

## EcoOnline Group Modern Slavery and Human Trafficking Statement 2024

At EcoOnline we believe in the power of technology to reshape how organisations protect their people and the planet, paving the way for a safer, more sustainable future. Modern slavery and human trafficking is the antithesis of our mission and we will not tolerate it in our business or in our supply chain. Emphasising our commitment, as a developer of innovative technology solutions in the Environment, Health & Safety and Sustainability space, EcoOnline considers the eradication of forced labour and modern slavery a top priority and deploys dedicated resources to achieve its obligations.

Compliance with the UK's Modern Slavery Act 2015 and equivalent legislation around the world is a crucial part of maintaining the fundamental human rights that epitomise our mission.

To ensure compliance, EcoOnline maintains a strict policy framework, invests in staff training and measures its effectiveness through key performance indicators. The Group also implements a robust due diligence programme that enables the assessment of risk and identification of control gaps, employing self-assessment questionnaires, entity screening and global database checks to achieve the desired level of compliance.

EcoOnline evaluates its exposure and the likelihood of modern slavery contraventions on an ongoing basis. The Group takes a risk-based approach, focussing on its most critical suppliers and considers factors such as geographical location, type of industry, industry risk indicators, total spend and any previous assessments.

### 1. Opening Statement, Chief Executive Officer

The EcoOnline Group of companies is committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chain and imposes the same high standards on our suppliers. As a Group headquartered in the UK, EcoOnline believes that compliance with the UK's Modern Slavery Act 2015 (the "Act") is a baseline for us to identify and proactively tackle risks directly related to or associated with modern slavery and human trafficking across our business operations and supply chain.

While the Act may not be directly applicable to all of the Group's subsidiaries or jurisdictions within which we operate, all subsidiaries operating under the EcoOnline umbrella apply the same strict due diligence.

### 2. EcoOnline Global

Headquartered in the United Kingdom, the Group also maintains operational bases in Canada, Denmark, Finland, New Zealand, Norway, Republic of Ireland, Sweden, and the United States.

EcoOnline is a software-as-a-service (SaaS) provider developing innovative technology solutions to support the digital and environmental evolution being embraced by our customers to build a sustainable world. Product coverage includes Environment, Health & Safety (EHS) software, Lone Worker Safety, Chemical Safety, Crisis Management, Environmental Management and Sustainability reporting, and our teams build and implement transformative software that ensures customers are not only compliant but are achieving far greater goals that they have set for themselves. EcoOnline puts people first and champions the protection of people and the planet.

The Group has a global market presence, serving more than 10,000 customers across the United Kingdom, North America, Nordics and the Asia Pacific regions, and maintains a diverse workforce of 600+ talented employees.

In its aim to deliver SaaS solutions and become the preferred provider of EHSQ tools, services and solutions, the Group works with a range of suppliers. Accordingly, to enable the effective management of its suppliers and supply chain, EcoOnline categorises its suppliers:

- **Infrastructure Critical** (*includes service hosting providers and providers of security monitoring services*)
- **Strategic Business Services** (*includes financial services institutions, insurance providers, consultants and law firms*)
- **Other Technology Providers** (*includes technology suppliers which provide tools and services supporting day-to-day operations*)
- **Other Business Services** (*includes non-technology suppliers which provide tools and services supporting day-to-day operations*)

Considering EcoOnline's global footprint and its need to engage a wide variety of suppliers, the Group understands the risk related to the possibility of human rights deviations within its supply chains. This statement acknowledges such risk and confirms that the Group takes a zero-tolerance approach in relation to such deviations, as it is committed to the eradication of all forms of modern slavery and human rights contraventions.

### 3. Policies

EcoOnline, as part of its commitment to mitigate modern slavery and human rights contraventions, implements a policy suite to guide best practice. The policy suite comprises:

- Anti-Harassment and Anti-Bullying Policy;
- Diversity, Equality and Inclusion Policy;
- Supplier Code of Conduct (encompassing issues such as fair treatment, anti-discrimination, wages/benefits and working hours, freedom of association and protection of workers);
- Vendor Management Policy (setting out procedures for supplier due diligence); and
- Whistleblowing Policy.

### 4. Due Diligence

To monitor and mitigate the possibility of modern slavery and human rights contraventions, including human trafficking within the Group's supply chain, a supplier due diligence policy and procedure is implemented. Both policy and procedure are applied as part of EcoOnline's supplier onboarding and is completed prior to signing agreements with contractors, consultants, partners, collaborators or outsourced providers who perform services for or on behalf of the Group. Due diligence at EcoOnline comprises:

- Suppliers must respond to a self-assessment questionnaire which includes specific sections on human rights, decent working conditions, environmental responsibility, sustainability, financial crime, modern slavery, information security and data protection;
- Suppliers must demonstrate and evidence that they have a policy in place prohibiting human rights contraventions, bribery, corruption and modern slavery;
- Suppliers must commit to compliance with relevant EcoOnline policies;

- EcoOnline reviews and undertakes an independent KYC assessment of the prospective supplier (biennial reviews for existing suppliers) to determine any actual or potential adverse impacts in relation to human rights, decent working conditions and other related statutes; and
- All contracting entities are screened against global databases for sanctions and state ownership.

EcoOnline's due diligence process is designed to:

- establish and assess areas of risk in its supply chain;
- monitor relevant risk categories across the business and supply chain; and
- mitigate risk associated with or directly related to modern slavery, human trafficking, sanctions violations, bribery, corruption, terrorist funding, financial crime and data protection.

## 5. Risk & Compliance

EcoOnline regularly evaluates the nature and extent of its risk exposure in relation to modern slavery and human rights contraventions potentially occurring within its operations and supply chain. The Group has adopted the OECD Due Diligence Guidance for Responsible Conduct ("RBC") and has represented this by embedding the guidance within its policy suite.

