



## Modern Slavery Statement FY 2025

This Modern Slavery and Human Trafficking Statement (the “**Statement**”) is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “**Act**”) for the financial year ending December 31, 2025, and is EcoVadis’ sixth Statement under the Act.

The Statement sets out the steps that we have taken, and are continuing to take, to ensure that modern slavery and human trafficking is not present in our organisation or our business operations, including within our supply chains.

The Statement is made by EcoVadis SAS (“**EcoVadis**”) on a group-wide basis in respect of the following EcoVadis group companies:

- EcoVadis, Inc.;
- EcoVadis Hong Kong Limited;
- EcoVadis (Mauritius) LTD;
- EcoVadis Polska Sp. z o.o.;
- EcoVadis Canada Limited;
- EcoVadis Japan K. K.;
- EcoVadis Germany GmbH;
- EcoVadis Spain S.R.L.; and
- EcoVadis UK Limited.
- EcoVadis Australia Pty Ltd
- EcoVadis Mexico S. DE R.L. DE C.V
- EcoVadis Malaysia Sdn. Bhd
- EcoVadis Middle East Sustainability Services - L.L.C - S.P.C
- Ulula VN Company Limited
- Ulula Canada Inc.

### ➤ **OUR COMMITMENT**

Modern slavery and human trafficking are serious human rights violations that go against EcoVadis core values. We are committed to meeting our legal and ethical duties to fight these abuses. We therefore implement clear policies, thorough due diligence, and extensive training. Through this we ensure all employees understand the risks, EcoVadis commitment to addressing them, and their responsibility to follow EcoVadis policies and procedures.

Addressing the complexity of modern slavery and human trafficking demands continuous risk assessment within our business and across our supply chains. We are dedicated to the ongoing improvement of our policies and practices, aiming to eliminate the presence of modern slavery and human trafficking from our operations and supply chains. Furthermore, we actively support our customers in tackling these critical issues within their own supply chains.

This Statement outlines the prioritized steps we are taking to achieve our commitment to eliminating modern slavery and human trafficking risks within our business. These actions are based on our assessment of relative risks and are designed to strengthen our existing approach.

➤ **ABOUT ECOVADIS**

EcoVadis is the leading sustainability intelligence and resilience platform for global supply chains, providing detailed insights for compliance, improvement and acceleration on your sustainability journey. We employ nearly 2000 people across 15 offices, including 50 people in the UK. We currently have offices in France, the United States, the United Kingdom, Germany, Poland, Canada, Tunisia, Malaysia, Mauritius, Mexico, Japan, Hong Kong, Spain, Singapore and Sweden.

Founded on the belief that businesses can drive positive global change through their supply chains, we are committed to helping clients and their suppliers reduce sustainability risks and improve social and environmental impact. EcoVadis provides tools that make progress visible — combining AI-powered insight and human expertise to turn responsibility into results. Our solutions go beyond ratings to help businesses see, understand, and improve sustainability performance across their networks.

These solutions include:

- **EcoVadis Ratings** - Provides a consistent, comparable view of supplier sustainability performance, helping companies benchmark progress and drive improvement across key environmental, social, and ethical topics.
- **EcoVadis IQ Plus with Vitals** - Delivers tailored, real-time risk intelligence across entire supply bases, enabling proactive compliance and smarter sustainability strategy implementation. EcoVadis Vitals is integrated into IQ Plus, offering enhanced risk screening through a quick, light-touch supplier questionnaire.
- **Carbon Action Manager** - A user-friendly, AI-powered carbon management tool that helps companies identify emissions hotspots, prioritise engagement, and collaborate on decarbonisation. By providing reliable primary data and insights, it supports measurable progress toward Net Zero goals.
- **EcoVadis ESG Ratings for Sustainable Finance** - Enables financial institutions to integrate ESG performance data into investment and lending decisions. By directing capital toward more sustainable businesses, finance leaders reinforce transparency and accelerate positive impact.
- **Ulula** - Enables real-time worker voice insights to help companies identify and address social and labor risks within their supply chains. By combining Ulula's worker engagement technology with EcoVadis data, companies gain a deeper understanding of on-the-ground conditions and can drive more meaningful human rights due diligence.

Since its founding in 2007, EcoVadis has grown to become the world's largest provider of business sustainability ratings, with a global network of over 175,000

companies. While over 90% of rated suppliers are SMEs, with the largest concentration in Europe, our clients include global industry leaders such as Johnson & Johnson, L'Oréal, MARS, Salesforce, Michelin and BASF.

