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### 1. Introduction

Odevo UK Limited is committed to conducting business with the highest standards of ethics, integrity, and social responsibility. As part of the Odevo Group, we aim to lead by example in the fight against modern slavery and human trafficking. We understand that modern slavery is a serious global issue, affecting many industries, and we are committed to ensuring that it does not occur within our business or supply chains.

This is our **second** Modern Slavery Statement and reflects our efforts and commitment to prevent, detect, and respond to modern slavery, human trafficking, and other forms of exploitation across all our operations. We recognise the importance of transparent reporting and continuous improvement and will strive to enhance our efforts in line with evolving best practices.

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### 2. Structure of Odevo Group and Scope of this Statement

The Odevo Group is a global leader in property management and residential services, with operations in Finland, Sweden, Germany, the UK, and the US. Odevo UK Limited encompasses the following subsidiaries:

- R&R Residential Management Ltd
- Premier Estates Limited
- Ottimo Property Services Limited
- Vegner Group Limited
- Pinnacle Property Management Ltd
- Trinity Property Group Limited
- Highline Solicitors Limited
- Alexander Bonhill Limited
- CoDwellers.com Ltd
- Ginger Energy Limited
- SRVO Property Limited



This statement applies to all employees, contractors, subsidiaries, and suppliers of Odevo UK Limited and its affiliates. It covers all entities operating within the United Kingdom, as well as any suppliers or partners globally who provide goods or services to the group.

### 3. Our Commitment to Preventing Modern Slavery

Odevo UK Limited has a zero-tolerance approach to modern slavery and human trafficking. We are fully committed to ensuring that modern slavery, forced labour, and human trafficking do not exist within our operations or supply chains. Our commitment is in line with the **Modern Slavery Act 2015**, and we continually strive to improve our internal processes and supplier relationships to prevent any potential violations.

To uphold this commitment, we will:

- Ensure strict compliance with all applicable **modern slavery laws** across the jurisdictions in which we operate.
- Identify, assess, and address any risks related to modern slavery within our operations and supply chain.
- Actively collaborate with our suppliers and business partners to raise awareness and foster ethical practices.
- Continue to evolve our practices in line with emerging standards, regulations, and stakeholder expectations.

### 4. Governance and Accountability

The **Board of Directors** at Odevo UK Limited is ultimately responsible for ensuring the effectiveness of this Modern Slavery Statement and compliance with all relevant laws. The **Odevo UK Group CEO** oversees its implementation, while senior leadership teams within each subsidiary are accountable for ensuring adherence to this policy across all operations.

Our key personnel involved in combating modern slavery include:

- **The Group CEO:** Responsible for the overall implementation and strategy for modern slavery compliance.

- **The Group General Counsel:** Overseeing legal compliance and addressing any breaches of the Modern Slavery Act or related policies.
- **HR and Procurement Directors:** Leading the development of staff training programs and managing supplier engagement to ensure compliance with the Supplier Code of Conduct.

Odevo UK Limited's Modern Slavery Statement will be reviewed annually and updated as required. We will ensure that any significant changes to our practices, operations, or supply chains are reflected in future updates.

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## 5. Our Supply Chain and Supplier Relationships

Our supply chains span multiple regions and industries, including office services and property management services. We are committed to partnering with suppliers who share our values and ethics and who actively work to combat modern slavery and human trafficking in their own operations.

As part of our supplier due diligence, we require all suppliers to adhere to our **Supplier Code of Conduct**, which outlines specific expectations regarding compliance with labour laws, ethical practices, and human rights. This Code mandates that:

- **Suppliers must avoid any form of forced or child labour.**
- **Suppliers must pay workers fairly** and comply with all regulations regarding working hours and wages.
- **Suppliers are required to establish internal mechanisms** to monitor their own supply chains for signs of modern slavery, forced labour, and human trafficking.

We reserve the right to audit and assess suppliers' compliance with our Supplier Code of Conduct, and any failure to comply could result in corrective actions, including the **termination of the business relationship**.

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## 6. Risk Assessments and Due Diligence

Odevo UK Limited carries out **regular risk assessments** to identify potential areas of concern for modern slavery within our operations and supply chain. These assessments are part of a broader **due diligence process** designed to ensure that modern slavery risks are effectively mitigated.

Our risk assessment processes include:

- **Supplier risk screening:** Identifying high-risk suppliers and regions where modern slavery is more likely to occur.
- **Due diligence checks:** Reviewing suppliers' policies and practices to ensure compliance with modern slavery laws and our Supplier Code of Conduct.
- **Corrective actions:** Establishing clear protocols for addressing any non-compliance identified during assessments, including working with suppliers to resolve issues.

We are also in the process of developing a **double materiality assessment** as part of our **CSRD preparations**, which will evaluate the financial and social impact of human rights issues, including modern slavery.

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## 7. Training and Awareness

We are committed to ensuring that all employees understand the signs of modern slavery and human trafficking and are equipped to report concerns. We will:

- Provide mandatory **training on modern slavery and human trafficking** as part of the induction process for all new employees.
  - Offer **refresher training** annually, or as needed, to ensure that our staff remains vigilant in recognising and reporting any concerns related to modern slavery.
  - Implement **training for suppliers** to ensure they understand their responsibilities under the Supplier Code of Conduct and are able to identify and address risks within their own operations and supply chains.
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## 8. Reporting Mechanisms and Whistleblowing

Odevo UK Limited encourages all employees, contractors, suppliers, and other stakeholders to report any concerns related to modern slavery, human trafficking, or unethical practices. We provide the following channels for reporting:

- **Whistleblowing Policy:** We have established a **confidential reporting mechanism** for whistleblowers, ensuring anonymity and protection from retaliation.
- **Direct Reporting:** Employees and contractors are encouraged to report concerns directly to their manager, HR, or the Group General Counsel if they suspect or discover any instance of modern slavery or human trafficking.

