

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.

During the reporting year Eficode fortified its presence in the UK through the acquisition of Clearvision (CM) 2005 Limited, now Eficode UK Limited. 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.

Ilari Nurmi

In compliance with the UK Modern Slavery Act 2015 for the financial year ending 30 June 2023, we present this statement for public knowledge. This statement has been approved by Ilari Nurmi, 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 OY, the leading DevOps company in Europe, operating across circa ten countries and employing approximately 600 professionals. All our sales are business-to-business, and most engagements are conducted remotely. At the end of the reporting year, we directly employed 82 people within our UK branch.

Our supply chains

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.

Working group

In June 2021, Eficode UK (formerly Clearvision) stepped forward and set up a working group. Its aim being to coordinate the UK team's efforts regarding the fight against modern slavery - to address, prevent and tackle it. The group includes representatives from a range of departments, namely Legal, Compliance, Human Resources and Bids and Proposals. Even though several measures related to our fight against modern slavery have now become part and parcel of routine operations, the working group convenes at least once yearly. This allows us to assess our progress, identify gaps and plan our objectives for the forthcoming year.

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. Each year, we will use our findings to improve and make even greater strides towards ending modern slavery.

Our performance in 2022/23 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
Complete 100% of the supplier risk assessments by the due date	Green	All new suppliers and annual review modern slavery risk assessments have been completed by the deadlines set. No medium or high risks identified
Create a code of ethics and share it with all suppliers	Orange	A comprehensive code has been prepared and internally approved for publication. This will be communicated with suppliers over the coming fiscal year
Improve the quality of employee training on modern slavery issues	Green	All employees have completed mandatory training, provided as an e-learning module hosted by Skill Cast, which includes a knowledge test
Complete 100% of annual training refreshers by the due date	Orange	98.5% of annual refresher training was completed by the due date
Establish a program of internal awareness activities that supports the formalised training program	Green	Awareness activities were delivered as planned
Find opportunities to collaborate to support our efforts to tackle modern slavery & labour exploitation	Green	A number of collaborations have begun this year, including network groups with small businesses that want to join together to tackle modern slavery as a larger force. Our UK branch is also collaborating with the rest of the Eficode business to review shared supply chains.

Our priorities for the year

Within Eficode UK we strive to grow while maintaining our standards. We will continue to complete annual risk assessments on time and work with our People team to increase the completion of training refreshers to 100%. We will 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 will continue to strengthen our approach to tackling modern slavery and providing transparent reporting on our progress.