#### ➤ **OUR SUPPLY CHAINS**

As an office-based company, EcoVadis has a moderately complex supply chain. Our main purchasing categories by spend are office space, IT services and equipment, and consulting services. Accordingly, our primary supply chain risks are ethical business practices, the sustainability performance of lower-tier suppliers, and social & environmental risks related to the procurement of IT equipment and services. The majority of our suppliers are SMEs in Europe, with which EcoVadis aims to build long-term relationships to enhance collaboration on sustainability and mitigate supply chain risks. We recognize that our first-tier suppliers can have extensive supply chains, connecting us with many more second-tier suppliers globally. In some cases, this adds an additional layer of complexity to our supply chain.

As a globally operating SaaS company, a large portion of our social and environmental impact arises from our supply chain. Therefore, we are committed to choosing suppliers who mirror our high standards on environmental and social sustainability and transparency. We expect our suppliers to respect and obey applicable laws, regulations, and ethical standards at all levels of their operations. This includes, but is not limited to, labor and human rights practices, corporate governance, occupational health and safety, and sustainability. In particular, we require our suppliers to act beyond the minimum legal requirements in relation to human rights.

To fulfil this commitment, we implement a wide range of policies and actions to screen, assess, monitor, and improve the sustainability performance of our supply chain partners.

#### ➤ **OUR POLICIES AND ACTIONS**

Our policies and procedures demonstrate our commitment to ethical conduct and integrity in all business relationships, ensuring the implementation of robust systems and controls to prevent modern slavery and human trafficking within our supply chains. Specifically:

- We use **standard Terms & Conditions in procurement contracts** to govern our relationships with suppliers of goods and services. These terms outline the obligations and standards we expect our suppliers to uphold regarding human rights. Specifically, our terms require suppliers to:
  - Respect universally recognized human rights;
  - Reject all forms of modern slavery, including child labor, forced labor, and human trafficking;
  - Comply with applicable environmental standards;
  - Promote diversity and prohibit employee discrimination;
  - Provide a safe and healthy working environment for all employees.

Non-compliance with these obligations constitutes a material breach, allowing us to terminate the supplier relationship. Additionally, suppliers must adhere to our Supplier Code of Conduct.

- Our **Supplier Code of Conduct** formalizes our commitment to addressing modern slavery and human trafficking by setting clear expectations for our suppliers, as well as their suppliers and subcontractors. As outlined in the Code, all suppliers and subcontractors must:
  - Strictly prohibit child labor and any form of forced labor within their business and supply chain;
  - Refrain from employing children for service provision;
  - Not employ slaves, trafficked individuals, or workers subject to coercion, including forced, prison, or indentured labor;
  - Provide workplaces that support freedom of association, promote diversity, and eliminate all forms of discrimination and harassment;
  - Ensure working environments meet all relevant local health and safety regulations to protect employees;
  - Offer fair remuneration, benefits, and decent working conditions for their employees.

The Supplier Code of Conduct is available in English on our website and is included in our standard procurement contracts as part of the 'EcoVadis Supplier Welcome Pack.' We reserve the right to terminate supplier relationships that fail to meet the standards set by the Code.

- We conduct **Sustainability Risk Screening** using the EcoVadis IQ solution, which assesses and maps companies for ethical, social, and environmental risks through predictive intelligence. In 2025, 85% of our suppliers by spend were screened using this solution.
- We conduct **Sustainability Performance Assessments** using EcoVadis ratings, evaluating our suppliers' policies, actions, and results regarding child labor, forced labor, and human trafficking. We also review external sources for any adverse media coverage related to human rights or modern slavery. In 2025, 63% of our suppliers by spend were covered by EcoVadis ratings.
- Our **Labour Practices and Human Rights Policy** underscores our commitment to providing employees with a supportive work environment where they can thrive. The policy outlines our dedication to ensuring a safe and healthy workplace, free from harassment and discrimination. We offer competitive wages that exceed legal requirements in each country where we operate, supported by a living wage analysis for 10 of our operating countries using Wage Indicators benchmarks. Additionally, our structured salary system ensures fair remuneration based on objective criteria. As part of our employee benefits, we also provide access to healthcare and pension plans for all staff.
- We have adopted the **EcoVadis Code of Ethics** to support our continued growth as a company committed to sustainability. The Code sets clear expectations for employee conduct, emphasizing quality, transparency, and

integrity. We expect all employees to fully comply with the Code, and require them to read and acknowledge it at least once annually.