EcoOnline's strategy, therefore, comprises:

1. Embed RBC into policies and management systems;
2. Identify and assess actual and potential adverse impacts related to modern slavery and associated with the Group's operations, product development and service offerings;
3. Cease, prevent and mitigate risk;
4. Track implementation of corrective measures and continually improve results;
5. Communicate how risks are addressed; and
6. Develop, contribute to and provide remediation where appropriate.

## 6. Impacts

Considering that EcoOnline's core business is to provide SaaS solutions that protect people and the planet, and increase sustainability, the Group is well positioned to uphold its obligations as a credible global business. However, given EcoOnline's current market focus and base presence, the Group does not consider that it operates within high-risk regions with respect to modern slavery and human rights, or other related topics.

Suppliers which the Group seek to engage and subject to its due diligence process are required to partake in some level of human interaction, whether through product or service demonstrations, supplier discussions, pre contractual discussions or similar. As such, EcoOnline can determine risk early in its supplier onboarding process, holding prospective suppliers directly to account where the Group believes there are deviations from recognised, acceptable business practices.

EcoOnline implements a strict code of compliance and does not tolerate any form of slavery or human rights contraventions within its supply chain. The Group inserts relevant contractual clauses into its contracts, binding each party to comply with all applicable state, national, international and regional statutes, rules, directives, regulations or any other applicable

mechanism seeking to increase responsible business practices and limiting the proliferation of human rights contraventions. Where people or suppliers fail to recognise their obligations, EcoOnline will terminate its relationship with the relevant person or entity.

Based on an assessment of EcoOnline's 2024 global business activities and a sample review of its current critical suppliers, the Group considers that its overall exposure to risks related to modern slavery and any type of contravention of human rights occurring within its business processes and supply chain is very low.

## 7. Programme Effectiveness and Indicators

EcoOnline uses Key Performance Indicators ("KPIs") and Key Risk Indicators ("KRIs") to measure the effectiveness of its mitigations and controls in relation to modern slavery and human rights contraventions, including human trafficking, taking place within its business processes or supply chain. By way of example, some of the Group's KPIs are set out below:

Objective	Requirement / Action	Indicator(s)
New Suppliers meet the Group's minimum standards	Ensure all new suppliers: <ul style="list-style-type: none"> <li>- Undertake to comply with EcoOnline's policies and standards; or</li> <li>- Have in place equivalent policies and standards</li> </ul>	<ul style="list-style-type: none"> <li>- Total suppliers who have successfully completed due diligence</li> <li>- Total suppliers accepted</li> <li>- Total suppliers rejected</li> <li>- Total suppliers not meeting minimum standards</li> </ul>
Contractual recourse as part of standard supply contracts	Review, amend and agree contract wording: <ul style="list-style-type: none"> <li>- Warranties on modern slavery compliance</li> <li>- Termination rights for non-compliance</li> <li>- Mitigations (mandated audits) for high-risk suppliers</li> </ul>	<ul style="list-style-type: none"> <li>- Volume of suppliers who accept standard EcoOnline service contract</li> <li>- Volume of suppliers with amended contracts, i.e. diluted rights / minimal protections</li> </ul>
EcoOnline's staff are trained and aware of modern slavery and human rights risks	Implement modern slavery and human rights training for all staff.	Staff training completion rates

## 8. Training

EcoOnline invests resources to educate and train staff to recognise risks associated with modern slavery, human rights contraventions and any other related topics that might occur in the Group's business processes and supply chain. Through the implementation of mandatory internal training programmes, employees are encouraged to identify and report breaches of the Group's policies and standards, and to escalate any concerns linked with modern slavery and human rights. Furthermore, training encompasses recognising the consequences of failing to report possible deviations and the rationale behind ensuring that the Group and its people respect their obligations to limit risk. The Group's Whistleblowing Policy is designed to protect the anonymity of reports, in order to encourage those reports to be made.



Examples of training courses implemented in the reporting period include:

- eLearning Conduct and Ethics (how to detect and report suspicious behaviour); and
- eLearning Whistleblowing (how to report, anonymously, contraventions using the whistleblowing solution).

9. Conclusion

In commitment to the Group’s obligations to combating modern slavery, human trafficking and any other connected human rights contraventions, EcoOnline’s obligations are endorsed by the Board of Directors and facilitated by the Group’s Executive Leadership Team (ELT). Furthermore, EcoOnline appoints a Head of Legal to assess, monitor and report on the Group’s level of compliance and risks associated with modern slavery, human trafficking and human rights.

This statement is made in accordance with Section 54(1) Modern Slavery Act 2015 and constitutes EcoOnline’s slavery and human trafficking statement for the financial year 2024, commencing 1 January 2024 and ending 31 December 2024.

<i>Tom Goodmanson</i> -----	15-04-2025   09:43 CEST -----
Tom Goodmanson	Date
CEO	
EcoOnline Group	

EcoOnline group companies covered by this statement:

*Erling Lux Holdco SARL; Erling Lux Bidco SARL; Erling Holdco AS; EcoOnline AS; Airsweb Limited, Biome Environmental Limited, Ecometrica Limited, EcoOnline AB, EcoOnline ApS, EcoOnline AS Limited, EcoOnline ePermits Limited, EcoOnline ePermits Holdings Limited, EcoOnline GmbH, EcoOnline Info Exchange Limited, EcoOnline North America Inc., EcoOnline Oy, EcoOnline Simple Compliance Limited, EcoOnline Sypol Limited, EcoOnline UK Limited, EcoOnline US LLC, Mango Limited, Mango Software Limited, Nordic Port AB and Safe Apps Limited.*