

## EYYA GROUP LTD

# Modern Slavery and Human Trafficking Statement

## 1. Introduction

Although EYYA GROUP LTD is not currently required to publish a statement under Section 54 of the Modern Slavery Act 2015, the company voluntarily adopts the principles of the Act as part of its commitment to ethical business conduct, responsible innovation and transparent supply chain practices.

## 2. Organisation Structure, Business and Supply Chains

EYYA GROUP LTD is a UK-based technology and innovation company specialising in Artificial Intelligence (AI), Internet of Things (IoT), geospatial analytics, digital twins and smart infrastructure solutions across sectors including rail, transport, urban mobility and smart cities.

Our activities include:

- AI-enabled transport and infrastructure monitoring
- IoT and sensor-based systems
- Digital twin and geospatial solutions
- Software development and cloud-based analytics
- Research and innovation projects
- Consultancy and systems integration
- Collaborative delivery with academic, public and private sector partners

EYYA primarily operates within the United Kingdom, working with local authorities, transport operators, technology providers, universities and commercial suppliers.

Our supply chains include:

- Technology hardware suppliers
- IoT and sensor manufacturers
- Cloud and software providers
- Professional services suppliers
- Recruitment and specialist contractors

- Facilities and operational services
- Marketing and communications suppliers

While the majority of our supply chain is UK-based or sourced through recognised global technology providers, we acknowledge that risks relating to labour exploitation and unethical practices can still exist within wider international manufacturing and technology supply chains.

### 3. Policies in Relation to Modern Slavery and Human Trafficking

EYYA is committed to maintaining policies and procedures that support ethical business practices and reduce the risk of modern slavery.

Our approach is supported by the following principles:

- Zero tolerance towards modern slavery and human trafficking
- Ethical procurement and supplier engagement
- Compliance with UK employment law and human rights legislation
- Fair recruitment and employment practices
- Equality, diversity and inclusion
- Responsible use of AI and technology
- Whistleblowing and reporting mechanisms

EYYA seeks to work with suppliers, contractors and partners that share our commitment to ethical labour standards and responsible business conduct.

We reserve the right to review or terminate relationships with organisations that fail to meet acceptable standards relating to labour practices, exploitation or human rights.

### 4. Due Diligence Processes

EYYA applies proportionate due diligence processes when selecting suppliers, contractors and delivery partners.

These processes may include:

- Supplier and contractor assessments
- Reviewing supplier policies and ethical standards
- Assessing supply chain risks based on sector and geography
- Preference for reputable and compliant suppliers
- Use of contracts and agreements containing compliance expectations
- Monitoring supplier performance and conduct where appropriate

As a growing SME, EYYA recognises that its due diligence processes will continue to evolve as the business scales and supply chains expand.

Where higher-risk procurement activities are identified, additional scrutiny may be applied.

## 5. Risk Assessment and Risk Management

EYYA recognises that modern slavery risks can exist in global technology manufacturing, electronics supply chains, outsourced labour and subcontracted services.

At present, EYYA considers its direct operational risk to be relatively low due to:

- A predominantly UK-based workforce and operational model
- Engagement with professional and technology-based suppliers
- Limited use of low-skilled or high-risk labour sectors
- Use of recognised suppliers and established procurement channels

However, we recognise that indirect risks may exist within:

- Hardware and electronics manufacturing
- International supply chains
- Third-party subcontracting arrangements
- Temporary or contingent labour services

To mitigate these risks, EYYA aims to:

- Increase awareness of modern slavery risks internally
- Continue reviewing supplier relationships
- Encourage ethical procurement practices
- Embed responsible business standards within future growth activities

## 6. Key Performance Indicators (KPIs) and Effectiveness

EYYA is committed to continuously improving its approach to identifying and mitigating modern slavery risks.

We monitor the effectiveness of our approach through:

- Ongoing supplier engagement and review
- Monitoring of ethical and compliance concerns
- Internal awareness and governance processes
- Review of procurement and onboarding practices
- Assessment of reported incidents or concerns

At the date of this statement:

- EYYA has not identified any instances of modern slavery within its direct operations.
- No formal reports relating to modern slavery or human trafficking have been raised through company channels.

As the business grows, EYYA intends to further strengthen supplier due diligence, governance and reporting measures.

## 7. Training and Awareness

EYYA recognises the importance of raising awareness of modern slavery risks among employees, contractors and management.

The company aims to:

- Promote awareness of modern slavery and ethical labour practices
- Encourage employees and partners to report concerns
- Embed responsible business principles within company culture
- Provide guidance to relevant staff involved in procurement, partnerships and supplier engagement

As EYYA expands, the company will review opportunities to introduce additional formal training and awareness activities relating to modern slavery compliance.

## 8. Approval

This statement has been approved by the Directors of EYYA GROUP LTD and will be reviewed annually.

Approved by:

Dr Niazy Kioufi  
Chief Executive Officer  
EYYA GROUP LTD

Date: 24<sup>th</sup> May 2026