Modern Slavery & Human Trafficking Statement

Introduction

Efficio Global Consulting Limited ("Efficio") and its subsidiary companies are committed to protecting its organisation and those people at risk from exposure to slavery or people trafficking in its supply chain, both via directly employed staff and staff working on its behalf via third party vendors.

This Statement sets out the steps Efficio has taken to review and address any risk of slavery and human trafficking related to its business. This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Efficio's slavery and human trafficking statement for the financial year ending 30 June 2024.

Organisational Structure and Background

Efficio, acting via its subsidiary companies, provides procurement and supply chain consultancy services to our clients around the world.

Efficio operates its business through various subsidiaries, which are wholly owned by Efficio (either directly or indirectly via other Efficio subsidiaries). It has a well-developed system of internal authorities and policies within the group. Efficio and its subsidiaries employ approximately 1200 people across three continents. Our four main trading regions are the UK, Europe, Middle East and America. Our headquarters are in London and we have offices in Copenhagen, Düsseldorf, Geneva, Stockholm, Milan, New York, Chicago, Paris, Toronto, Dubai, Riyadh and Abu Dhabi.

Efficio has a global annual turnover in excess of £36m and is therefore subject to the requirements of the Modern Slavery Act 2015.

Our Employees

Our employees are all provided with a written contract of employment. Efficio has adopted various policies, including equal opportunities, whistleblowing and anti- corruption & bribery policies, and takes its responsibility for implementing such policies seriously. Its equal opportunities and anti- corruption & bribery policies are applicable to all directors, officers, agency workers, seconded workers, agents, contractors, external consultants, third-party representatives, or any other person associated with Efficio.

Efficio employees play a key role in maintaining high standards and its existing policies give a clear understanding of Efficio's approach to professional and ethical standards. Each employee and, where applicable, all other individuals covered by Efficio's policies, has a personal responsibility to review Efficio's policies and procedures, as well as to ensure that they fully understand our obligations and the consequences associated with any breach of those obligations. From FY25, every employee at Efficio will undertake modern slavery awareness training upon employment. Employees are encouraged to report any concerns regarding modern slavery without fear of retaliation. Reports can be made to their line manager, our General Counsel or senior leadership team, or through our confidential whistleblowing mechanism. All reports are investigated thoroughly and appropriate actions are taken.

Our board are responsible for ensuring implementation and adherence to this policy, and maintaining compliance with legislation. Our employees are responsible for participating in the training modules provided via our Efficio Academy learning platform, of maintaining awareness of what constitutes modern slavery and our zero-tolerance approach to the concept, and for reporting any concerns promptly.

Our Third-Party Supply Chains

Each year Efficio's subsidiary companies' contract with external vendors in respect of goods and services. The majority of such contracts are in relation to IT and professional services, mainly with corporations or contractors based in the UK, Europe or America. Spend commitments are made using written contracts. Efficio does not use cash payments for services.

Most of our manufactured goods (such as IT equipment) are purchased from large corporations who have adopted their own supply chain principles and standards.

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We are not currently aware of any forced labour or child labour within our supply chain. However, we will address any such potential risks, where identified, as appropriate.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Given the nature of Efficio's business we believe the risk of modern slavery or trafficking in Efficio's supply chain is low compared with businesses operating in other sectors. Nevertheless, our anti- slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Next Steps

In light of the Modern Slavery Act, Efficio will continue to review the risk of modern slavery in our supply chain (both as regards purchasing goods and provision of services). We will assess our interaction with suppliers and review our procedures and policies to identify any areas of risk and concern. In the event that a real or potential risk is identified, we will seek to engage with any affected suppliers to address and eliminate any critical issues. Based upon the results of this review, where appropriate, any required risk-based monitoring or assurance programme will be developed and endorsed by the Group's Board. This may include the provision of training.

We are committed to improving our practices to combat slavery and human trafficking. Through continuous training, compliance with legislation, and vigilant monitoring, we aim to uphold the highest standards of ethical conduct in all our operations. We will keep under review how we communicate our ethical standards to our employees (and other individuals associated with Efficio) and third-party suppliers.



Jens Pedersen
CEO
Efficio

8th August 2024

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