

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2023

This statement is made on behalf of Liikennevirta Oy and its UK subsidiary Virta Ltd (company number 12003239) (“**Virta**”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “**Act**”) and constitutes our slavery and human trafficking statement for the financial year ended 31 December 2023 (the “**reporting period**”).

This is the first statement made on behalf of Virta and sets out the steps that we continue to take to prevent modern slavery and human trafficking in our business and supply chains.

OUR STRUCTURE

Virta is a limited liability company incorporated in Helsinki, Finland (Business ID: FI25889862). Virta’s registered address is Energiakuja 3, 00180 Helsinki, Finland. Virta owns and controls several subsidiary companies, which are incorporated in Sweden, Germany, France, Romania, Singapore, and the UK.

Our UK subsidiary is headquartered in London.

OUR BUSINESS AND SUPPLY CHAIN

Virta was founded in 2013 and is a global electric vehicle (“**EV**”) charging platform provider. Virta’s digital platform connects all the key players in the electric vehicle ecosystem and provides services for the entire value chain. At the end of 2023, Virta had 226 employees worldwide, with 157 in Helsinki and 6 in the UK. 221 are full time employees, 5 are part-time employees. We employed one seasonal worker in Helsinki.

Our supply chains include software suppliers, EV charging infrastructure suppliers, IT infrastructure, equipment, consulting services and services connected with EV charging. We have longstanding relationships with our hardware and software suppliers.

OUR APPROACH

We have zero tolerance to slavery and human trafficking: Virta respects and supports the protection of internationally proclaimed human rights. We will not tolerate any violations of human rights within the organisation or among our suppliers, partners, customers, or other stakeholders.

Virta is committed to combating modern slavery and human trafficking in all its forms and we remain steadfast in our commitment to upholding the highest standards of ethical conduct and ensuring that all individuals involved in our operations are treated with dignity and respect. Whilst Virta is not aware of any modern slavery in its operations or supply chains, we recognize our responsibility to take a proactive stance against egregious violations of human rights and strive to ensure that our operations and supply chains are free from any form of exploitation.

To ensure all those in our supply chain comply with our values we require that our zero-tolerance approach is communicated to all suppliers, sub-contractors and business partners at the outset of our business relationship and that it is reinforced, as appropriate, thereafter.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We comply with all UK and Finnish employment legislation and where possible exceed requirements. Right to work documentation is checked and confirmed before any employment offer is made. All terms and conditions are shared prior to employment and policies are made available to all new staff on joining and then are available on our intranet. This includes whistleblowing, non-discrimination, harassment & bullying, health & safety, sustainability, anti-bribery and corruption, early intervention & early support model as well as diversity, equity & inclusion. These policies are regularly reviewed and updated as needed.

Whilst we do not have a modern slavery policy, our [Sustainability Policy](#), which applies to Virta, confirms our commitment to human rights and modern slavery, including the UN's Sustainable Development Goals 8 (Decent Work and Economic Growth) and 16 (Peace, Justice and Strong Institutions). We are in the process of updating our policies during the financial year ending 31 December 2024 to further take into account our commitment to human rights and modern slavery.

DUE DILIGENCE PROCESSES

Our commitment to eradicating modern slavery is reflected in the following actions and measures:

1. **Supply Chain Due Diligence:** We conduct due diligence on our supply chains to identify and assess any risks of modern slavery and human trafficking. This includes assessing the practices of our suppliers, subcontractors, and business partners to ensure they comply with relevant laws and regulations. For example, we are striving to assess as many of our suppliers as possible with EcoVadis. EcoVadis assessments give us insight into how our suppliers work with environmental, ethical, labour & human rights and procurement aspects of sustainability.
2. **Supplier Code of Conduct (SCoC):** We have developed and implemented a Supplier Code of Conduct that sets out our expectations regarding legal compliance, ethical business practices, labour standards and human rights, and environmental practices. We require all our active EV charging infrastructure suppliers to adhere to these standards and we strive to extend the SCoC to additional partners across our supply chain.
3. **Employee Training and Awareness:** In addition to Right to Work checks and established employment policies and practices, we provide training about Virta's core values and require all employees joining Virta to review, sign, and act according to our internal Code of Conduct. This does not specifically include modern slavery training. We encourage open communication and provide channels such as an anonymous [whistleblowing tool](#) for reporting any concerns or suspicions related to modern slavery or any other form of wrongdoing or breach of law. Our whistleblowing tool is publicly available and accessible to suppliers as well as our employees.

RISK ASSESSMENT AND MEASURING EFFECTIVENESS

As part of its latest materiality analysis, Virta has assessed risks and concluded that, as a software-focused company, the operational risk and risk from the supply chain are both low.

However, Virta evaluates risks that are indirectly controlled within its supply chain on a case-by-case basis, considering factors such as activity, field, and geographic location. The initial focus of risk assessments has been on hardware suppliers, where smaller components in the suppliers' products

might be sourced further down the value chain from sub-contractors. Virta uses EcoVadis assessments to identify risks and requires suppliers to adhere to Virta's SCoC.

Virta requires suppliers to regularly monitor their compliance with the Code and to inform Virta about any non-compliance. Should the supplier have significantly violated the Code, Virta is entitled to terminate the business relationship with the supplier with immediate effect.

FURTHER STEPS AND TARGETS

We will continue to keep under review our internal processes to identify what further steps can be taken to ensure that our obligations under the Act are met and that our policies and procedures are effectively implemented and complied with, so as to ensure that there is no slavery or human trafficking in any part of our business.

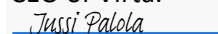
Some of the specific measures we will be progressing during the financial year ending 31 December 2024 include:

- Virta has previously set a target to assess all its active EV charging infrastructure suppliers via EcoVadis and have all of them sign the SCoC. As part of our continuous improvement approach, we aim to broaden the scope of suppliers being assessed in EcoVadis and have already requested assessment results from additional suppliers and will continue to do so.
- we will update our policies and procedures, including our Code of Conduct, to explicitly refer to expectations in relation to modern slavery.
- we will consider the training that is provided to our employees and how this might incorporate modern slavery training as appropriate.

We will review progress regularly and report in our next statement against the above.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Virta's slavery and human trafficking statement for the financial year ending 31 December 2023.

This Statement was approved on 28.8.2024 by the Board of Directors of Virta and is signed by the CEO of Virta.


Jussi Palola (Sep 23, 2024 16:20 GMT+3)

Jussi Palola
CEO
Virta






Modern Slavery Statement 28082024

Final Audit Report

2024-09-23

Created:	2024-09-23
By:	Mia Kotakorpi (mia.kotakorpi@virta.global)
Status:	Signed
Transaction ID:	CBJCHBCAABAAN2XXyEm_5wXEBPU49DjWdK5JI7AxgwTe

"Modern Slavery Statement 28082024" History

-  Document created by Mia Kotakorpi (mia.kotakorpi@virta.global)
2024-09-23 - 1:03:15 PM GMT- IP address: 91.155.164.111
-  Document emailed to Jussi Palola (jussi.palola@virta.global) for signature
2024-09-23 - 1:03:19 PM GMT
-  Email viewed by Jussi Palola (jussi.palola@virta.global)
2024-09-23 - 1:14:55 PM GMT- IP address: 104.28.131.31
-  Document e-signed by Jussi Palola (jussi.palola@virta.global)
Signature Date: 2024-09-23 - 1:20:49 PM GMT - Time Source: server- IP address: 194.136.103.98
-  Agreement completed.
2024-09-23 - 1:20:49 PM GMT