We ensure that all reports are taken seriously and investigated promptly. If necessary, we will engage independent third parties to conduct investigations, particularly if allegations are complex or cross-border in nature.

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## 9. Consequences of Non-Compliance

Failure to comply with this Modern Slavery Statement may lead to serious consequences, including:

- **Termination of business relationships** with suppliers and contractors found to be in violation of the Code of Conduct.
- **Disciplinary actions** for employees who breach internal policies related to modern slavery, including termination of employment in severe cases.

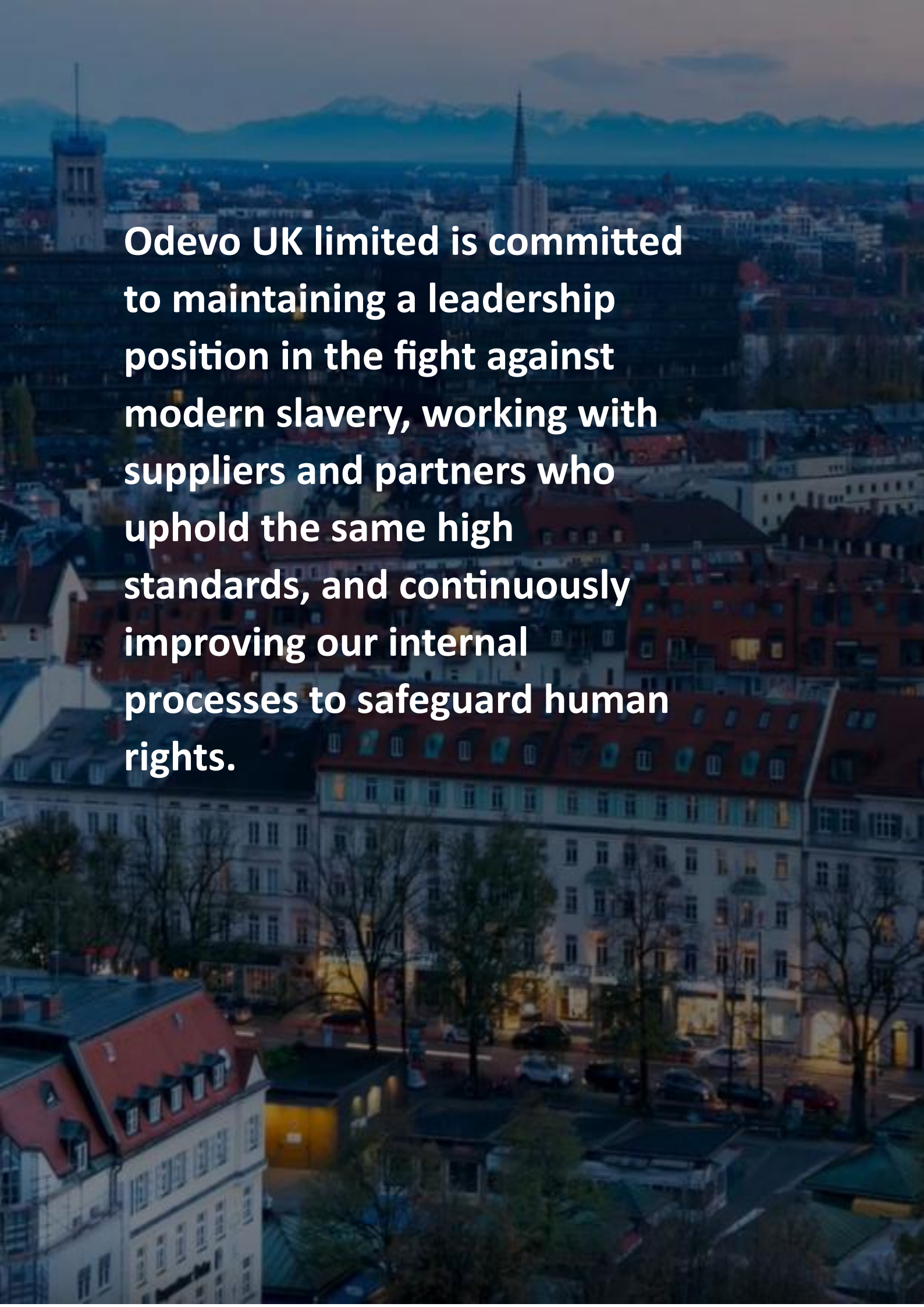
Odevo UK Limited is committed to taking immediate and appropriate action in response to any breach of this policy, ensuring that any instances of modern slavery are addressed swiftly and thoroughly.

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## **10. Approval and Review**

This Modern Slavery Statement was approved by the **Board of Odevo UK Limited** on **10 June 2025** and will be reviewed annually to ensure its continued effectiveness and alignment with best practices.

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An aerial photograph of a city at dusk or dawn. The foreground shows several large, multi-story buildings with red-tiled roofs and many windows. Some windows are lit up, suggesting evening. In the background, a range of mountains is visible under a hazy sky. The overall tone is blue and slightly dim, typical of twilight. The text is overlaid on the left side of the image.

**Odevo UK limited is committed to maintaining a leadership position in the fight against modern slavery, working with suppliers and partners who uphold the same high standards, and continuously improving our internal processes to safeguard human rights.**