

Modern Slavery Statement

Causeway Technologies: Transparency in Supply Chains Statement

For the financial year ending 31 December 2024

1. Introduction

- 1.1 Causeway Technologies is committed to preventing modern slavery and human trafficking in its business and supply chains, and those of its subsidiaries.
- 1.2 This statement is made by Causeway Software Holdings Limited, the parent company of the Causeway Technologies group, on behalf of the group, including the UK subsidiary, Causeway Technologies Limited (together "*Causeway Technologies*"), in accordance with the obligations of both those entities to make a Transparency in Supply Chains ("*TISC*") under s.54 of the Modern Slavery Act 2015 (the "*2015 Act*"). This statement sets out the steps taken in the last financial year to ensure slavery and human trafficking is not taking place in any part of Causeway Technologies' business or in any of its supply chains. To enable us to achieve this, Causeway has a Quality Management System (QMS), which includes defining and improving our internal processes to understand customer requirements and meet their expectations. This forms part of Causeway's Integrated Management System (IMS).

2. Our Business

- 2.1 Causeway Technologies is committed to preventing modern slavery and human trafficking in its business and supply chains, and those of its subsidiaries.
- 2.2 In 2024 Causeway acquired Buchanan Computing Ltd, a similar software business, providing traffic management systems into the UK public and private sector.
- 2.3 Causeway now operates through three core sites in the UK, one site in France, one site in Portugal and has a small engineering and support function in India, a very small support function in Australia, and a small sales and customer service team with an office in the US.

3. Our Supply Chains

- 3.1 As a software development business, our direct supply chains are relatively limited as our products and services are created by our development teams. The due diligence process of suppliers is currently limited to product and services, financial, information security, and BCP (as part of our ISO27001, SOC2, ISO9001 and ISO22301 systems).

- 3.2 We are often required to agree to supplier standard terms and conditions, without substantive opportunity for negotiation. Our hosting partners are Google, Amazon, Microsoft and Node 4. Microsoft, Dell, Salesforce, Atlassian and Vodafone are our main IT and communications suppliers. We also have partners from whom we licence software for resale as part of Causeway products (Infor and Techsoft who are large US software providers), and a number of specialist software and technology suppliers.
- 3.3 Part of our business also involves provision of a biometric time and attendance system, including provision of electronic tablets. Tablets are sourced from one supplier in France and are manufactured in China. We also supply some limited hardware where parts are mainly sourced online. The rest of our suppliers are standard office business suppliers. Cleaning contractors clean our UK office locations. Our French and Portuguese office contracts a cleaning contractor directly.
- 3.4 To date, we have not identified or been made aware of any modern slavery issues with the suppliers we have engaged or their supply chains.

4. Our Policies and Contractual Controls

Code of Conduct

- 4.1 In 2024, we updated our Code of Conduct Policy. The Code applies to all employees across the business. The Code is intended to ensure that Causeway Technologies upholds the highest standards in the conduct of its business, and includes a requirement that everyone is treated fairly. It also sets out principles of Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership. Failure to follow the Code of Conduct is a disciplinary matter.

Whistleblowing Policy

- 4.2 Causeway Technologies continues to have a Whistleblowing Policy in place. The Whistleblowing Policy encourages reporting of concerns including in relation to potential criminal offences, compliance with legal obligations and endangering of an individual's health and safety. The Whistleblowing Policy specifically emphasises matters concerned with the health, safety and welfare of those on our premises (whether employees, contract staff or visitors).

5. Risk Assessment

- 5.1 Causeway Technologies is not aware of any slavery or human trafficking issues within its business or supply chains. In the last financial year, no potential issues of this type have been identified or reported through internal reporting channels, audit processes, whistleblowing or otherwise. Causeway Technologies has not received any information indicating that there may be any such issues with any of its suppliers or their supply chains.
- 5.2 As noted above, our main activities are concerned with software development and the majority of our employees are in high skilled roles. This includes our India team which is composed of software engineers and software support staff. Aside from the small team in

India, small teams in the US and Australia, our footprint is mainly in the UK, Portugal and France, all of which are lower risk countries for modern slavery, particularly in our sector.

5.3 On this basis, we consider the risk of slavery or human trafficking in our business and supply chains to be low. However, we recognise that business operations such as sourcing of electronic tablets, hardware and the electrical equipment used by our teams, as well as cleaners for our offices, are types of activity that can give rise to higher risks of modern slavery and human trafficking.

5.4 Causeway is committed to ensuring there is no modern slavery or human trafficking in our business or supply chains. As such, should any potential issue be identified, Causeway will act swiftly to investigate and, where appropriate, take responsive actions.

5.5 We continue to maintain the Modern Slavery Statement and included Modern Slavery risk within our recent acquisition. We are continually improving and refining our approach to supplier due diligence and our accounts payable system is able to identify third party risks in relation countries subject to sanctions, further reducing risk. We have not identified a need for further training to our employees, but we will continue to monitor this over the coming year. Causeway will continue to proactively consider what additional steps, if any, it should take to further guard against the risks of modern slavery.

6. Approval of this Statement

6.1 This statement is made for the financial year ending 31 December 2024. This statement was approved by the Causeway Software Holdings Limited and Causeway Technologies Limited management board on 31 May 2025.

6.2 This statement is signed by Paul Devlin on 31 May 2025.

