

Eagle UK Topco Limited

Modern Slavery Statement

Date	28 September 2026
Version	1.5
Document Classification	Public



Modern Slavery Statement

1 Scope

In accordance with section 54 of the Modern Slavery Act 2015 (the “Act”) this statement reflects the commitment of Eagle UK Topco Limited and its subsidiaries, which include the trading subsidiaries Eckoh UK Limited, Eckoh LLC, Syntec Limited and QX Consulting (individually and together, “Eckoh”) and those who work for and on behalf of Eckoh. Eckoh is committed to acting ethically and with integrity in all our business relationships to prevent modern slavery and human trafficking within its business and supply chain. This Statement is reviewed annually and describes the actions taken during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking within its business and supply chain.

2 Commitment

Eckoh is committed to ensuring there is no slavery, human trafficking and child labour taking place in its supply chain or in any part of its business. It complies with all applicable employment legislation relating to pre-employment checks that identify the right to work, employee terms and conditions, including pay, and Eckoh invests in supporting the health and wellbeing of its staff. We believe the risk of modern slavery in our supply chain is low, however, we are not complacent and will continue to focus on improving our procedures and policies to ensure that there is no modern slavery in Eckoh’s supply chain. We expect the same commitment from our suppliers. Contractors and business partners.

3 Organisational Structure

Eckoh is a global business, privately owned, with operations in the UK, US and increasingly in Europe and Asia Pacific. All new suppliers are reviewed centrally and there is a structured screening process, which facilitates good visibility of the standards upheld by Eckoh’s Suppliers in relation to the treatment of workers and potential risk of modern slavery and human trafficking. Violation by a supplier of its responsibilities in preventing modern slavery is likely to lead to the termination of the business relationship between the supplier and Eckoh.

4 Relevant policies

Eckoh operates the following policies that support its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations. The policies are:

- **Anti-Bribery and Corruption Policy:** Eckoh recognises potential links between bribery and corruption and modern slavery. The organisation has a robust Policy, which is communicated to its employees and associated persons (for example consultants and agency staff).
- **Whistleblowing Policy:** Eckoh encourages its employees and associated persons and business partners to report any concerns related to direct activities, or the supply chains of Eckoh. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Eckoh’s whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.
- **Recruitment policy:** Eckoh carries out background checks on all new employees whether permanent or temporary.

- **Employee code of conduct and values:** Eckoh's values make clear to employees the actions and behaviours expected of them when representing Eckoh. All new employees receive training on the Company values. Eckoh strives to maintain the highest standards of employee conduct and ethical behaviour when operating globally and managing its supply chain.

5 Training & Capacity building

Eckoh is committed to building awareness of modern slavery across its workforce. During the coming year we will introduce modern slavery awareness training for all employees, covering how to recognise the signs of modern slavery and human trafficking and how to report concerns through our Whistleblowing Policy. Employees involved in procurement, supplier onboarding and recruitment will receive additional guidance on assessing supplier risk and escalating concerns. Progress will be reported in our next statement.

6 Measuring effectiveness

Eckoh monitors the effectiveness of its approach by tracking completion of employee and supplier screening before engagement, the inclusion of anti-slavery provision in supplier contracts, completion of right-to-work and background checks for new starters, completion of staff training, and any concerns raised through our Whistleblowing channels and how they are resolved. These measures are reviewed annually alongside this statement.

7 Risk

Eckoh takes a zero-tolerance approach to any kind of modern slavery within its operations and supply chains. As a technology Company, we consider the risk of modern slavery existing within our business to be low. However, no sector or industry is risk-free and we are not complacent. In accordance with the Company's Whistleblowing policy, staff are encouraged to report concerns, using the appropriate reporting channels and management are expected to act upon them.

8 Board approval

This statement has been approved by the organisation's Board of Directors, who will review and update it annually.



Chrissie Herbert
CFO and Company Secretary
28 September 2026

Document History: Modern Slavery Statement

Version	Details	Document classification	Status	Date	Author
1.0	First Issue	Public	Final	21 Sept 2022	Chrissie Herbert
1.1	Annual Review	Public	Final	25 Oct 2023	Chrissie Herbert
1.2	Annual Review	Public	Final	24 April 2024	Chrissie Herbert
1.3	Annual Review – updated for change in ownership	Public	Final	6 August 2025	Chrissie Herbert
1.4	Annual Review – updated to cover Eagle UK Topco	Public	Final	29 July 2026	Chrissie Herbert
1.5	Periodic review to add sections on training and measuring effectiveness	Public	Final	28 Sept 2026	Chrissie Herbert