- Our **Whistleblowing Procedure** encourages employees to report any actual or potential malpractice within EcoVadis, including breaches of our Code of Ethics and other policies. It provides secure channels to ensure that reported breaches are thoroughly investigated and appropriately addressed. Our whistleblowing system complies with the EU Whistleblowing Directive and guarantees confidentiality and anonymity. We treat all ethics-related concerns with the highest priority and handle them in accordance with the Whistleblowing Procedure.

➤ **OUR EMPLOYMENT PROCESSES**

We are committed to being a responsible employer, ensuring fair recruitment and treatment of employees. Our staff onboarding and employment processes are designed to prevent any form of modern slavery or human trafficking within our organization. In 2025, 99% of our staff were employed on permanent contracts, with the remainder on fixed-term contracts, paid internships with a significant training component, or as independent contractors. Specifically, we:

- We do not routinely use temporary agency staff;
- We recruit and select employees in a fair, lawful, and professional manner, conducting right-to-work checks in compliance with applicable laws in all jurisdictions where we operate;
- We strive to offer remuneration and benefits that exceed the required minimum for all our employees;
- We treat all employees fairly throughout their employment and provide clear procedures for raising complaints or grievances related to their work relationship with us;
- We ensure that both we and our employees adhere to our Labour and Human Rights Policy, which outlines our commitment to providing working conditions where all employees can thrive.

➤ **AREAS OF RISK**

No incidents of modern slavery or human trafficking were detected in our own business in 2025. We do not identify any immediate risk of such practices occurring within our operations. However, we acknowledge that there may be a low risk within our supply chain. Ongoing risk screening as part of our supplier onboarding process indicates that the risk remains low for our suppliers. Additionally, we have an escalation plan in place should higher risks be identified in the future.

We will continue to conduct diligent monitoring and take proactive steps to maintain a low risk of modern slavery and human trafficking, ensuring that no incidents occur within our supply chain.

➤ **OUR STAFF TRAINING PROGRAMS**

We ensure all employees are equipped to understand and address modern slavery and human trafficking risks through a structured training program. Our New Employee Onboarding process includes training on critical internal policies and procedures, specifically the Staff Handbook, the Labour Practices and Human Rights Policy, the Code of Ethics, and the Whistleblowing Procedure. We also recommend additional training focused on sustainability and risk management during onboarding. Furthermore, all employees are required to complete Annual Refresher Training, which is a mandatory Ethics and Compliance Training. This training covers the Code of Ethics, the Whistleblowing Procedure, and the UK Modern Slavery Act, ensuring employees understand the risks of modern slavery and human trafficking, are able to identify potential warning signs, and know the correct procedures for reporting concerns within the organization and the supply chains. Finally, training is further tailored to address specific responsibilities, for instance, business managers receive additional training focused on procurement and risk management, reflecting their unique roles.

➤ **EFFECTIVENESS**

We have not identified any instances of modern slavery or human trafficking within our operations to date. We are confident in the effectiveness of our current efforts to prevent these issues within our business and supply chains.

To ensure continued effectiveness, we have a dedicated Ethics and Compliance Team, led by the Ethics and Compliance Officer, who reports to the Head of Risk and Compliance. This team actively monitors and ensures adherence to our Code of Ethics, procurement practices, and other policies related to modern slavery. Additionally, the Ethics and Compliance Council works closely with the EcoVadis Executive Committee to oversee the program's effectiveness, while promoting a strong ethical culture throughout the organization.


➤ **LOOKING FORWARD**

Our commitment is to maintain low levels of risk concerning modern slavery, human trafficking, and harmful working practices across our operations and supply chains. Although our policies and processes are continuously monitored, we are always seeking opportunities to enhance our approach and prevent potential incidents.

We conduct annual reviews of our risk profile to ensure a proactive approach, and we are committed to taking appropriate action should any areas for improvement be identified. We will maintain close monitoring of our efforts and report on our progress in our next statement under the Act.

This Statement has been approved unanimously by the Board of Directors of EcoVadis SAS on 09.04.2026.

Frederic Trinel  
**Co-Founder and Co-CEO**

Signé par :  
  
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