

Impact, delivered

Modern Slavery Policy Statement

21st April 2025



Modern Slavery Policy Statement

Introduction

This document outlines the initiatives undertaken by Codec to recognise, understand, and mitigate potential risks associated with modern slavery in relation to our business operations and supply chains. It is our firm resolution to ensure that slavery and human trafficking do not exist within our operations or supply chains.

Codec, inclusive of its subsidiaries and affiliated entities, acknowledges the obligations under the Modern Slavery Act 2015. We are unwaveringly committed to a rigorous stance against slavery and human trafficking and to ensuring our corporate activities and supply chains are devoid of these practices.

Business Structure and Supply Chains

Codec, with its central office located in Dublin, Ireland, and additional operations in Belfast and London, provides an array of cloud-based software and digital solutions for public services. Our supply chains are primarily located in the countries we operate in.

Our business activities are mainly situated in the sphere of software development and technical operations, along with professional services like project management, customer support, service delivery, and implementation. Our services cater to an array of private and public sector organisations including local and national governments, educational bodies, regulatory authorities, and more.

Applicable Policies

Our unwavering commitment to prevent modern slavery or human trafficking in any segment of our operations or supply chains is reflected in our Anti-Slavery Policy. Codec strives to maintain ethical conduct and integrity in all our business interactions, establishing and enforcing potent systems and controls to ensure the absence of slavery and human trafficking within our operations or supply chains.

- **Human Resources Policy** - Our Modern Slavery Policy is incorporated into our Team Handbook, made accessible to all colleagues upon employment initiation. We have a strict policy against any form of violence, harassment, or intimidation against employees, their family, or close associates. We ensure that all employees are treated equitably, receive at least the national minimum wage, and aren't compelled to work beyond the legally permitted hours.
- **Procurement Policy** - Codec commits to performing procurement activities with transparency, fairness, and objectivity. Our selection of suppliers is influenced by their adherence to recognised environmental sustainability, business integrity, and Corporate Social Responsibility (CSR) standards, including compliance with laws and regulations, respect for human rights, working conditions, equal opportunities, health and safety accreditation, information security, fair trade, and corporate ethics.
- **Recruitment Policy** - We collaborate only with reputable, specific employment agencies for sourcing agency workers and validate the practices of any new agency before accepting their workers.

Our Values

Our corporate values on being collaborative, progressive, and confident in our capabilities set clear expectations for our employees' conduct. We persistently strive to uphold the highest standards of employee conduct and ethical behaviour, particularly when operating abroad and managing our supply chain.

Supplier Due Diligence

Codec carries out rigorous due diligence for potential new suppliers and regularly evaluates existing ones. We emphasize creating long-lasting relationships with suppliers while clarifying our expectations from business partners.

Raising Awareness

We have created awareness about modern slavery issues by disseminating pertinent information among our employees, covering:

- The Modern Slavery Act 2015's principles and its applicability to Codec;
- Methods for employers to identify and prevent slavery and human trafficking;
- Guidance for employees to report potential slavery or human trafficking issues within the organisation;
- Availability of external help, such as through the Modern Slavery Helpline.

Risk Evaluation and Management

While the nature of our work makes the risk of modern slavery low in our business, we maintain a high level of vigilance and consistently assess and manage the risk in our business and supply chains.

Assessing Anti-Slavery Policy Effectiveness

We evaluate the effectiveness of our Anti-Slavery Policy using appropriate key performance indicators, including audit frequency, supplier compliance levels, and feedback from our employees and suppliers.

Training

We deliver training on modern slavery and human trafficking to our staff to enhance their understanding of the risks within our supply chains and our business.

This statement has received approval from our Board of Directors and will be reviewed and updated annually.