

# Modern Slavery Statement 2023

## The Voi Technology Group

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the Voi Technology Group's position and the steps that have, and are, being taken to prevent and reduce the risk of modern slavery and human trafficking in Voi Technology Group's business and supply chains. This statement covers the financial year ending 31 December 2023.

## Our Modern Day Slavery Statement

All businesses have a responsibility to prevent any form of modern day slavery in their own operations and their entire supply chains. The Voi Technology Group deplores and will work to eliminate any type of human rights abuse, such as forced labour, child labour, human trafficking, slavery, and servitude. This goes for our own business and at any level in our supply chain, including those of our suppliers and business partners.

## Structure, business & supply chain

Voi Technology UK imports and rents shared forms of micromobility (e-bikes and e-scooters) and is a member of the Voi Technology Group. The Voi Technology Group is a private company headquartered in Stockholm, Sweden. The Voi Technology Group is Europe's leading micromobility operator, with operations in 12 countries across Europe. Voi Technology UK is a multi-site enterprise with +150 employees spread across multiple offices and warehouses across the country.

The Voi Technology Group employs +900 people worldwide and has suppliers in 30 countries. The major e-scooter and e-bike production facilities are located in China and Italy.

In 2023, Voi Technology Group had around ~70 Tier 1 suppliers. We define Tier 1 suppliers as those over a certain spend, based in high-risk countries or that are material to our business. Between 2021 and 2023, purchases were made from suppliers in EMEA (84%), Asia-Pacific (15%) and North America (1%). The supply chain is complex and there are in general several tiers of suppliers between the manufacturing entities and the supplier of raw materials.

## Policies relating to modern slavery

### **Voi Technology Code of Conduct and Business Ethics**

Voi Technology's [Code of Conduct and Business Ethics](#) ("the Code") provides the foundational standards and expectations for all aspects of our business and applies to all of our employees and operations.

The Code makes clear that the Voi Technology Group is "committed to respecting internationally recognised human rights" and complies with applicable laws and agreements on employment conditions such as working and resting hours, compensation and benefits. The Code further sets out that Voi Technology does not tolerate any forms of modern slavery, including forced labour or human trafficking, respects children's rights and does not use child labour.

The Code provides guidance on how to report any suspicions, either anonymously or by name. All reports are reviewed and investigated and necessary action will be taken.

### **Voi Technology Supplier Code of Conduct**

Modern slavery and human trafficking issues are also addressed in Voi Technology Group's [Supplier Code of Conduct](#) ("the Supplier Code"), published on our website. The Voi Technology Group is committed to corporate sustainability and ethical business practices, with an approach to responsible business that is based on the [Ten Principles of the UN Global Compact](#), of which Voi Technology is a signatory.

The Voi Technology Group is committed to upholding the human rights of workers, and treating them with dignity and respect as stated in the United Nations' Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, the Ten Principles of the UN Global Compact and the Principles of the International Labour Organisation. This applies to all workers including temporary, migrant, student, contract, and direct employees.

- *Forced labour.* Suppliers shall not use or work with others that use forced, bonded or indentured labour, involuntary or exploitative prison labour, slavery or trafficking of persons.
- *Child labour.* Suppliers shall not use child labour. Under no circumstances shall work be offered to a person below the age of 15 years old or younger than the country's legal minimum age, if above 15. Any work provided to persons aged 15-17 should not harm their education, health or development.
- *Working hours.* Suppliers must respect their country's laws regarding working hours, overtime, breaks, weekly rest periods, and applicable leave. Voi supports the requirements of the International Labour Organization (ILO) and we encourage our business partners to adhere to and respect the relevant ILO standards on working time.
- *Compensation.* Suppliers may not pay their workers wages and benefits less than is required by applicable law or collective labour agreement, including overtime compensation. Information about wages and benefits must be available to all workers, in accordance with applicable laws.
- *Terms of work & compliance.* Suppliers must comply with all local labour laws in the countries where it operates, including those relating to minimum wages, overtime hours and legally mandated benefits.
- *Anti-discrimination & equity.* Suppliers must maintain a fair and equitable workplace which is free from harassment and unlawful discrimination including discrimination based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation or opinion, trade union membership, protected genetic information, social origin, marital status or any other personal characteristics.
- *Respectful working environment free from harassment.* Suppliers must treat all workers with respect and ensure they are not subject to any form of harassment, including verbal, physical, sexual or psychological.

