the responsibility of the Executive Board of Nemetschek SE, under the supervision of the Supervisory Board, and is aligned with the Three Lines of Defense model of the Group Management Report.

The Global Process Owners (GPO), who lead a corporate function at Nemetschek SE and have “Environment, Social and Governance” (ESG) expertise in their respective fields, are responsible for the quarterly collection, assessment, and management of ESG relevant impacts, risks, and opportunities. The initiation of appropriate actions and the measurement of their effectiveness are the responsibility of the respective GPOs. The ESG-GPO oversees the identification, assessment, and management of ESG-relevant impacts, risks, and opportunities by the GPOs within the existing process and determines the ESG relevance of new impacts, risks, and opportunities. The ESG-GPO role is intended to ensure appropriate coordination of ESG-relevant information for the global risk management function and the Risk Committee (second “line of defense”). The Group Internal Audit function (third “line of defense”) acts as an independent control body for the Executive Board and the Supervisory Board. Governance in the Group with regard to sustainability matters is organized as shown below as of December 31, 2025.



Visit our website to learn more about our Sustainability approach:
<https://www.nemetschek.com/en/shape-sustainable-future>

Employees & Society

At the Nemetschek Group, the focus is on employees. The Nemetschek Group believes that satisfied, successful, and healthy employees are crucial to sustainable business development. The Group's management maintains an open dialog with all employees at all levels and has set priorities and directions for HR work in the company.

However, this social responsibility is not limited to only the employees at the Group. It also applies to clients, partners, suppliers, and society. The Nemetschek Group Code of Conduct (CoC) states the importance of acting responsibly in relation to all our stakeholders (also regarding human rights topics).

In addition to the CoC, the **People Letter of Commitment** defines basic standards and requirements for fundamental leadership and employee topics as well as for the key areas of talent acquisition, performance assessment and health management.

Our actions to prevent Modern Slavery & Human Trafficking

One of our foremost objectives is ensuring that critical compliance incidents do not happen in the first place.

The Nemetschek Group recognizes that Modern Slavery & Human Trafficking is still a global problem in our society. Our aim must therefore be to address this problem in a transparent manner and to recognize our responsibility by making all our employees and business partners & suppliers aware of the problem and the risks and by working together to find a sustainable solution.

The Nemetschek Group is strongly committed to ensuring that our operations and supply chains are free of Modern Slavery & Human Trafficking and acknowledges its responsibility to the Modern Slavery Act 2015 and will ensure transparency within the company and with suppliers of goods and services to the company.

We at the Nemetschek Group have already been able to implement some measures on the topic of Modern Slavery & Supply Chain. However, the entire complex of topics is to be successively expanded over the next few years on a risk-based basis.

The Nemetschek Group have achieved or will achieve these aims by our initiative to identify and mitigate risks in the following ways (but not limited to):

- a) By having transparently published our group-wide Code of Conduct (CoC), which also addresses important values and rules on the subject of human rights in a way that is binding for all employees
- b) By having transparently published our Supplier Code of Conduct (SCoC), which also addresses important values and rules on the subject of human rights
- c) By having transparently published our official board letter (tone from the top)
- d) By transparent and annual publication our Group Annual Report and Non-Financial Statement in line with the European Sustainability Reporting Standards
- e) By developing our group-wide Compliance Management System (CMS) also with a noticeable focus to human rights and sustainability aspects
- f) By implementing various Compliance and CSR/ESG experts as well as group-wide networks for exchange and collaboration
- g) By having finalized our group-wide Compliance Risk Analysis in 2022, also with regard to human rights aspects and Supply Chain Management processes

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- h) By having finalized an initial Modern Slavery Risk Analysis in 2023 with regard to Group locations and sales countries. This Modern Slavery Risk Analysis is repeated annually and has been conducted in 2025 as well.
- i) By implementing a risk-based Business Partner Due Diligence Process (Integrity Check) also with regard to human rights aspects by including and considering the Global Slavery Index (GSI) in the selection of business partners & suppliers
- j) By integrating our group-wide Supplier Code of Conduct (SCoC) in important supplier contracts on a risk-based basis
- k) By expanding the field of Contract Compliance and using risk-based compliance & human rights clauses in business partner & supplier contracts
- l) By having transparently implemented and communicated our group-wide digital whistleblowing system (also accessible for third parties) and by constantly encouraging the reporting of any concerns and by protecting whistleblowers
- m) By having communicated and trained a Supply Chain Compliance Guidance
- n) By expanding group-wide risk-based Supply Chain Due Diligence & Mapping identifying which of our business partners & suppliers operate in countries that are known to present significant risks of Modern Slavery
- o) By constantly reviewing & monitoring our supply chain processes, contracts and contractors
- p) By expanding and providing customized trainings and awareness communication for all employees
- q) By constantly reviewing and assessing our internal practices – checking all employees are paid at least the minimum wage and have the right to work
- r) By having Zero Tolerance to Modern Slavery & Human Trafficking

We encourage our employees to report behavior that may violate our Code of Conduct (CoC). To do so, they can contact their superiors, the HR manager responsible, the local Compliance coordinator or the Corporate Legal & Compliance Department directly. In addition, violations may be anonymously reported by using our group-wide digital whistleblowing system. This system is transparently accessible via the website and is also open to our business partners & suppliers (third parties).

No significant compliance violations regarding Modern Slavery & Human Trafficking were identified during the reporting period. There were thus no cases of legal action.

The Nemetschek Group will not knowingly support and/or do business with any business partners & suppliers who are involved in Modern Slavery and/or Human Trafficking.

In case of any Non-Compliance the Nemetschek Group reserves the right to take appropriate measures, including the termination of business relationships.

Other Relevant Information

Each year the Nemetschek SE publishes an Annual Report also including a Non-Financial Statement in accordance with CSR-RUG, in compliance with the German Commercial Code and in alignment with the European Sustainability Reporting Standards (ESRS). Moreover, the Nemetschek Group annually publishes an Australian Modern Slavery Act Statement on behalf of all relevant reporting entities.

Through these statements, the Nemetschek Group fully satisfies its disclosure obligations under various international laws.

Approval of the Statement

The UK Modern Slavery Act Statement will be reviewed on a yearly basis by Corporate Legal & Compliance. This statement has been examined and approved by Nemetschek Group's Executive Board on June 2nd, 2026.

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