

# Modern Slavery and Human Trafficking Statement 2025

12<sup>th</sup> March 2026



## 1. Introduction and statement of commitment

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and equivalent legislation around the world. It sets out the steps taken by EcoOnline during the financial year 2025 to prevent modern slavery and human trafficking in our business and supply chains.

EcoOnline Global and its subsidiaries (“EcoOnline” or the “Company”) is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers.

The Company considers that compliance with the Modern Slavery Act 2015 is a crucial step in mitigating related risks and maintaining human rights. To ensure compliance, EcoOnline maintains a strict policy framework, invests in staff training and measures its effectiveness through key performance indicators. The Company 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. While the Act may not be applicable to all the Company’s subsidiaries or jurisdictions within which it operates, all subsidiaries operating under the EcoOnline umbrella apply the same strict due diligence as part of the corporate group.

EcoOnline, by following the OECD Due Diligence Guidance for Responsible Business Conduct, evaluates its exposure and the likelihood of modern slavery contraventions on an ongoing basis. The Company takes a risk-based approach, focussing on its most critical Suppliers and considers inter alia factors such as geographical location, type of industry, industry risk indicators, total spend and any previous assessments. Emphasising its commitment, as a developer of innovative technology solutions in the Environment, Health & Safety and Sustainability space, the Company considers the eradication of forced labour and modern slavery a top priority and deploys dedicated resources to achieve its obligations.

## 2. Organisational structure

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

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.

## Modern Slavery and Human Trafficking Statement

Notably, the Company has a global market presence, serving more than 10,000 customers across the United Kingdom, Europe, 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 Company 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 Company understands the risk related to the possibility of human rights deviations within its value chains. This statement acknowledges such risk and confirms that the Company 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.

To find out more about EcoOnline, please visit: <https://www.ecoonline.com/>

### 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 bribery and Corruption Policy
- Anti money Laundering and Counter Terrorist Funding Policy
- Codes of Conduct (Employee and Supplier)
- Equal Opportunities Policy
- Grievance Policy
- Recruitment Policy
- Supplier Due Diligence Policy
- Whistleblowing Policy

### 4. Due Diligence

To monitor and mitigate the possibility of modern slavery and human rights contraventions, including human trafficking within the Company'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, in any case, is completed prior to signing agreements with

## Modern Slavery and Human Trafficking Statement

contractors, consultants, partners, collaborators or outsourced providers who perform services for or on behalf of the Company. 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 sign 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.
- 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.
- 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 horizon scans and 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 Company has adopted the OECD Due Diligence Guidance for Responsible Business Conduct ("RBC") and has represented this by embedding the guidance within its policy suite.

EcoOnline's strategy, therefore, comprises:

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

## 6. Supply Chain Management

## Modern Slavery and Human Trafficking Statement

Considering that EcoOnline's core business is to provide SaaS solutions that protect people and the planet, and increase sustainability, the Company is well positioned to uphold its obligations as a credible global business. However, given that EcoOnline's market focus is predominantly the United Kingdom, Europe, North America, Nordics and the Asia Pacific regions, the Company 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 Company 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 Company 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 Company 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 terminates its relationship with the relevant person or entity.

Based on an assessment of EcoOnline's 2025 global business activities and a sample review of its current critical suppliers, the Company 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 low.

## 7. Training and Awareness

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 Company's business processes and supply chain. Through the implementation of mandatory internal training programmes, employees are encouraged to identify and report breaches of the Company'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 Company and its people respect their obligations to limit risk.

Examples of training courses implemented in the reporting period include:

- eLearning Conduct and Ethics (covers familiarity of company ethics and code of conduct policies)
- eLearning Anti-bribery and Corruption (inc. how to detect and report suspicious behaviour, and familiarity with relevant policies)

## 8. Programme Effectiveness and Indicators

## Modern Slavery and Human Trafficking Statement

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 Company’s KPIs are provided below:

Objective	Requirement/Action	Indicator(s)
New Suppliers meet the Company’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 risk(s)	Implement modern slavery and human rights training for all staff.	Staff training completion rates

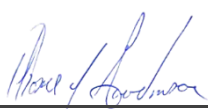
## 9. Governance

In commitment to the Company’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 Company’s Executive Leadership Team (ELT). Furthermore, EcoOnline appoints a Head of Legal and a Risk Manager to assess, monitor and report on the Company’s level of compliance and risks associated with modern slavery, human trafficking and human rights.

## 10. Approval

This statement is made in accordance with Section 54(1) Modern Slavery Act 2015 and equivalent legislation around the world. It constitutes EcoOnline’s slavery and human trafficking statement for the financial year 2025, commencing 1 January 2025 and ending 31 December 2025.

This statement was approved by the Board of Directors of EcoOnline on 17<sup>th</sup> March 2026. It is signed on behalf of the Board by:



**Name:** Tom Goodmans

**Position:** CEO, EcoOnline

17<sup>th</sup> March 2026

Date

**Modern Slavery and Human Trafficking Statement****EcoOnline group companies covered by this statement:**

*Airsweb Limited; Biome Environmental Limited; D4H Technologies Limited; D4H Technologies USA Inc.; Ecometrica Limited; EcoOnline AB; EcoOnline ApS; EcoOnline AS; EcoOnline AS Ltd; EcoOnline ePermits Holdings Limited; EcoOnline ePermits Limited; EcoOnline GmbH; EcoOnline Info Exchange Limited; EcoOnline North America Inc.; EcoOnline Oy; EcoOnline Simple Compliance Limited; EcoOnline Sypol Limited; EcoOnline UK Limited; EcoOnline USA LLC; Erling Holdco AS; Erling Lux Bidco SARL; Erling Lux Holdco SARL; Erling HoldCo AS; Mango Limited; Mango Software Limited; Nordic Port AB; Safe Apps Ltd.*