

SLAVERY AND HUMAN TRAFFICKING STATEMENT
FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2024

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 2024 (the “reporting period”).

This is the second 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 2024, Virta had 256 employees worldwide, with 158 in Helsinki and 7 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, services connected with EV charging and services connected with office management. We strive towards having longstanding relationships with our hardware, software and other suppliers. Virta also acquires services, mainly related to office management, in the countries where it operates in. Virta is constantly working on developing its due diligence in the supply chain to understand potential related risks. It is important to note that the business in which Virta operates is highly dynamic. Rapid changes may arise because of evolving trends or legislative developments.

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). In addition, our [Code Of Conduct](#) and Supplier Code of Conduct set the tone for both employees and suppliers. Policies are updated based on need based on a review of policies, that is conducted at least every third year. All policies are updated in cooperation with several stakeholders, e.g. the procurement team and management.

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 aim to evaluate as many of our suppliers as possible using an independent third-party tool. These assessments provide us with valuable insights into how our suppliers address environmental, ethical, labor and human rights, as well as 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. In addition, we give employees the opportunity to speak up about grievances via anonymous surveys. This does not specifically include modern slavery training. We encourage open communication and also 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

Virta has considered its sustainability risks in its double materiality analysis conducted during 2024. The materiality analysis is reviewed at least annually and updated if there have been significant changes in either the company's operating model or significant changes in the surrounding business environment. The materiality analysis is carried out by the sustainability department and approved by the management.

In the materiality analysis it was concluded that, as Virta is a soft-ware focused company, the human rights related can be considered risk is low. However, there are some human rights risks associated with the EV charging hardware further down the value chain. To identify and assess these risks, Virta uses an independent third-party tool. The tool is based on e.g. supplier questionnaires, scientific research and sector understanding. The 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 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.

Virta requires suppliers to regularly monitor their compliance with the Supplier Code of Conduct 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, 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:

- Continue developing the due diligence in supply chain
- We will update our policies and procedures, including our Supplier Code of Conduct and Code of Conduct, to explicitly refer to expectations in relation to modern slavery.

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 2024.

This Statement was approved on 17.06.2025 by the Board of Directors of Virta and is signed by the CEO of Virta.

Christian Girardeau

Christian Girardeau (Jul 3, 2025 13:31 GMT+2)

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CEO

Virta