- *Freedom of association and collective bargaining.* Suppliers must respect their workers' ability to organise themselves to strengthen their voice and engage in collective bargaining in accordance with local laws and regulations.
- *Raising grievances.* Suppliers must ensure that workers can speak with management regarding their working conditions, individually or collectively, without any risk of discrimination, retaliation, threats or harassment.
- *Communication of rights.* Suppliers must ensure they provide workers with contracts containing working conditions and ensure workers are aware of their rights in a language they understand.
- *Responsible Mining.* Suppliers sourcing conflict minerals are to conduct third-party audits and report on the origins and social and environmental practices of their suppliers in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

## Supply Chain Due Diligence

As a business, the Voi Technology Group has taken steps to ensure that modern slavery and human trafficking do not take place in our business and in the business of our suppliers. It is the responsibility of every Voi employee in contact with a supplier to ensure that our suppliers are aware of our terms and conditions and our Supplier Code of Conduct.

When conducting supply chain due diligence, we focus on countries identified by the UK as Human Rights priority countries.

### **Supplier Code of Conduct:**

We expect our suppliers and their employees, agents and contractors to adopt the principles laid out in our Supplier Code. Suppliers are expected to report on progress and non-compliance to the Supplier Code in relation to their activities, facilities and operations. Suppliers are responsible for ensuring compliance with the Supplier Code by all of its suppliers, vendors, agents and contractors.

As of Q4 2023, ~80% of our Tier 1 suppliers had signed the Supplier Code (up from ~50% in 2022), including 100% of our key hardware suppliers. We are working to have all Tier 1 suppliers sign the Supplier Code going forward.

### **Supplier self-assessments:**

We are currently in the process of ensuring that all Tier 1 suppliers conduct a self-assessment questionnaire against the requirements set out in the Supplier Code and share the results with the Voi Technology Group. The results of the self-assessment form the basis for the decision to do business with the relevant supplier or not.

### **Risk Management Framework:**

We have implemented a Risk Management Framework to assess the necessary course of action towards suppliers based on the answers they provide in our Supplier Self-Assessment Questionnaire. If minor administrative breaches are found, we will work with the supplier to amend the breach. In case of a major breach, such as the use of or wilful blindness towards the use of forced or child labour, Voi would find a new supplier. The Risk Management Framework includes human rights and modern slavery risks.

### **Whistleblowing system:**

We have a whistleblowing policy and provide tools by which employees can choose to report either by name or anonymously, any concerns about serious wrongdoing or risks affecting individuals, our company, our supply chain, society or the environment. No employee will suffer any disadvantage or retaliation as a result of having reported a concern in good faith.

## Staff training

During 2023, the Voi Technology Group continued to strengthen its commitment to mitigate any modern slavery and human trafficking risks by further enhancing the capacities of all managers, ensuring their adeptness in identifying and addressing any associated risks. Our Human Rights training is available on Voi's intranet as well as Voi's e-learning platform and is mandatory

for all people managers, and employees who have not yet completed the training are reminded to do so.

The training focuses on raising awareness and highlighting accountability regarding human rights risks, including but not limited to modern slavery and human trafficking. As of Q4 2023, 98% of employees had completed our Human Rights training.

This statement was approved by Fredrik Hjelm, the Chief Executive Officer and the Board of Directors of the Voi Technology Group in June 2024.



**Fredrik Hjelm**

CEO and Co-Founder

Voi Technology

# Verification

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## Document

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