

MODERN SLAVERY POLICY

Introduction

This Policy is made in accordance with Section 54 of the Modern Slavery Act 2015 and sets out the steps that EFT Group Ltd. has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. EFT Group Ltd operates a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all our business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Organisation Structure

The organisation structure of the EFT Group comprises of EFT Systems Ltd. & EFT Construction Ltd. The Group is controlled by the Board of Directors. The EFT Group Head Office is located in Southport. The Group is predominantly involved in the provision for the Fire, Security, Electrical and Construction industry.

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Scope of our procurement activities:

- Our procurement activities take place in England; and our contractors and suppliers are predominantly UK and EU based.
- We utilise a sub-contractor assessment process to ensure that all contracted suppliers of labour to ourselves fully comply with the current Modern Slavery Act 2015 and are transparent, accountable and auditable; and are free from ethical ambiguities. Once a sub-contractor is approved there will be a set duration that they remain approved subject to on-going compliance checks.

Procurement and tender process improvements:

- Existing tender documentation includes the mandatory exclusion of any bidder who has been convicted of an offence under the Modern Slavery Act 2015.

Policy

EFT Group Ltd does not permit, condone or otherwise accept any form of slavery and/or human trafficking (as defined in the Modern Slavery Act 2015) either by its employees, sub-contractors, clients, partners or any other organisation, entity, body, business or individual with whom EFT Group Ltd. engages or does business (“Associated Party”).

EFT Group Ltd is committed to preventing any form of slavery and/or human trafficking in the execution of its activities and to ensure that its associated parties are free from any form of slavery and/or human trafficking.

In the event that EFT Group Ltd. suspects any form of slavery and human trafficking by an associated party, EFT Group Ltd. reserves the right to: report such suspicions; provide appropriate information to the relevant authorities; and to suspend or terminate any associated engagement, business arrangement or contract.

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Each associated party is required to: put in place suitable management policies/systems for ensuring compliance with the Policy; extend the principles set out in this Policy to those engaged or acting on the associated party's behalf, including contractors; and to permit EFT Group Ltd. to assess and audit (when required) to confirm compliance with the Policy, including making records available to EFT Group Ltd. to demonstrate compliance with the Policy.

Supply chain and business due diligence

In order to ensure that no slavery or human trafficking is taking place within its supply chain, EFT Group Ltd. has:

- Included an acceptance condition in the EFT Group Ltd. sub-contractor assessment questionnaire, including a mandatory rejection of any contractor who has been convicted of an offence under the Modern Slavery Act 2015.
- Developed a Modern Slavery Act 2015 supply chain feedback form to ensure that all suppliers comply with current law and legislation.
- Developed a procedure on suppliers and maintains an approved supplier list, we conduct due diligence on all suppliers before allowing them to become an approved supplier. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offences relating to modern slavery and on-site audits which include a review of working conditions (required only when there is reasonable doubt regarding a supplier's compliance to the Modern Slavery Act 2015). Our anti-slavery Policy forms part of our approval process with all suppliers and they are required to confirm that no part of their business operations contradicts this Policy.

In addition to the above, as part of our approved supplier procedure, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) they pay their employees at least the national minimum wage / national living wage (as appropriate).
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their own country of operations.
5. We may terminate the approval at any time should any instance of modern slavery come to light.
6. Conduct regular assessments and audits when required; on members of our supply chain to ensure continued compliance.

Our High-risk Areas

Suppliers and sub-contractors: there may be a risk of slavery and/or human trafficking through organisations with whom EFT Group Ltd. contracts for the supply of products or services, or through organisations with whom EFT Group Ltd. subcontracts work to or partners with.

The appointment of suppliers and subcontractors is subject to careful due diligence to ensure that there is no perceivable risk of slavery and/or human trafficking. EFT Group Ltd. engages only with reputable suppliers or parties that do not engage in any form of slavery and/or human trafficking.

All such parties are also expected to adhere to EFT Group Ltd. Business Conduct Principles, which is incorporated into the process for being appointed as such and/or the relevant contractual relationship. In the event that EFT Group Ltd. contracts with suppliers or subcontractors outside of the United Kingdom, it shall assess the supplier/sub-contractor and the relevant geographic area on a case by case basis, undertaking any necessary due diligence in accordance with the paragraph below.

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EFT Group Ltd. does not permit its suppliers to subcontract work or to supply products from any third party, save where EFT Group Ltd. prior permission is first obtained. In such a situation, EFT Group Ltd. would undertake its own due diligence on that third party and seek to ensure that the supplier also undertakes adequate due diligence to ensure that there is no risk of slavery and/or human trafficking. The EFT Group Ltd. Board of Directors is responsible for ownership of this Statement and Policy, including ensuring that it is up to date. The EFT Group Ltd. Compliance Manager is responsible for any compliance matters set out in this Statement and Policy, for ensuring due diligence and for undertaking audits.

Training

We regularly conduct training for our procurement/buying teams in the form of a toolbox talk so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

The Policy and Statement are readily available on the internal office server, online portal and forms part of the Craftsman's Handbook and is included as part of induction to EFT Group Ltd.

Annual reminders of the Statement and Policy ensure all staff within EFT Group Ltd. are familiar with the Policy.

EFT Group Ltd.'s Effectiveness

The effectiveness of ensuring that slavery and human trafficking is not taking place in EFT Group Ltd.'s business or supply chains shall be assessed by application of the following key performance indicators:

- To raise awareness of slavery and human trafficking by including this Policy and Statement by publishing it on the internal servers, external portals and craftsman's handbooks.
- Require all staff that inducts new employees into the business to introduce employees to the Statement and Policy and for the new staff to sign a declaration of adherence to the Policy.
- To maintain a register of approved suppliers that provides clear indication of their adherence to this Policy.
- Annual review of all existing supply chains.

Signed on behalf of the Board of Directors:



Adam Watts

Position: **CEO**

Date: **01/01/2020**