

## Modern Slavery Policy Statement

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### Purpose

EFA Engineering Limited (EFA) has a zero-tolerance approach to modern slavery. This policy covers our requirements and responsibilities relating to anti-slavery.

Those working for or on behalf of EFA, hereafter referred to as staff, are issued this policy and must adhere to it and our procedures within our management system that are relevant to their role and responsibilities. Compliance with this Policy is mandatory.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

EFA are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect our suppliers to hold their suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

### Compliance with the policy

All staff must read, understand, and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. Staff must notify their line manager or a company Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If anyone believes or suspects a breach of this policy has occurred or that it may occur, they must notify their line manager or company Director.

Staff should note that where appropriate, and with the welfare and safety of local workers as a priority, EFA will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains. If anyone is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they must raise it with their line manager or company Director.

EFA aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. EFA are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If anyone believes that they have suffered any such treatment, they should inform their line manager immediately.

### **Communication and awareness of this policy**

Briefing of this policy, and on the risk EFA business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and staff. Further training will be given where needed.

EFA's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **Breaches to this policy**

Any staff who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. EFA may terminate the relationship with other individuals and organisations working on our behalf if they breach this policy. This Modern (Anti) Slavery Policy and Statement is intended for businesses in all countries, especially the United Kingdom.

### **Responsibility**

The Managing Director is responsible for the implementation, review, and maintenance of this policy.

All staff are responsible for adhering to this policy and ensuring they are compliant with the stipulated requirements within this policy.

This is a statement of policy only and does not form part of any contract of employment/agreement/engagement. This policy is an integral part of our Business Management System and is subject to an annual review and revision when necessary.

Alex Edwards  
Managing Director

