

## EPTURA INTERNATIONAL LIMITED

### MODERN SLAVERY STATEMENT

FINANCIAL YEAR ENDED DECEMBER 31, 2025

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#### ABOUT EPTURA INTERNATIONAL LIMITED AND OUR COMMITMENT

Eptura International Limited forms part of the Eptura group of companies. Eptura is a global worktech company that provides software solutions for people, workplaces and assets. At Eptura we are committed to ensuring that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking both in our own organisation and in our supply chain.

#### ORGANISATION STRUCTURE, BUSINESS AND SUPPLY CHAINS

Eptura International Limited is the ultimate parent company of trading entities in Germany, France, Belgium, Singapore and India. Central functions (including finance, operations and legal) are generally provided from the UK and/or US.

Our business operates in two key segments: (i) Software-as-a-Service ("**SaaS**"), delivering software services via the internet; and (ii) providing hardware to enable the use of those software services.

For the financial year ended 31 December 2025, the turnover attributable to Eptura International Limited and its subsidiaries exceeded the threshold requiring publication of a modern slavery statement under section 54 of the Modern Slavery Act 2015 (the "**Act**").

During the financial year, the majority of this spend was with suppliers in the UK, USA, Europe and APAC. All spend commitments are made using written contracts.

Eptura's hardware manufacturing during the financial year was carried out by Active-PCB Limited (UK), Active Display Limited (UK) and Dynamic Precision (USA).

#### POLICIES RELATING TO MODERN SLAVERY AND HUMAN TRAFFICKING

Eptura maintains a number of policies which underpin its commitment to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. These include a supplier code of conduct which, amongst other things, addresses modern slavery risk. These policies are subject to periodic review.

#### DUE DILIGENCE PROCESS

As a predominantly SaaS-based business, Eptura's business model does not carry a high level of slavery risk compared to certain other sectors. Due diligence focuses on areas within its supply chain which present potential risk.

Due diligence measures include written contracts with suppliers, application of a supplier code of conduct, and monitoring of relevant external sources including the Global Slavery Index.

## **RISK ASSESSMENT AND MANAGEMENT**

The principal modern slavery risks relevant to Eptura relate to its supply chain, in particular hardware manufacturing. As a predominantly SaaS-based business with limited direct labour exposure, the inherent risk within its own operations is assessed as low.

No instances of slavery or human trafficking concerns were raised during the financial year ended 31 December 2025.

## **EFFECTIVENESS IN COMBATING MODERN SLAVERY AND HUMAN TRAFFICKING**

Eptura keeps its approach to identifying and preventing modern slavery under review and will take proportionate steps where appropriate to update its policies and procedures.

## **TRAINING**

Eptura ensures that relevant personnel are made aware of modern slavery risks and related policies.

## **PLANS FOR THE NEXT FINANCIAL YEAR**

We believe that the best approach to combat the risk of modern slavery is continuous improvement and vigilance both within the Eptura group and between Eptura and our suppliers. In FY26 we will undertake continual reviews of our policies and procedures to ensure they remain up-to-date and sufficient for the purposes of combatting modern slavery.

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended December 31, 2025 and has been approved by the board of Eptura International Limited.*



Kathie Jones  
Director