

Modern slavery statement of Eficode UK Ltd.

Introduction

Our values are the driving force behind everything we do. We are committed to making a positive impact on the world around us and take pride in providing our Eficodeans with safe working conditions and fair treatment. We understand the greatest risk and opportunity for change lies within our supply chain, and we are committed to addressing this challenge head-on. By working together with our suppliers, we can create a better future for everyone involved.

We are guided by the UN's principles on Business and Human Rights and expert advice from leading charities and companies fighting against Modern Slavery. Our commitment to this cause is unwavering and transparent - we will keep you updated every step of the way.

This report outlines our current and future action plans to detect, prevent, and address any instances of labour exploitation within our UK business and associated supply chains.

Henri Hämäläinen



In compliance with the UK Modern Slavery Act 2015 for the financial year ending 31 December 2025, we present this statement for public knowledge. This statement has been approved by Henri Hämäläinen, Director, Eficode UK Limited, and serves as our commitment to address modern slavery issues.



What is Modern Slavery?

Modern slavery exploits other people for personal or commercial gain and is all around us - often out of sight.

It takes many forms, and the most common are:

- **Human trafficking:**

The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.

- **Forced labour:**

Any work or services people are forced to do against their will, usually under threat of punishment.

- **Debt bondage/bonded labour:**

The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.

- **Descent-based slavery (where people are born into slavery):**

A very old form of slavery where people are treated as property, and their "slave" status has been passed down the maternal line.

- **Child slavery:**

When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery.

- **Forced and early marriage:**

When someone is married against their will and cannot leave. Most child marriages can be considered slavery.

- **Domestic servitude:**

Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people. However, when someone is working in another person's home, they may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection.

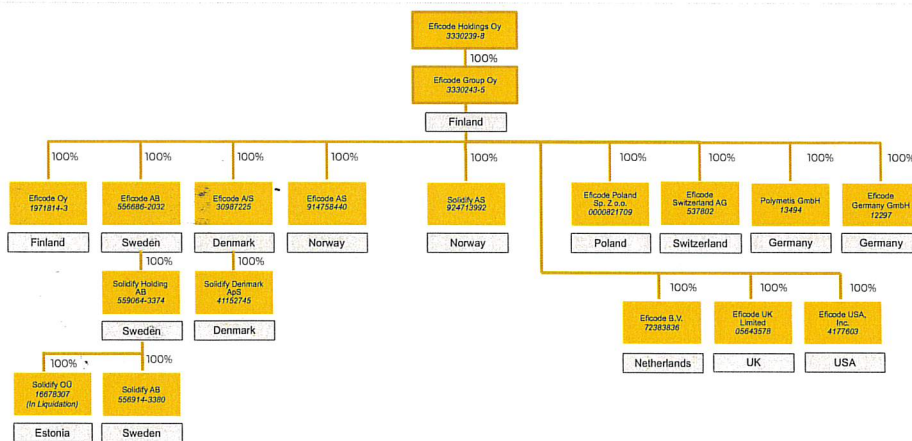
Source: *Anti Slavery.org*



Our UK business and structure

Eficode UK Limited is a subsidiary of Eficode Group OY, the leading DevOps company in Europe, operating across circa ten countries and employing approximately 650 professionals. All our sales are business-to-business, and most engagements are conducted remotely. At the end of the reporting year, we directly employed 65 people within our UK branch.

Eficode Group structure as of September 12, 2025



Our supply chain

Most of the services delivered by Eficode UK are done by our employees, with a small percentage delivered by subcontractors. We partner with a number of third-party vendors for the resale of software products, and source products and engage services that support us in our work, like IT equipment, office equipment, professional services and external contractors.

Our commitment

We are dedicated to eradicating modern slavery and labour exploitation within our business and supply chains. We will regularly evaluate and communicate our progress and effectiveness in combating these issues.



Our performance in 2025 within Eficode UK Limited

In an effort to be as transparent as possible, we have outlined our progress towards last year's priorities using a straightforward RAG system, which is shown below:

Objective	Status	Overview
Share our Supplier Code of Conduct		Our Supplier Code of Conduct is publicly available on our website and provided to new suppliers.
Train 100% of employees on modern slavery topics		All new employees have completed mandatory training, provided as an e-learning module, which includes a knowledge test.
Complete 100% of annual training refreshers by the due date		100% of annual refresher training was completed by the due date.
Ensure all contracts contain provision to combat Modern Slavery.		All UK contracts include this as standard. As Eficode Group continues to globalize to a single way of doing business, anti-modern slavery clauses will be rolled out into all geographical regions as standard

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Our priorities for the year

Within Eficode UK we strive to grow while maintaining our standards. We will continue to educate our workforce on the risks of modern slavery and focus on raising awareness within our supply chains and promoting ethical practices.

Within the wider Eficode Group, we take our responsibilities seriously and are dedicated to upholding the highest ethical standards throughout our organisation and supply chain. During the next financial year we aim to continue to strengthen our approach to tackling modern slavery and providing transparent reporting on our progress.